

November 2, 2026

Lee Zeldin, Administrator
U.S. Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: 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

Administrator Zeldin:

The undersigned national, state and local health organizations strongly oppose the proposed repeal of the greenhouse gas standards from power plants issued under Clean Air Act Section 111. The health professionals, patients and communities we represent understand the health harms from climate change and the greenhouse gases that fuel it, not just because of the decades of peer-reviewed research, but because of firsthand experience.

EPA's proposal states that the health impacts of climate change are global in nature. It is true that climate change poses a threat across the globe. It is also true that the United States is included in climate change's global pathway, and families across the nation are depending on their government to protect them from harm. However, EPA's proposal claims that because the problem is global, it does not warrant agency action regulating greenhouse gas emissions from power plants under the Clean Air Act Section 111. The fact that a problem is global does not make its harms any less real

for Americans, nor does it negate the obligation of EPA to reduce emissions that contribute significantly to those harms.

Climate change is a significant public health threat across the United States and EPA's proposal fails to adequately document those threats.

Climate change is already harming Americans' health across every region of the country. Worsened air quality from wildfire smoke, dust storms exacerbated by drought, increased ozone pollution under extreme heat, stronger extreme weather events and increased spread of vector-borne and water-borne diseases all put health and lives at risk. In addition to the toll taken on physical health and safety, these events create significant harmful mental health impacts.

Everyone's health is impacted, but some groups are at greater risk of suffering from the health harms of climate change. Children, older adults, people who work outside, individuals with pre-existing health conditions or who are pregnant, low-wealth communities and communities of color often experience disproportionate health harms stemming from climate change and extreme weather events.[1,2]

The Fifth National Climate Assessment (NCA5), released in 2023, described how the global warming experienced over the industrial era is unequivocally caused by greenhouse gas emissions from human activities. The chapter on public health in the NCA5 notes: "Climate change is harming physical, mental, spiritual, and community health through the increasing frequency and intensity of extreme events, higher incidences of infectious and vector-borne diseases, and declines in food and water security. These impacts worsen social inequities. Emissions reductions, effective adaptation measures, and climate-resilient health systems can protect human health and improve health equity."[3]

Health organizations have consistently called on decision makers to prioritize reductions in the emissions that cause climate change to protect the health of their patients and communities. "A Declaration on Climate Change and Health" signed by 28 national health and medical organizations includes recommendations on reducing emissions from power plants as a key step in protecting public health.[4]

Greenhouse gas emissions from fossil fuel-fired power plants significantly contribute to climate-related health harms.

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[1] U.S. EPA. ISA for PM NAAQS, 2019, Section 12.5

[2] Liu J, et al. Disparities in air pollution exposure in the United States by race/ethnicity and income, 1990–2010. Environ Health Perspect. 2021; 129(12)

[3]Crimmins, A. (., Avery, C. (., Easterling, D., Kunkel, K. (., Stewart, B. (., & Maycock, T. (. (2023). Fifth National Climate Assessment. U.S. Global Change Research Program. https://doi.org/10.7930/NCA5.2023

[4] National Health and Medical Organizations, "A Declaration on Climate Change and Health". June 2025

U.S. power plants are a major contributor to the greenhouse gases that cause climate change. The United States is the second leading global emitter of greenhouse gas emissions, and power plants are the second leading sector emitting them.

The finalized 2024 rule on carbon pollution from power plants was estimated to reduce 1.38 billion metric tons of carbon pollution through 2047, a critical step to addressing the climate crisis. Further, it was also forecast to reduce other harmful emissions from power plants at the same time, including thousands of tons of particulate matter, sulfur dioxide and nitrogen oxide pollution. Those reductions are associated with real-world health benefits. The rule estimated that in 2035 alone, 1200 premature deaths, 1900 cases of asthma onset, 360,000 cases of asthma symptoms, 48,000 school absences and 57,000 lost workdays would all be avoided – totaling $370 billion in public health benefits. EPA has repealed much of that rule, leaving these health benefits on the cutting room floor, and this proposal would further fail to prevent these health harms.

Rescinding the findings would be inconsistent with EPA's statutory mission and responsibility to protect public health and welfare.

The Clean Air Act grants EPA the authority to regulate any stationary source that "causes, or contributes significantly to, air pollution which may reasonably be anticipated to endanger public health or welfare."[5] This current proposal runs contrary to that statutory requirement. As with other recent proposals, it also does not analyze what impacts to health this regulatory action would have. The only supporting material EPA released alongside the proposal was an economic impact analysis, detailing only what the cost savings to industry would be.

By EPA refusing to acknowledge and act on reducing greenhouse gases from power plants, America's health will continue to suffer preventable harm. This proposal contradicts both the scientific record and court precedent affirming EPA's authority and responsibility to protect human health and welfare from pollution. The health and medical community strongly opposes this dangerous proposal, and urges EPA to withdraw it.

AAP Orange County Chapter
Alaska Chapter, American Academy of Pediatrics
Alaska Public Health Association
Alliance of Nurses for Healthy Environments
American Academy of Pediatrics
American Academy of Pediatrics, California
American Academy of Pediatrics, Colorado Chapter
American Academy of Pediatrics, Virginia Chapter
American Academy of Pediatrics. DC Chapter
American College of Chest Physicians
American College of Physicians
American Lung Association
American Medical Association
American Psychological Association Services
American Public Health Association

[5] 42 U.S. Code § 7411

Arizona Chapter of the American Academy of Pediatrics
Asthma & Allergy Foundation of America - Michigan Chapter
Asthma & Allergy Foundation of America, Alaska Chapter
Asthma and Allergy Foundation of America
Breathe California Sacramento Region
Breathe Southern California
California Black Health Network
California Medical Association
California Nurses for Environmental Health & Justice
California Society for Respiratory Care
Center for Environmental Health
Children's Environmental Health Network
Climate Health Now
Climate Psychiatry Alliance
Clinicians for Climate Action NJ
Cooper County Public Health Center
CPHA
Delaware Academy of Medicine and Public Health
FreshAir Collective, LLC
Hawaii Public Health Association
Healthy Air and Water Colorado
Healthy Climate New Mexico
Healthy Climate Wisconsin
Idaho Chapter of the AAP
Illinois Chapter, American Academy of Pediatrics
Indiana Public Health Association
International Society for Environmental Epidemiology-North America Chapter
Iowa Chapter of the American Academy of Pediatrics
Kansas Chapter, American Academy of Pediatrics
Maine Public Health Association
Maryland Chapter, American Academy of Pediatrics
Medical Students for a Sustainable Future (MS4SF)
Michigan Clinicians for Climate Action
Minnesota Public Health Association
Mississippi Chapter of the American Academy of Pediatrics
Mothers & Others For Clean Air
MSCCH
National Association of Pediatric Nurse Practitioners
Nevada Clinicians for Climate Action
New Mexico Pediatric Society
NH Healthy Climate
Oklahoma Public Health Association
Oncology Advocates United for Climate and Health - international
Oregon Public Health Association
Osteopathic Physicians & Surgeons of California
OUCH-Int'l (Oncology Advocates United for Climate and Change - International)
Pennsylvania Public Health Association
Physicians for Social Responsibility/Sacramento
San Bernardino County Medical Society (SBCMS)
San Francisco Bay Physicians for Social Responsibility
South Carolina Public Health Association
Tennessee Chapter of the American Academy of Pediatrics
Utah Chapter of the American Academy of Pediatrics
Utah Public Health Association
Vermont Public Health Association
Washington Chapter of the American Academy of Pediatrics
Washington State Public Health Association
Wisconsin Asthma Coalition