



August 7, 2025

U.S. Environmental Protection Agency (EPA)  
EPA Docket Center  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**RE: Docket ID No. EPA-HQ-OAR-2025-0124. Public Comment of Center for Resource Solutions (CRS) Opposing the Repeal of Greenhouse Gas (GHG) Emissions Standards for Fossil Fuel-Fired Power Plants**

To Whom It May Concern,

On behalf of Center for Resource Solutions (CRS), we respectfully submit this comment in strong opposition to the U.S. Environmental Protection Agency's (EPA's) proposed rule titled *Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units*, published at 90 Fed. Reg. 25752 (June 17, 2025) [Docket ID No. EPA-HQ-OAR-2025-0124; RIN 2060-AW55]. In this proposed rulemaking, the EPA is proposing to repeal all greenhouse gas (GHG) emissions standards for fossil fuel-fired power plants, including those established under 40 CFR part 60 pursuant to its authority under section 111 of the Clean Air Act (42 U.S.C. § 7411). CRS joins the majority of global environmental and scientific institutions in opposing the EPA's proposed repeal. We agree with the extensive legal and technical analysis and authoritative scientific basis for the existing GHG regulations under section 111 of the Clean Air Act, supporting a finding that GHG emissions from fossil fuel-fired power plants contribute significantly to air pollution that endangers human health and welfare. We urge the Agency to maintain these existing GHG emissions standards on that basis.

CRS is a national nonprofit organization that has worked for over 25 years to support sound energy policy through technical expertise, independent analysis, and market-based solutions. We provide policymakers, regulators, and market participants with data-driven insights and tools to support reliable, transparent, and cost-effective approaches to clean energy and carbon emissions management. CRS administers the Green-e® certification programs—the leading independent certifications for renewable electricity, carbon offsets, and clean energy product transparency—which support voluntary action and ensure market integrity. We also engage with federal and state agencies, utilities, energy producers, and consumers to inform energy choices, guide program development, and evaluate environmental claims. Our work is grounded in robust standards, stakeholder engagement,

and a commitment to factual, credible information that supports efficient, practical energy decisions across jurisdictions.

### **Repealing GHG Standards Conflicts with EPA's Mission**

The proposed repeal directly contradicts the core mission of the EPA to protect human health and the environment. By removing essential climate safeguards, this proposal undermines decades of environmental and scientific progress and regulatory precedent. It disregards the EPA's own robust, scientifically grounded, and mission-consistent analysis and findings that GHG emissions from fossil fuel-fired power plants significantly contribute to air pollution that endangers public health and welfare, as originally supported by the 2015 New Source Performance Standards and reaffirmed in the 2024 Carbon Pollution Standards.

### **Climate and Public Health Harms Are Well Established**

The EPA's own 2024 regulatory impact analysis projected that the power plant standards, alongside the Inflation Reduction Act, would reduce power sector carbon pollution by over 75% from 2005 levels by 2035. These reductions are not just numbers on a page—they represent lives saved and communities protected. The health benefits alone are staggering: in 2035, an estimated 1,200 premature deaths, nearly 900 emergency room visits, and 360,000 asthma symptom cases could be avoided. From 2024 to 2047, health benefits could total \$120 billion.

2024 was the hottest year on record in the United States, with 27 billion-dollar climate disasters and over 560 lives lost. These statistics are not abstract—they represent preventable damage to American lives and livelihoods. Allowing continued carbon pollution exacerbates these risks. Recent independent modeling by Resources for the Future (RFF) confirms that repealing the Carbon Pollution Standards would result in significantly increased coal generation, up to 5.8 gigatons of additional CO<sub>2</sub> emissions by 2050, and \$198–\$855 billion in net societal costs due to elevated climate and health damages.

### **Economic Impacts and Clean Energy Disadvantage**

The economic consequences of the proposed repeal are not limited to emissions and public health. Eliminating these standards also introduces unnecessary regulatory uncertainty and long-term societal costs—burdens that will ripple through markets, public budgets, and vulnerable communities. The repeal would discard a rule that aligns market signals with the public interest and helps ensure long-term planning stability in the energy sector.

The EPA proposal also creates economic disadvantages for clean, renewable technologies that are key drivers of economic growth, investment, and job creation across the country. Solar, wind, energy storage, and other clean technologies are revitalizing communities from Texas to the Midwest. Weakening emissions standards skews the playing field in favor of outdated, heavily polluting resources, undermining the competitiveness and expansion of America's clean energy economy.

CRS has consistently documented the market, consumer, and environmental benefits of renewable energy through reports, technical guidance, and stakeholder engagement. Weakening power plant standards also weakens market signals and consumer confidence in emissions reduction claims and environmental leadership. Voluntary markets for clean energy—driven by consumers, utilities, and businesses—depend on clear, credible regulatory baselines.

### **Conclusion**

CRS joins the vast majority of environmental organizations, scientists, and health experts in opposing this proposed repeal. We urge the EPA to withdraw the proposal and uphold the 2024 Carbon Pollution Standards established under the Clean Air Act.

Repealing these standards would not only worsen climate and health outcomes—it would erode the integrity of our environmental institutions and stifle America’s transition to a cleaner, more equitable energy future.

In support of our mission, CRS will continue to provide tools, analysis, and policy expertise to help shape and support strong climate regulation and sustainable energy policy.

Thank you for the opportunity to comment.

Sincerely,

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Todd Jones

Principal, U.S. Markets