

The Honorable Lee M. Zeldin U.S. Environmental Protection Agency 1200 Pennsylvania Avenue NW Washington, DC 20004

August 6, 2025

Docket ID No. EPA-HQ-OAR-2025-0124

Dear Administrator Zeldin,

I write on behalf of the U.S. Climate Alliance, a bipartisan coalition of 24 governors who together represent approximately 60 percent of the U.S. economy and 55 percent of the U.S. population. We are gravely concerned by the U.S. Environmental Protection Agency's (EPA) recent proposal to repeal carbon pollution standards and leave hundreds of millions of Americans unprotected against greenhouse gas pollution from fossil fuel-fired power plants.¹ This proposed repeal ignores the science, flouts the federal government's legal obligation under the Clean Air Act, and disregards the will of the American people. We urge EPA to withdraw this proposal and reconsider its approach.

As part of EPA's longstanding mission to protect human health and the environment, the agency has been obligated to regulate carbon dioxide from power plants for more than 15 years. This duty to control dangerous carbon pollution from the power sector is consistent with widely agreed upon science² and with EPA's own science-based determination in 2009 that six greenhouse gases, including carbon dioxide, endanger the public health and welfare of current and future generations.³ That determination relied upon an extensive record of peer-reviewed research on climate change and its undeniable harms to our nation's air quality, public safety, infrastructure, energy production, agriculture, water resources, and more. The science — including the federal government's own research⁴ — is unequivocal that anthropogenic greenhouse gas emissions are significant contributors to climate change, which has catastrophic impacts on Americans. Federal administrations of both parties have upheld this fundamental principle, including under President Trump's first administration. We strongly oppose this proposal's departure from past precedent and abandonment of EPA's legal obligation to safeguard public health and welfare from air pollutants.

The Alliance's members are demonstrating through a suite of state-level policies and actions that we can successfully protect Americans from carbon pollution and deliver cleaner electricity at the same time we meet growing energy demand, create good-paying jobs, and lower energy costs. It is a false choice to suggest the United States must choose between safeguarding clean air and meeting the country's need for affordable, reliable, and resilient power. Our states and territories are making clear that we can do both. Between 2005 and 2022, Alliance members collectively added nearly 200 GW of new generation capacity to meet energy demand⁵ — while at the same time reducing carbon pollution in the electricity sector by 40 percent,⁶

¹ U.S. EPA. "Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units." June 17, 2025.

² Intergovernmental Panel on Climate Change. "<u>Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change.</u>" Sixth Assessment Report (AR6), August 9, 2021.

³ U.S. EPA. "Endangerment and Cause of Contribute Findings of Greenhouse Gases Under Section 202(a) of the Clean Air Act." December 15, 2009.

⁴ U.S. Global Change Research Program. "<u>Impacts, Risks, and Adaptation in the United States</u>." Fourth National Climate Assessment. November 23, 2018.

⁵ U.S. Energy Information Administration. "Form EIA-860." Early release 2024 data. June 11, 2025.

⁶ U.S. Energy Information Administration. "<u>Table CO2.1. Total CO2 emissions estimates from energy consumption by source</u>" (SEDS). June 27, 2025.

lowering economy-wide greenhouse gas emissions by 19 percent, growing their economies by 30 percent, and delivering lower levels of harmful air pollutants than the rest of the country.⁷

In contrast, EPA's proposal to eliminate all carbon pollution limits on power plants would prolong Americans' reliance on dirtier, more expensive forms of energy⁸ — raising electricity prices for households across the country — while causing unmitigated environmental and public health harms to families and communities. The carbon pollution standards finalized in April 2024 that EPA now proposes to repeal were projected to deliver \$370 billion in net benefits and improve health outcomes, including preventing 1,200 premature deaths, 1,900 cases of asthma, 48,000 avoided school absence days, and 57,000 lost workdays through 2035.⁹ Repealing these standards would abandon all of these economic and public health benefits. EPA's own modeling finds its proposed repeal will cost Americans \$110 billion in net lost benefits, largely due to negative health impacts.¹⁰ The cost to Americans is even higher, by hundreds of billions of dollars, when accounting for the social cost of greenhouse gases.¹¹

The overwhelming majority of Americans support the federal government's current limits on power plant pollution and oppose the repeal of such limits. ¹² A study conducted earlier this summer found broad public support across the United States for keeping the carbon pollution standards in place and wide-ranging concern among both Democrats and Republicans about EPA's plan to eliminate limits on how much carbon dioxide power plants can emit. ¹³ The public understands — just as we do — that unfettered power plant pollution adversely impacts our public health and is a major contributor to global carbon emissions. In fact, the United States' electricity sector emitted more than 1,500 million metric tons of carbon dioxide in 2022, including more than 850 million metric tons from coal-fired power plants and nearly 660 million metric tons from gas-fired plants. ¹⁴ If our nation's electricity sector were a country, that level of pollution would rank it as the sixth biggest emitter in the world. ¹⁵

Our nation needs holistic solutions to the electricity sector that meet growing energy demand, uphold the federal government's obligations under the Clean Air Act, safeguard Americans' fundamental right to clean air, reflect the indisputable science on climate change, and prioritize the protection of public health. As noted, the Alliance's members have demonstrated this is possible. Yet this proposal fails to meet these goals and threatens unacceptable harms to our communities. We urge that it be withdrawn.

Thank you for the opportunity to comment and for your consideration of our concerns.

Sincerely,

Casey Katims
Executive Director

U.S. Climate Alliance

⁷ U.S. Climate Alliance. "<u>No Turning Back: America's Governors Confronting the Climate Crisis and Building a Brighter Future</u>." October 2024

⁸ Energy Innovation. "The Coal Cost Crossover 3.0." January 2023.

⁹ U.S. EPA. "Regulatory Impact Analysis for the 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-." April 2024.

¹⁰ U.S. EPA. "Regulatory Impact Analysis for the Proposed Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units." June 2025.

¹¹ Institute for Policy Integrity. "The Scale of Significance: Power Plants." May 2025.

¹² Data for Progress, National survey of U.S. respondents conducted from June 13-14, 2025. Published June 23, 2025.

¹³ Ibid.

¹⁴ U.S. EPA. "Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022." April 11, 2024.

¹⁵ Institute for Policy Integrity. "The Scale of Significance: Power Plants." May 2025.