November 2, 2026

Administrator Lee Zeldin
Environmental Protection Agency
1200 Pennsylvania Ave NW, Washington, DC 20004
Washington, DC

Submitted via: https://www.regulations.gov/document/EPA-HQ-OAR-2025-0124-2920

Dear Administrator Lee Zeldin,

Re: Comments on* Docket ID No. EPA-HQ-OAR-2025-0124: *"Rescission of the Greenhouse Gas Findings for Fossil Fuel-Fired Power Plants and Repeal of Regulations for Power Plant Greenhouse Gas Emissions Under Clean Air Act Section 111"

Thank you for the opportunity for Clean Air for the Long Haul, Platform for a Just Climate, and the undersigned organizations to submit the following comments in reference to the U.S. Environmental Protection Agency's ("EPA") proposed rule, "***Rescission of the Greenhouse Gas Findings for Fossil Fuel-Fired Power Plants and Repeal of Regulations for Power Plant Greenhouse Gas Emissions Under Clean Air Act Section 111.***"

The Clean Air for the Long Haul ("the Cohort") is a nationwide coalition of environmental justice groups working collectively to advance environmental justice by seeking emissions reductions in the power and transportation sectors in the United States.[1] The Cohort leads campaigns to amplify the voices and positions of pollution-burdened communities in federal rulemaking. The Cohort actively champions the adoption and enforcement of clean air and climate justice policies that prioritize emissions reductions of toxic air pollution and greenhouse gases and protect the health of Black, Brown, Tribal, Indigenous, and low-wealth communities across the United States. The Cohort is a subset of the national Environmental Justice Leadership Forum, comprising more than 40 organizations across 23 states. These groups are actively working together to ensure that diverse grassroots perspectives shape federal, state, and local programs and policy decisions, while advancing key climate justice and environmental policies that protect and strengthen communities of color and low-income communities nationwide.[2]

[1] Dare to Breathe, Campaign of the Clean Air for the Long Haul, 2025. https://daretobreathe.org/about/
[2] Environmental Justice Leadership Forum. (n.d.). *Environmental Justice Leadership Forum*. https://ejforum.org/about-us/

The Platform for a Just Climate ("the Platform"), a project of the Center for Earth, Energy & Democracy (CEED), is a national coalition working to build power for environmental justice with frontline communities and the organizations supporting them. The Platform for a Just Climate works to ensure those most harmed by climate change and the fossil fuel economy can actively participate in developing, winning, and implementing climate policies that address community needs.[3]

I. Introduction

The Cohort, the Platform, and the undersigned organizations strongly object to the agency's proposed rule on the grounds that it is based on an incorrect reading of Part 111 of the Clean Air Act. The 2007 ruling in *Massachusetts v. Environmental Protection Agency* [4] clearly confirmed that the Clean Air Act mandates that the EPA regulate pollutants that endanger public health and welfare. The EPA later confirmed this in the 2009 Endangerment Finding. In the subsequent 17 years, science has continued to confirm that greenhouse gas emissions not only pose a grave future threat to communities but are also actively increasing the danger of extreme weather due to human-caused climate change. The power sector accounts for approximately a quarter of all United States greenhouse gas emissions, the second largest sector behind vehicles,[5] and is a significant contributor to harms that affect public health, property, and the economic interests of communities.

In these comments, we will provide details on these harms and other contributing factors related to pollution from the power sector, especially with regard to communities of color and low-income communities. We will also provide a place for communities to directly voice the impacts they have experienced from extreme weather and disasters caused by climate change in the "Testimonials" section of these comments. The agency has a legal obligation to take action to protect these communities, but this proposed rule instead seeks to actively ignore that obligation and the public safety demands of our country's residents. We strongly oppose any attempt of the agency to ignore both the strong scientific consensus and the health and safety of frontline communities.

I.A. Fossil Fuel Racism: Disproportionate Impacts of Power Plants and Climate Change on Environmental Justice Communities

[3] Center for Earth, Energy & Democracy. (n.d.). *Platform for a Just Climate*. Retrieved October 15, 2026, from https://ceed.org/platform-for-a-just-climate/

[4] Massachusetts v. Environmental Protection Agency, 549 U.S. 497 (2007). https://supreme.justia.com/cases/federal/us/549/497/

[5] U.S. Environmental Protection Agency. (2015, December 29). Sources of Greenhouse Gas Emissions [Overviews and Factsheets]. https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions

Our communities disproportionately shoulder the health burdens caused by the siting and operation of industrial facilities in their neighborhoods. Decades of public health data have shown that throughout the country, living near fossil fuel operations, including power plants, greatly contributes to increased exposure to toxic air pollution and results in higher rates of respiratory, reproductive, and other health issues, cancer and even premature death.[6]

These fenceline communities are often Indigenous, low-income, and communities of color due to a legacy of discriminatory policies and practices. [7,8] This is well demonstrated in St. John Parish in Louisiana, referred to as "Cancer Alley", a predominantly Black community.[9] In this region, the risk of developing cancer from air pollution in the census tracts closest to fossil fuels and petrochemical facilities is nearly 50 times the national average.[10] Unfortunately, there are many communities of color across the country, including those represented by the Cohort and the Platform, with similar experiences of historic and current environmental injustice. Oil and gas infrastructure, in particular, has a disproportionate impact on Black people, resulting in elevated cancer risk, pregnancy complications, respiratory illness, and cardiovascular disease [11] as well as anemia, brain damage, eye, nose, and throat irritation, blood disorders, neurological disorders, and death.[12]

We also know that fenceline communities hosting fossil fuel infrastructure are at the greatest risk of climate change impacts. The most severe harms from climate change fall disproportionately upon the most vulnerable communities—those least able to prepare for, and

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[6] Jess Beagley. (2025). *Cradle to grave: The health harms of fossil fuel dependence and the case for a just phase-out*. Global Climate and Health Alliance. https://climateandhealthalliance.org/sdm_downloads/cradle-to-gravethe-health-harms-of-fossil-fuel-dependence-and-the-case-for-a-just-phase-out/

[7] Cushing, L. J., Li, S., Steiger, B. B., & Casey, J. A. (2023). Historical red-lining is associated with fossil fuel power plant siting and present-day inequalities in air pollutant emissions. *Nature Energy*, *8*(1), 52–61. https://doi.org/10.1038/s41560-022-01162-y

[8] Donaghy, T. Q., Healy, N., Jiang, C. Y., & Battle, C. P. (2023). Fossil fuel racism in the United States: How phasing out coal, oil, and gas can protect communities. *Energy Research & Social Science*, *100*, 103104. https://doi.org/10.1016/j.erss.2023.103104

[9] University Network for Human Rights. "Waiting to Die: Toxic Emissions and Disease Near the Louisiana Denka/DuPont Plant," (2019), https://www.epa.gov/sites/default/files/2019-12/documents/waiting_to,_die_final.pdf

[10] See footnote 8

[11] Tim Donaghy, Ph.D, and Charlie Jiang, Fossil Fuel Racism: How Phasing Out Oil, Gas, and Coal Can Protect Communities (April 13, 2021) https://www.greenpeace.org/usa/wp-content/uploads/2021/04/Fossil-Fuel-Racism.pdf at 4.

[12] Lesley Fleischman & Marcus Franklin. (2017). *Fumes Across the Fence-Line: The Health Impacts of Air Pollution from Oil & Gas Facilities on African American Communities*. Clean Air Task Force & National Association for the Advancement of Colored People. https://www.catf.us/resource/fumes-across-the-fence-line/

recover from, extreme weather events such as heat waves, poor air quality, flooding, and other climate-related impacts.

Our members live next to fossil fuel infrastructure and on the front lines of climate change, and that experience frames our review of this proposal. Alongside the broader environmental justice (EJ) movement, we assert our rightful place as essential stakeholders in all climate-related discourse, research, and policymaking. Our voices are not optional; they are indispensable to crafting equitable and effective solutions. Given the facts, we strongly endorse and advocate for transitioning our energy system away from fossil fuels that drive the climate crisis toward clean, renewable technologies. Anything short of this transition will result in further catastrophic harm to our communities.

EPA must:

- Incorporate a comprehensive environmental justice analysis that takes into account the cumulative impacts of emissions on environmental justice communities.
- Address both existing and new facilities. EPA must regulate all carbon emissions from power plants regardless of fuel type.
- Provide effective oversight of state compliance, with clear guidance and directives for the approval of state implementation plans (SIPs). In doing so, the EPA must not grant too much flexibility that allows states to compromise their duty to uphold environmental justice and safeguard air quality, public health, and the environment for frontline communities living near gas plants.
- Require that state plans demonstrate that the compliance approach adopted by each plant in an EJ community does not cause or contribute to adverse cumulative environmental or public health stressors in our communities.

Unfortunately, in this proposal, EPA disregards its duty to uphold public health and welfare in two main ways:

- The proposal denies public health impacts and costs associated with rescinding regulations for Power Plant Greenhouse Gas Emissions Under Clean Air Act Section 111.
- The proposal is unlawful and denies EPA's statutory authority to regulate Power Plant Greenhouse Gas Emissions.

II. The Proposal Denies Public Health and Climate Impacts of Power Plant Pollution on EJ communities

In this proposal, EPA claims that the Clean Air Act's Section 111 is best understood to cover pollution causing localized harm and that greenhouse gases (GHGs) "do not endanger public health or welfare through local or regional exposure." EPA further claims that regulating GHG emissions from fossil fuel-fired power plants would be "futile" and would not "materially address the health and welfare dangers attributed to global climate change concerns." Below, we illustrate the ways in which this proposal and failure to regulate GHG emissions from the power sector would:

A. Drive co-pollutant emissions from fossil fuel generation, which in turn are linked to several public health harms (respiratory illnesses, cardiovascular diseases) that endanger public health and welfare.
B. Worsen health impacts associated with GHG emissions (heat, ozone, wildfire smoke, extreme weather) and resulting climate change.
C. Drive public health harms disproportionately in EJ communities (siting of infrastructure in EJ communities, exposure, and vulnerability to pollution and climate change impacts)

II.A. Co-Pollutant Emissions & Public Health Impacts of Power Plant Pollution

The power sector remains a major contributor to GHG emissions and local air pollution. According to the EPA's own 2023 assessment, the electric power sector accounted for about 33% of total U.S. primary energy consumption and about 30% of total U.S. energy-related CO_2 emissions.[13] In 2024, the power sector also contributed to GHG emissions growth, with a 3% uptick in electricity generation relative to 2023.[14] Along with GHGs, fossil fuel-fired power plants also emit GHG co-pollutants such as nitrogen oxides, sulfur dioxide, fine particulate matter, and other toxics. These co-pollutants are linked to severe health impacts—including asthma, cardiovascular disease, cancer, and premature death. Vulnerable populations—such as children, the elderly, and those with existing respiratory conditions—are especially at risk. [15] From 1999 to 2020, 460,000 premature deaths in the U.S. were attributable to emissions from coal-fired power plants between 1999 and 2020.[16] Studies on plant closures show the strong public health gains achievable through regulating fossil fuel burning. In Louisville, retirements and scrubber installations were tied to about 400 prevented asthma-related hospitalizations and

[13] EPA (2023) Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021. U.S. Environmental Protection Agency, EPA 430-R-23-002. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-andsinks-1990-2021
[14] Gaffney, M., King, B., & Larsen, J. (2025, January 9). Preliminary US greenhouse gas estimates for 2024. https://rhg.com/research/preliminary-us-greenhouse-gas-estimaever-increasing.tes-for-2024/
[15] Cranmer, Z., Steinfield, L., Miranda, J., & Stohler, T. (2023). Energy distributive injustices: Assessing the demographics of communities surrounding renewable and fossil fuel power plants in the United States. *Energy Research & Social Science*, *100*, 103050. https://doi.org/10.1016/j.erss.2023.103050
[16] Henneman, L., Choirat, C., Dedoussi, I., Dominici, F., Roberts, J., & Zigler, C. (2023). Mortality risk from United States coal electricity generation. *Science*, *382*(6673), 941–946. https://doi.org/10.1126/science.adf4915

emergency room visits.[17] After Pittsburgh's Shenango Coke Works closed in 2016, pediatric asthma ER visits fell 41.2% three years on, compared with three years before.[18] In Chicago, asthma ER visits dropped 12% in areas near three closed coal plants compared with areas farther away.[19]

These harms associated with GHG co-pollutants are not inevitable. As cited above, where plants have closed, or controls were added, health outcomes improved.

II.B. Public Health Impacts of Climate Change

Local air pollution is only half of the story. The GHG emissions themselves worsen public health and welfare for environmental justice communities. Comprehensive reviews of scientific research by climate scientists, such as the Intergovernmental Panel on Climate Change (IPCC) assessment reports, the National Climate Assessments compiled by the US federal government, and countless other studies by scientific organizations, have characterized the catastrophic impacts of anthropogenic climate change. These impacts include but are not limited to: more frequent and severe natural disasters such as heat waves, hurricanes, and droughts; an overall decrease in global food security; and ever-increasing chances of triggering a tipping point resulting in sudden and devastating changes to our global systems.[20]

These impacts are not felt equally across the world, the U.S., or even regionally. Instead, they disproportionately burden communities of color and low-income populations. Our members and environmental justice communities at large are already living with the consequences. They know these damages not as distant projections, but as daily realities. To illustrate, a comprehensive global assessment of high-intensity weather events between 1975 and 2008 revealed that 23 of nearly 9,000 major events reported in this period were responsible for 1.8 million deaths, with an overwhelming toll of these deaths, 500,000, falling among impoverished

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[17] Bruggers, J. (2020, November 30). *Hospital visits declined after sulfur dioxide reductions from Louisville-area coal plants*. Inside Climate News. https://insideclimatenews.org/news/13042020/asthma-air-pollution-sulfur-dioxide-louisville-coal-power-plant/

[18] Yu W, Thurston GD. Reductions in Respiratory Hospital Visits after a Coal Coking Plant Closure: A Natural Experiment. Am J Respir Crit Care Med. 2025 Nov;211(11):2072-2085. doi: 10.1164/rccm.202410-2005OC. PMID: 40691837; PMCID: PMC12618997.

[19] Komisarow S, Pakhtigian EL. The Effect of Coal-Fired Power Plant Closures on Emergency Department Visits for Asthma-Related Conditions Among 0- to 4-Year-Old Children in Chicago, 2009-2017. Am J Public Health. 2021 May;111(5):881-889. doi: 10.2105/AJPH.2021.306155. Epub 2021 Mar 18. PMID: 33734848; PMCID: PMC8034013.

[20] Calvin, K., Dasgupta, D., Krinner, G., Mukherji, A., Thorne, P. W., Trisos, C., Romero, J., Aldunce, P., Barrett, K., Blanco, G., Cheung, W. W. L., Connors, S., Denton, F., Diongue-Niang, A., Dodman, D., Garschagen, M., Geden, O., Hayward, B., Jones, C., … Péan, C. (2023). *IPCC, 2023: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland.* (First). Intergovernmental Panel on Climate Change (IPCC). https://doi.org/10.59327/IPCC/AR6-9789291691647

communities.[21] Additionally, the U.S. Environmental Protection Agency's (EPA's) own climate vulnerability assessment found that: 1) amongst Hispanic and Latino individuals, 43% more likely to live in areas with the highest projected labor losses; 2) 48% of Native Americans are more likely to live in areas that will be inundated due to sea level rise, and 3) 40% of Black individuals are more likely to live in the areas with the highest projected increases in mortality rates.[22] These disparities can also be seen at the state level. In New York, where WE ACT is headquartered, the New York State Disadvantaged Communities Criteria reveal that the majority of residents in neighborhoods with the highest levels of heat vulnerability—classified as Heat Vulnerability Index 4 and 5—are concentrated in environmental justice areas. This underscores the intersection of climate risk and systemic inequity, where historically marginalized communities face the greatest exposure to extreme heat."[23] As certain as climate change will bring severe and far-reaching disruptions to our global systems, it is equally certain that its most severe impacts are falling on environmental justice communities.

II. C. Disproportionate Impact on EJ Communities

EPA had concluded in the repealed 2024 Carbon Pollution Standards that GHG emissions from the power sector have disproportionate and adverse effects on environmental justice communities.[24] This proposed rule does not include a comparable environmental justice analysis or identify which populations will bear the brunt of increased pollution exposure resulting from rescinding all GHG standards for the power sector.

Siting of Fossil Fuel Infrastructure in EJ Communities

Where plants are sited determines who bears their pollution. We know that disparities in power plant siting are linked to history of underinvestment and redlining in communities of color. Between 2000 and 2019, neighborhoods deemed "hazardous" were more likely to have a power plant sited. Studies have repeatedly found that communities with relatively high poverty levels are more likely to host coal-fired power plants for several reasons, including utility companies' pursuit of a path of least resistance. Communities hosting coal plants have the lowest incomes,

[21] Scovronick, N., Lloyd, S. J., & Kovats, R. S. (2015). Climate and health in informal urban settlements. Environment & Urbanization, 27(2), 657-678. https://doi.org/10.1177/0956short-sighted247815596502

[22] U.S. Environmental Protection Agency Headquarters. (2021, September). Climate Change and Social Vulnerability in The United States [Announcements and Schedules]. https://www.epa.gov/cira/social-vulnerability-report

[23] New York City Mayor's office of Sustainability. (2025). Environmental Justice in NYC: 2025 update. https://climate.cityofnewyork.us/wp-content/uploads/2025/04/EJNYC_Report.pdf

[24] U.S. Environmental Protection Agency. (2024, May 9). New Source Performance Standards for Greenhouse Gas Emissions From New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions From Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule. Federal Register. https://www.federalregister.gov/documents/2024/05/09/2024-09233/new-source-performance-standards-for-greenhouse-gas-emissions-from-new-modified-and-reconstructed

housing values, and college degree rates, and the highest poverty rates, of all power plant host communities.[25] In rural Monroe County in Georgia, the utility Georgia Power is keeping a giant coal plant alive. Generations of coal combustion have brought tens of millions of tons of coal ash to this community, a byproduct of burning coal packed with toxic pollutants such as arsenic, lead, and mercury. A lawsuit stated that from 2011 to 2015, the cancer rate in Monroe County "was more than double the state and national cancer rate."[26] Despite community outrage about coal ash contaminating local groundwater, this plant will continue to operate, and now with even less federal regulation, given the EPA's latest delay of the deadline for coal ash regulations. For decades, utilities dumped coal ash in unlined ponds, landfills, and mines where toxic pollution continues to leak into water and soil. There has been widespread reporting of violations of coal ash regulations by industry, with some utilities illegally closing coal ash ponds while toxic ash sits in groundwater. Communities like Waukegan, IL, a mostly Hispanic community, have been plagued with coal ash for years and have had to fight with the industry for the cleanup of the toxic coal ash dump. This EPA's refusal to regulate coal plants' carbon emissions will allow unchecked coal generation and introduce more public health risks associated with coal burning, such as coal ash in host communities.

The pattern is not limited to coal. As gas capacity expands, it is following the same map. Across the country, new natural gas plants are increasingly being built in densely populated areas with low-income communities and communities of color. [27] In northeastern states, the number of natural gas plants and the total net generation from natural gas in low-income communities and communities of color have increased over the years compared to other communities.[28] In California, almost half of the state's natural gas plants are in low-income communities, which are considered the most vulnerable due to exposure to multiple sources of pollution. Heard County, Georgia, hosts one of the nation's largest natural gas plants.[29] The county is home to communities experiencing high economic stress and multiple environmental risks, including increased exposure to air toxics and toxic water discharges. There are many communities across the country, such as the one in Heard County, Georgia, that experience a higher exposure to pollution from the power sector.

Higher Exposure and Higher Susceptibility to Pollution Impacts

[25] See Citation 22

[26] Cummings, C. (2026, October 8). *Western hemisphere's largest coal plant will keep running as Georgia's data center demand grows*. https://www.atlantanewsfirst.com. https://www.atlantanewsfirst.com/2026/10/08/coal-plant-that-was-set-close-now-powers-georgias-data-center-growth/

[27] See citation 22

[28] Declet-Barreto, J., & Rosenberg, A. A. (2022). Environmental justice and power plant emissions in the Regional Greenhouse Gas Initiative states. PLoS ONE, 17(7), e0271026. https://doi.org/10.1371/journal.pone.0271026

[29] Wansley combined cycle - heard, Georgia. Cleanview. (n.d.). https://cleanview.co/power-projects/operating/natural-gas-power-plants/georgia/55965/wansley-combined-cycle

Siting determines who is exposed, but not how severely exposure harms them. For environmental justice communities, health damages associated with exposure to pollution and climate change-related weather events are made worse by higher social vulnerabilities (such as lack of access to transportation, adequate housing, and healthcare).[30]

Low-income communities and communities of color carry a heavier burden of chronic illnesses, including asthma, diabetes, and cardiovascular disease, which heighten sensitivity to polluted air.[31] Lower-income households also have fewer financial options for moving away from pollution sources. Everyday neighborhood stressors, such as unsafe conditions, scarce green space, and limited access to healthy food, may be associated with chronic stress, which may further increase susceptibility to pollution-related illness. Low-income households are less likely to be insured and have limited health care coverage and so are less able to get affordable, quality care when they become ill.[32]

The same vulnerabilities that magnify the harm of local pollution can also magnify the harm of climate change driven by power plant emissions. As cited above, EPA's own 2021 study on Climate Change and Social Vulnerability in the United States found that communities with socioeconomic burden have a lower capacity to prepare for, cope with, and recover from extreme weather and climate-related events.[33] Communities of color experience higher average temperatures, more extreme heat days, and greater increases in overall heat exposure,[34] Due to a long legacy of racial segregation and redlining, Black communities are disproportionately located in areas that are more physically vulnerable to hurricanes and flooding.[35] During Hurricane Katrina, more than 80% of the homes lost belonged to Black residents, and Black people accounted for over half of the storm's fatalities.[36] The same inequities show up in wildfire risk. One national study found that wildfire vulnerability is not shared equally:

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[30] Tee Lewis, P. G., Chiu, W. A., Nasser, E., Proville, J., Barone, A., Danforth, C., Kim, B., Prozzi, J., & Craft, E. (2023). Characterizing vulnerabilities to climate change across the United States. *Environment International*, *172*, 107772. https://doi.org/10.1016/j.envint.2023.107772

[31] Kerr, G. H., Van Donkelaar, A., Martin, R. V., Brauer, M., Bukart, K., Wozniak, S., Goldberg, D. L., & Anenberg, S. C. (2024). Increasing Racial and Ethnic Disparities in Ambient Air Pollution-Attributable Morbidity and Mortality in the United States. Environmental Health Perspectives, 132(3), 037002. https://doi.org/10.1289/EHP11900

[32] American Lung Association. (2026, January 15). *Who is Most Affected by Outdoor Air Pollution?* https://www.lung.org/clean-air/outdoors/who-is-at-risk

[33] See citation 25

[34] Chen, S., Lund, K., Murphy-Dunning, C., & Seto, K. C. (2024). More extremely hot days, more heat exposure and fewer cooling options for people of color in Connecticut, U.S. *Npj Urban Sustainability*, *4*(1), 47. https://doi.org/10.1038/s42949-024-00186-5

[35] Zach Bruick, Munya Muvezwa, Kirtiman Pathak, Daniel Stephens, Shelley Stewart, & Alexis Trittipo. (2023, November 30). Climate change and race: The impact on Black lives. https://www.mckinsey.com/institute-for-economic-mobility/our-insights/impacts-of-climate-change-on-black-populations-in-the-united-states#skipToMain

[36] Kirsten Anderson. (2025, August 29). Can Hurricanes Discriminate? Economic Justice After Katrina. Southern Poverty Law Center. https://www.splcenter.org/resources/reports/hurricanes-katrina-disaster-response/

communities that are majority Black, Hispanic, or Native American face roughly 50% greater vulnerability than other communities.[37]

The Omission of Costs to Public Health in EPA Rulemakings

A comprehensive accounting that fully measures the full scope of impacts from potential rulemakings is essential in crafting sound and robust policies that protect the environment and public health. Earlier this year, the agency made an indefensible decision to discontinue including public health impacts from its policy decisions and solely focus on the monetary costs to industry.[38] The agency's mission statement is incredibly clear: "to protect human health and the environment". By ignoring the monumental costs of pollution to human health, the agency is prioritizing industry interests over people's health and safety.

These actions clearly run afoul of both the stated mission of the Agency and laws, such as the Clean Air Act, which the Agency states mandate it to "promote the public health and public welfare".[39] There is a well-established volume of scientific knowledge, much of it cited in these comments, that clearly documents the negative impacts pollution has on human health. The Agency's refusal to acknowledge and report on these impacts in the context of its rulemakings, because they are inconvenient to industrial interests, does not make them simply disappear. Communities continue to deal with the adverse health consequences of pollution on their lives and health, and it remains the Agency's legal obligation to account for and address these issues. The Cohort, Platform, and undersigned parties call on the Agency to immediately resume publishing comprehensive analyses of the public health impacts of rulemakings so that policymakers, elected leaders, and the public can understand the consequences of any potential rule.

The Compounding Impacts of the EPA's Rollbacks are Detrimental to EJ Communities

This proposal does not stand alone. It is one of a series of rollbacks whose combined effect falls hardest on communities already overburdened. The Cohort and the Platform have long advocated for the most protective environmental and public health standards to mitigate and ultimately reverse the impacts that environmental racism and climate change inflict on our communities. Unfortunately, the administration has repeatedly chosen to ignore our concerns

[37] Ma, M. (2018, November 2). Racial, ethnic minorities face greater vulnerability to wildfires. UW News. https://www.washington.edu/news/2018/11/02/racial-ethnic-minorities-face-greater-vulnerability-to-wildfires/
[38] Joselow, Maxine. "E.P.A. to Stop Considering Lives Saved When Setting Rules on Air Pollution." Climate. *The New York Times*, January 12, 2026. https://www.nytimes.com/2026/01/12/climate/trump-epa-air-pollution.html.
[39] US EPA, OA. "Summary of the Clean Air Act." Overviews and Factsheets. February 22, 2013. https://www.epa.gov/laws-regulations/summary-clean-air-act.

and instead deregulate to promote industry, as initiated by Executive Order 14192, "Unleashing Prosperity Through Deregulation."[40] This Executive Order and the rules that have stemmed from it follow in the tradition of scapegoating regulations as an economic burden despite evidence to the contrary. For just one example of this, the EPA has estimated the economic benefits of the Clean Air Act (which the proposed rule weakens) from 1990 to 2020 exceeded costs by a factor of over 30:1.[41] Another example shows that the deregulatory policies of this administration will cause household electricity prices to rise 25% and cost U.S. consumers another $30 billion in electricity costs.[42] This short-sighted approach to undoing the progress the environmental justice movement has made only serves the fossil fuel industry.

The rollbacks and weakening of critical environmental laws represent a significant threat to environmental justice communities. The EPA, in its pursuit of the "greatest deregulatory action in history,"[43] has moved to weaken, delay, and roll back several standards that are projected to benefit the health and quality of life not just for environmental justice communities but for all people who live in this country. NYU estimates that cumulatively these rollbacks will forfeit over $150 billion per year in net health benefits and result in 3300 more premature mortalities per year than had these standards been implemented.[44] Furthermore, estimates of the cost of net greenhouse gas damages from the repeal of the 2024 carbon power plant rule are estimated to be $1.5 trillion without even accounting for local air pollution impacts.[45] Undoubtedly, these costs will fall most heavily on communities already overburdened by pollution from industry and transportation. At every deregulatory effort, the Cohort and the Platform have voiced

[40] The White House. (2025, January 31). *Unleashing Prosperity Through Deregulation*. https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-prosperity-through-deregulation/
[41] U.S. Environmental Protection Agency. (2026, March 30). Benefits and Costs of the Clean Air Act 1990-2020, the Second Prospective Study [Overviews and Factsheets]. https://www.epa.gov/clean-air-act-overview/benefits-and-costs-clean-air-act-1990-2020-second-prospective-study
[42] Levin, A., & Zhu, Y. (2026). *An affordability crisis of Trump's making*. Natural Resources Defense Council. https://www.nrdc.org/press-releases/nrdc-report-how-trumps-actions-are-hiking-utility-bills-and-destroying-investments
[43] U.S. Environmental Protection Agency. (2025, March 12). EPA Launches Biggest Deregulatory Action in U.S. History [News Release]. https://www.epa.gov/newsreleases/epa-launches-biggest-deregulatory-action-us-history
[44] Institute for Policy Integrity. (n.d.). Tracking the Damages of Regulatory Rollbacks. Retrieved October 15, 2026, from https://policyintegrity.org/tracking-regulatory-rollbacks
[45] Peplinski, M., Hubbell, B., & Mccormack, K. (2026, October 13). *Losing the Endangerment Finding: The Costs and Benefits of Repealing Greenhouse Gas Emissions Standards for Power Plants*. Resources for the Future. https://www.resources.org/common-resources/losing-the-endangerment-finding-the-costs-and-benefits-of-repealing-greenhouse-gas-emissions-standards-for-power-plants/

opposition to rollbacks, including the endangerment finding,[46] the GHG accounting program [47] and the methane standards.[48]

III. The Proposal is Unlawful and Denies EPA's Duty

The EPA's proposal is legally unjustifiable and conflicts with the Agency's obligations under the Clean Air Act, well-established Supreme Court precedent, and the Administrative Procedure Act.

Section 111 of the Clean Air Act requires that EPA must regulate stationary sources that "cause or contribute significantly" to air pollution that may reasonably be anticipated to endanger public health and welfare. Several Supreme Court decisions, including *Massachusetts v. EPA and American Electric Power v. Connecticut,* and other courts have consistently recognized EPA's authority over power plant climate emissions. Thus, EPA's reliance on the major questions doctrine for rescinding the EPA's 2015 greenhouse gas findings and eliminating all remaining carbon dioxide standards for fossil fuel-fired electric generating units holds little water. W*est Virginia vs EPA* addressed a method by rejecting "generation shifting," but it did not question the Agency's authority to limit power plant greenhouse gas emissions. EPA's legal obligation under the Clean Air Act is clear and long-standing. Furthermore, EPA's denial of its authority in this proposal contradicts the Agency's claims in a recent amicus brief to the Supreme Court in the *Suncor Energy v. Boulder County* case,[49] where the Department of Justice argues that the Clean Air Act gives the EPA authority to regulate greenhouse gas emissions.

As mentioned previously, power plants are the second largest contributor to the nation's climate pollution, accounting for a quarter of total U.S. greenhouse gas emissions. If the U.S. power sector were its own country, it would be ranked among the world's top sources of greenhouse gases.[50] Moreover, EPA's own analyses have shown that communities living near

[46] Moving Forward Network, Climate Justice Alliance, The Equitable & Just National Climate Platform, Environmental Justice Health Alliance for Chemical Policy Reform, & Environmental Justice Leadership Forum. (2025, September 30). *Comments on "Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards."* https://www.regulations.gov/comment/EPA-HQ-OAR-2025-0194-1480

[47] GreenLatinos, WE ACT for Environmental Justice, & Climate Justice Alliance. (2025, November 3). *Comment on "Proposed Repeal and Suspension of the Greenhouse Gas Reporting Program and Subpart W Requirements for the Oil and Natural Gas Sector."* https://www.regulations.gov/comment/EPA-HQ-OAR-2025-0186-0835

[48] GreenLatinos, WE ACT for Environmental Justice, & Climate Justice Alliance. (2025, October 1). Comment on "Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review Final Rule." https://www.regulations.gov/comment/EPA-HQ-OAR-2025-0162-0159

[49] U.S Department of Justice. (2026, May 21). Suncor Energy (U.S.A.) Inc. V. County Commissioners of Boulder County Brief. https://www.justice.gov/osg/brief/suncor-energy-usa-inc-v-county-commissioners-boulder-county

[50] Howard, P. H., & Schwartz, J. A. (2025, May 30). The Scale of Significance: Power Plants. Institute for Policy Integrity. https://policyintegrity.org/publications/detail/the-scale-of-significance-power-plants

fossil fuel- fired power plants, which are most often Indigenous, low-wealth, and people of color, are exposed to toxic co-pollutants like nitrogen oxides (NOx), sulfur dioxide (SOx), particulate matter, mercury, and other hazardous air pollutants.[51] These emissions lead to higher rates of respiratory, reproductive, and other health issues, which in turn ultimately result in devastating outcomes such as cancer and premature death. The Agency's studies have also demonstrated that these same communities are most vulnerable to climate impacts and risks, such as premature deaths from extreme temperatures, increased childhood asthma rates, loss of property from sea level rise and flooding.[52]

Given the United States' outsized contribution to domestic and global greenhouse gas emissions and the disproportionate climate and health burdens borne by environmental justice communities, it is evident that EPA's supplemental proposal rests on the flawed premise that regulating climate emissions is futile and would have no meaningful impact on public health and welfare. This position is again contrary to *Massachusetts v. EPA* – and though it focused on motor vehicles and engines (CAA Section 202) – the decision recognizes that a sector's emissions can be "meaningful" and require regulatory action to drive down emissions, even if they are just a proportion of global emissions.[53]

Moreover, EPA proposes to rescind its 2015 and 2024 greenhouse gas findings for fossil fuel-fired power plants based primarily on a revised interpretation of its authority under Clean Air Act section 111 and on the basis that those findings should be withdrawn following EPA's repeal of the 2009 greenhouse gas endangerment finding earlier this year. The scientific evidence and extensive public comments in the record continue to demonstrate that power plant greenhouse gas emissions contribute significantly to air pollution that endangers public health and welfare, supporting continued regulation under CAA section 111. EPA's new interpretation finds no support in the statutory text, and the Agency cannot disregard record evidence in favor of a changed policy preference without providing a well-reasoned explanation. Accordingly, EPA must explain its departure from its prior findings and longstanding interpretation of its authority, meaningfully address the evidence concerning the contribution of power-sector emissions to climate change, and evaluate the foreseeable public health, environmental, economic, and environmental justice consequences of rescinding these findings, particularly for overburdened and socially vulnerable communities. If EPA finalizes the proposal

[51] U.S. Environmental Protection Agency. (2021, January 24). Power Plants and Neighboring Communities [Data and Tools]. https://www.epa.gov/power-sector/power-plants-and-neighboring-communities

[52] See citation 25

[53] Jenks, C., & Kranz, E. (2026, October 8). EPA Repeals Power Plant Carbon Standards. Harvard Law School Environmental and Ene,gy Law Program. https://eelp.law.harvard.edu/epa-repeals-power-plant-carbon-standards/

without adequately addressing these issues and responding to significant comments, it would be inconsistent with the standards of the Clean Air Act and the Administrative Procedure Act.

The EPA's proposal to disclaim its responsibility to regulate climate pollution is contrary to the Agency's mission to protect human health and the environment and the mandate given by Congress in the Clean Air Act. Eliminating greenhouse gas standards for power plants would reinforce entrenched environmental burdens and health disparities, especially for Indigenous, low-income, and communities of color already overburdened by fossil fuel power plant pollution and among the most vulnerable to climate-related harms. The supplemental proposal could also remove the regulatory pressure that significantly drives down climate emissions and harmful air pollution from the power sector. This undermines progress towards clean air, better health outcomes, and lower energy bills that these communities on the frontlines of power plant pollution and the climate and affordability crisis need and deserve. Rather than fulfilling its mission and acting in the public interest, this proposal fails to adequately account for significant health, environmental, and economic harms associated with increased climate emissions and leaves communities facing the greatest cumulative environmental burdens with fewer protections and greater risk.

IV. Conclusion

For the reasons stated above, the Cohort and the Platform, and supporting organizations object to the EPA's supplemental proposed rule. The EPA has a continued obligation to regulate greenhouse gas emissions not just in the power sector but in all other polluting sectors as well. The EPA's attempt to abdicate its authority displays a disregard for the needs of environmental justice communities who are most vulnerable to the realities of climate change and fossil pollution. This attempt also relies on a gross misinterpretation of the Clean Air Act, ignores decades of precedent from court decisions, and disregards the Agency's obligations under both the Administrative Procedure Act and the Clean Air Act.

To close, we note that this proposal's harm does not occur in isolation but is another iteration of the EPA's move to service polluters at the cost of its mission to protect human health and the environment. The communities represented by this letter are being further burdened by the costs of repeated delays, weakenings, and rollbacks to bedrock environmental laws. If this rule is to take effect, then it will result in the complete abandonment of the EPA taking climate action. In addition to the pollution and public health burden, the administrative burden is also notable in the inadequate time given by the EPA to respond to the proposed rule, with a condensed 45-day comment period and a paltry offering of hearing dates and times (the EPA gave three days, two hours each, totaling 6 hours) to offer testimony. This is especially egregious

in the aftermath of the proposed repeal of the endangerment finding, where over 500,000 comments [54] were submitted indicating a large public interest in GHG regulations. In this context, it is wholly inappropriate, negligent, and irresponsible to arbitrarily limit opportunities for public comment. The burdens placed upon our communities must be at the forefront of any discussions regarding regulation of greenhouse gases; anything short of that is a failure on behalf of the EPA to fulfill its mission.

The Cohort, the Platform, and the undersigned organizations urge the EPA to abandon this proposal and maintain its authority to carry out its mission.

Sincerely,

Clean Air for the Long Haul and Platform for a Just Climate organizations:

Center for Earth, Energy and Democracy
Duwamish River Community Coalition
Earthjustice
Environmental Justice Health Alliance for Chemical Policy Reform
Green Door Initiative
GreenLatinos
Harambee House / Citizens for Environmental Justice
Los Jardines Institute
Michigan Green Muslims
New Jersey Environmental Justice Alliance
PODER Austin
RISE4EJ
Sierra Club
Tishman Environment and Design Center at The New School
Union of Concerned Scientists
WE ACT for Environmental Justice
West End Revitalization Association

Supporting Organizations:

Anthropocene Alliance
Alaska Community Action on Toxics
Alternatives for Community & Environment
Atchafalaya Basinkeeper
Bayou City Waterkeeper
California Communities Against Toxics
Center for Engagement, Environmental Justice and Health INpowering Communities
Center for Progressive Reform
Choctawhatchee Riverkeeper, Inc.
Clean Power Lake County
Clean Water Action
Climate Justice Alliance
Climate Reality Project - New Jersey
Collectrify
Coming Clean Network
Cooperative Energy Futures
Environmental Data and Governance Initiative

[54] U.S. Environmental Protection Agency. (2025, August 1). Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards. Federal Register. https://www.federalregister.gov/documents/2025/08/01/2025-14572/reconsideration-of-2009-endangerment-finding-and-greenhouse-gas-vehicle-standards

Flint Rising
Food & Water Watch
Friends of the Earth US
Just Solutions
Kentucky Conservation Committee
Memphis APRI
Micah Six Eight Mission
Milwaukee Riverkeeper
Mothers & Others for Clean Air
Moving Forward Network
NC Climate Justice Collective
North American Climate, Conservation and Environment
Occupy Bergen County
Passionist Solidarity Network
Plaine Products
Resource Renewal Institute
Respiratory Health Association
Seneca Lake Guardian
South Bronx Unite
Sowing Justice
Texas Environmental Justice Advocacy Services
Water You Fighting For
West Berkeley Alliance for Clean Air and Safe Jobs
WildEarth Guardians

V. Testimonials

V.A. Irene Burga, Green Latinos

"Hello. My name is Irene Burga and I'm the Climate Justice and Clean Air Program Director at GreenLatinos. GreenLatinos is an active comunidad of Latino leaders, emboldened by the power and wisdom of our culture and driven to secure our environmental liberation. I'm here today representing thousands of Latinos across the country that believe that if these EPA rules to limit the devastating impact of power plant pollution should be maintained and strengthened.

Power plants are the second largest source of greenhouse gas emissions in the U.S. and put millions of Latines in harm's way. 15% of all Latines in the United States live within 10 miles of a coal-fired power plant. Latine communities living near power plants bear an increased exposure to harmful pollutants including particulate matter, sulfur dioxide, and nitrogen oxide. These pollutants put us at higher risk for cardiovascular diseases, respiratory illnesses, premature death, and more. Latinos are twice as likely to go to the emergency room for asthma than white U.S. residents. Latines are disproportionately exposed to about 63% more particulate matter pollution than is caused partly by power plant pollution. Latine communities are 43% more likely to live in places that will see more loss of life, health, and employment from the effects of climate change than the U.S. population at large. That's why rules that protect the health and safety of our communities are critical.

This issue is personal to me. I grew up in Whittier, California, surrounded by oil drilling. Near my community was the Santa Fe Springs Oil Field, where seeing active oil rigs was and still is normalized. So was asthma. So were respiratory illnesses among neighbors and family members. I saw firsthand how pollution shapes the health and quality of life of communities like mine. Los Angeles County was once again ranked number 1 for having the worst ozone pollution in the country according to the American Lung Association, State of the Air report.

That is why these rollbacks are so dangerous.

These protections were the bare minimum. They save lives. Weakening them means more asthma attacks, more hospitalizations, more dangerous working conditions, and more preventable deaths in communities that are already disproportionately impacted.

Clean air should not depend on your ZIP code, your income, or the color of your skin. Protecting public health should not be partisan.

I urge you to do everything in your power to defend these protections and ensure that frontline communities are not sacrificed for the benefit of polluting industries."

V.B. Miya Ayala-Marshall, Duwamish River Community Coalition

"*In South Seattle's Duwamish Valley, community members are forced to disproportionately shoulder the burdens associated with the presence of multiple industrial and polluting facilities in our community. Our neighborhoods have been exposed to decades of air, water, and land pollution. The cumulative disparities are seen through our health burdens. When compared to wealthier areas of Seattle our life expectancy is 13 years lower. The Valley also faces the highest rates of childhood asthma hospitalization in all of King County, and elevated rates of cancer and respiratory and cardiovascular disease. However, the impact of this pollution is not only felt in our community via our health; greenhouse gas emissions from industries have continued to accelerate climate change and the associated environmental hazards and freak weather events. Pollution-burdened communities have already been - and will continue to be - impacted by climate change first and worst. In the Duwamish Valley, community members are situated directly next to the Duwamish River. Unfortunately, 50 years ahead of Seattle's climate change predictions, the Duwamish River overtopped. As a direct result of rising sea levels and more severe King Tides, the River flooded homes and businesses. Over 200 people were impacted, and 50 community members were permanently displaced.*

Policies that acknowledge the impact of and regulate greenhouse gas emissions are not only critical to reducing the severity of impacts associated with climate change, but also promoting health equity by reducing pollution."

V.C. Dr. Beverley Wright, Deep South Center for Environmental Justice

"In Louisiana and across the Gulf Coast, the impacts of climate change are not distant or abstract. In 2021 following Hurricane Ida, DSCEJ staff were displaced from their homes and communities for up to two weeks, exposing them to prolonged stress, uncertainty, and disruptions to their daily lives. This experience demonstrates how extreme weather can upend daily life, create financial hardship, displace families, disrupt communities, and threaten our health, safety, and well-being.

Climate change is increasing the risks associated with extreme heat, heavy rainfall, and coastal flooding, while warmer ocean waters and rising sea levels can intensify the impacts of hurricanes. In South Louisiana, we experience these risks firsthand year after year. Climate change is not simply a global, national, or regional concern; it has direct and tangible consequences for our local communities, affecting our health, safety, homes, and livelihoods. The EPA has both the authority and the responsibility, under applicable federal law, to address greenhouse gas emissions from power plants and protect public health and welfare. Greenhouse gas emissions from fossil-fuel-fired power plants contribute to climate change, while other pollution from burning fossil fuels harms air quality and public health. These burdens fall particularly heavily on communities already overburdened by industrial pollution and environmental hazards.

At a time when electricity demand is growing to support data centers and other energy-intensive operations, including space-related activities, EPA is proposing to eliminate critical greenhouse gas standards for power plants. Weakening these protections while expanding reliance on fossil fuels places additional burdens on communities already facing the consequences of pollution and increasingly severe weather risks.

For Louisiana and Gulf Coast communities, this is about more than energy policy. It is about protecting our health, keeping families safe, reducing the risks that threaten our homes and livelihoods, and ensuring that communities can recover from disasters without facing additional environmental burdens.

We urge EPA to withdraw its proposal and maintain strong greenhouse gas protections for fossil-fuel-fired power plants. Our communities deserve clean air, meaningful safeguards against climate pollution, and an energy future that prioritizes public health, environmental justice, and community resilience."

V.C. Brian Russo, Climate Ready - NJ

“Working for a large insurance company as an auto damage adjuster, I saw firsthand the amount of waste generated from auto repairs and learned about emissions. EV's existed in the early 1900's and Ford made a vehicle that ran on carbon neutral biofuel made with hemp. There are alternatives to fossil fuels. Internal documents show that Exxon, Shell, Chevron and more knew the impact of burning oil and gas since the 50's but invested in spreading misinformation and lobbying to prevent transitioning to renewable energy. Big oil spent 445 billion to elect the current administration and in return, more than 40 members with direct ties to oil and gas were appointed to his administration. It is clear that this is a direct attack on our clean air and water. Big oil is making record profits. We are fighting wars for resources by design. The cost of damages to our infrastructure and property is driving up the cost of everything. A study done by Harvard concluded that 1 in 5 deaths are related to climate change. We are paying the costs associated from air pollution or emissions with our health and the rising cost of living. There is no justification to allow energy providers the ability to poison us without consequence. Renewable energy is the cheapest form of energy and also the quickest to develop. There is no justification to continue to expand infrastructure or our dependence on outdated, dirty forms of energy. Allowing businesses to poison your constituents is not governing for the public wellbeing. We need to rapidly invest in decarbonization to reduce emissions and protect what we can. If emissions continue to rise, we face worldwide droughts and food shortages.”

V.D. Yvonee Taylor, Seneca Lake Guardian

“For years, communities across this country have fought tirelessly for clean air, clean water, and a livable climate. These protections were hard won, and now the Trump Administration's EPA is threatening to unravel that progress by eliminating greenhouse gas pollution standards for coal and gas power plants and stripping away its own authority to regulate these emissions in the future.

We've already seen what happens when polluting corporations are allowed to put private profits over public health. In New York's Finger Lakes, our community has spent years fighting Greenidge Generation, a previously shuttered power plant resurrected to burn fracked gas for energy-intensive Bitcoin mining. The facility has emitted hundreds of thousands of tons of carbon pollution annually, despite New York's Department of Environmental Conservation denying its air permit for violating the state's landmark climate law. Still, Greenidge has continued operating, threatening the clean air, water, and agricultural economy that our region depends on.

Now, as cryptomining companies jump ship to the next lucrative industry of AI data centers, we're seeing a renewed push to keep aging fossil fuel plants operating and build new gas infrastructure to meet their enormous electricity demands.

Just as 'Big Tech' needs 'Big Oil' to power this expansion, the oil industry is relying on tech giants to justify further investment in fossil fuels. At a time when we should be accelerating our transition away from dirty energy, the EPA is proposing to remove the very safeguards intended to limit climate pollution from these facilities.

Enough is enough. Communities like ours should not have to sacrifice their health, their environment, and their future so a handful of corporations can continue profiting from pollution.

If the EPA abandons its responsibility to regulate greenhouse gas emissions from power plants, it will send a dangerous message to polluters everywhere that climate protections are negotiable. We strongly oppose this proposed rollback and urge the EPA to maintain enforceable greenhouse gas standards for fossil fuel power plants, rather than leaving communities to shoulder the consequences for generations to come."

V.E. Rebecca Sobel, WildEarth Guardians

"WildEarth Guardians has spent decades fighting pollution from coal-fired power plants across the Southwest, including the Four Corners Power Plant in New Mexico and the Comanche plant in Colorado. We know firsthand what's at stake when EPA abandons its responsibility to regulate climate pollution.

Across the West, rising temperatures, worsening drought, declining river flows, and increasingly severe wildfires threaten the public lands, watersheds, wildlife, and communities we work to protect. From the Rio Grande and its endangered silvery minnow to the Colorado River Basin, climate change is already undermining decades of conservation work.

EPA's attempt to eliminate greenhouse gas safeguards for power plants would allow fossil fuel polluters to continue contributing to these harms while communities and ecosystems bear the costs. Guardians strongly opposes this rollback and supports holding EPA accountable for its obligations under the Clean Air Act."

V.F. Dr Charlotte L Keys, JPAP

"We need the EPA to uphold every LAW for all of our communities, not DeRegulate the LAWS that make Polluters PAY for TOXIC POISONING of our LAND, AIR, WATER, HEALTH and FOODS. EPA was set forth to protect our ENVIRONMENT FOR ALL COMMUNITIES. EPA Needs to STOP GUTTING THE LAWS THAT PROTECT OUR ENVIRONMENT AND ENFORCE THE LAWS."

V.G Beto Lugo Martinez, RiSE4EJ

"For decades, grassroots organizations and members of Clean Air for the Long Haul have fought hard to ensure health-protective carbon standards for frontline communities which bear the brunt of fossil fuel pollution and the catastrophic damage of the climate crisis."

V.H Anastasia Gordon, WE ACT for Environmental Justice

"EPA's repeal of the 2024 standards and attempts to deny its authority to regulate carbon emissions from power plants is unjustifiable – both under the law and morally. It is a failure that falls hardest on environmental justice communities living on the frontlines of pollution and the climate crisis. Every rollback by the Trump EPA is a deliberate choice that perpetuates the cycle of communities of color and low-income neighborhoods across the country being treated as sacrifice zones by the fossil fuel industry. It means more of our children with asthma, more parents lost too soon, higher energy costs, and more of our homes and cities devastated by preventable disasters."

" We need strong protections, not policies that recklessly upend climate action and put polluter profits over our lives. WE ACT for Environmental Justice and the Clean Air for the Long Haul cohort will not stop fighting to hold EPA accountable to its mission of protecting human health and the environment."

V.I Ayo Wilson, West End Revitalization Association

"The EPA rolling back carbon standards and weakening the Endangerment Finding [for power plants] *is an abandonment of duty to communities across the country and a direct assault on the health and lives of communities of color and low-income communities, folks that work hard every day to provide for their families. That's compounded here in North Carolina with grants to Duke Energy for coal plants from the Trump administration of $28.4 million and $34 million to upgrade the Roxboro plant (Person County) and the Belews Creek plant (Stokes County), respectively, as Duke Energy seeks to raise rates on customers across the state. The federal government also invested $129 million in Duke Energy in June to scrap offshore wind production on North Carolina's coast. The folks of North Carolina and across the country don't deserve to pay for bad decisions and investments with their health and lives. We urge the EPA to reverse course and stand with communities."*