

## FOR IMMEDIATE RELEASE

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### **ENVIRONMENTAL JUSTICE GROUPS PROVIDE KEY FEEDBACK ON EPA GREENHOUSE GAS GUIDELINES FOR EXISTING GAS PLANTS**

NATIONAL (May 31, 2024) - This week, environmental justice groups submitted comments in response to the EPA's non-regulatory docket on Reducing Greenhouse Gas Emissions from Existing Gas Turbines at Power Plants. The feedback represents a collaborative effort across these organizations that supported an important reevaluation of the initial EPA proposal after sharing collective concerns. Their feedback focuses on ensuring the EPA adequately addresses the cumulative impacts of pollution on environmental justice communities as the Agency works on reducing climate pollution from existing gas plants. The Tishman Environment and Design Center at The New School, the Center for the Urban Environment of the John S. Watson Institute for Urban Policy and Research at Kean University, the New Jersey Environmental Justice Alliance, the Center for Earth, Energy, and Democracy (CEED), WE ACT for Environmental Justice, and the Deep South Center for Environmental Justice, along with the 23 co-signed environmental justice (EJ) organizations and alliances and 15 co-signed allied organizations and coalitions shared these comments, providing input and highlighting key priorities. Their feedback underscores that the EPA must eliminate pollution from the power sector that disproportionately and negatively impacts frontline and fence-line communities.

The Tishman Environment and Design Center at The New School, the Center for the Urban Environment of the John S. Watson Institute for Urban Policy and Research at Kean University, the New Jersey Environmental Justice Alliance, the Center for Earth, Energy, and Democracy (CEED), WE ACT for

Environmental Justice, and the Deep South Center for Environmental Justice, along with the 23 co-signed environmental justice (EJ) organizations and alliances and 15 co-signed allied organizations and coalitions, submitted comments in reference to EPA's *Existing Stationary Combustion Turbine EGUs Framing Questions for Stakeholder Input*. Final Comments [here](#).

**Dr. Ana Isabel Baptista, Tishman Environment & Design Center at The New School shared,**

“We know that a great majority of existing natural gas plants are located in environmental justice and disadvantaged communities. It is critical that the EPA take this important opportunity to put into practice its commitments to environmental justice by addressing emissions from these plants using cumulative impact approaches.”

**Dr. Nicky Sheats, Esq., Director, Center for the Urban Environment, John S. Watson Institute for Urban Policy and Research at Kean University and member of the New Jersey Environmental Justice Alliance shared,** "The recommendations contained in these comments, combined with the state implementation plans required by the power plant rule, will provide a pathway to protect overburdened environmental justice communities while achieving significant power plant emissions reductions".

**Melissa Miles, Executive Director, New Jersey Environmental Justice Alliance shared,** “The EPA has an opportunity to use a cumulative impacts analysis and a mandatory emissions reductions framework to protect overburdened communities from further harm as they attempt to curb pollution from power plants. CCS and Hydrogen Co-firing, with their potential to cause additional pollution and health harms, would never pass through these filters. The EPA has the authority and the responsibility to use them. EJ Communities have a right to clean air, regardless of zip code.”

**Byron Gudiel, Executive Director at Center for Earth Energy and Democracy (CEED) shared,**

"Too many environmental justice and disadvantaged communities bear the burden of the disproportionate impacts of pollution. EPA has a historic opportunity to right these wrongs and take an important step in protecting our communities by reducing greenhouse gas emissions in the existing power plant sector. CEED is proud to stand alongside our fellow environmental justice organizations to advocate for emissions reductions that put our communities first."

**Peggy Shepard, Co-Founder and Executive Director of WE ACT for Environmental Justice shared,**

“The EPA has an opportunity to improve the lives of environmental justice communities that bear the brunt of pollution from the power sector. Through this process, we have provided direct and applicable feedback to the EPA in order to appropriately consider the environmental justice implications for existing gas power plants. By using the tools and approaches in our

comments, including cumulative impacts analysis, we believe this guidance could improve climate outcomes while vitally protecting overburdened communities.”

**Dr. Beverly Wright, Founding Executive Director of the Deep South Center for Environmental Justice** shared, “The first rule of environmental regulation should be do no harm. Instead of relying on inherently hazardous carbon capture and storage or hydrogen co-firing, the EPA should prioritize protecting communities from the cumulative impacts of power plants, which drive respiratory disease and the climate crisis. The time is now for innovative regulation that achieves environmental and climate justice.”

The recommendations provided are applicable to the entire existing natural gas fleet, which the groups are encouraging the EPA to regulate. It includes the following:

- Excluding carbon capture and storage (CCS) and hydrogen co-firing from being deemed a “best system of emissions reduction” (BSER). Both approaches and technologies contribute to harmful co-pollutants, as well as bring myriad health and safety risks from chemical usage, pipeline explosions, and storage leaks, all of which occur against a backdrop of a deficient regulatory environment. This all leads to leaving already overburdened EJ communities subject to additional burdens and harms;
- Emphasizing the need for EPA to provide effective oversight of state compliance, with clear guidance and directives for the approval of state implementation plans (SIPs). The groups caution EPA against conceding leeway that would undercut its obligation to uphold EJ principles as well as protect the air quality, health, and environment of overburdened, frontline populations living around gas plants;
- Recommending the EPA identify power plants located in overburdened EJ communities using the government’s own existing tools and methodologies that can be adapted for this purpose, and;
- Urging EPA to 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 the community.

Environmental justice leaders have been clear: it is essential that the EPA center environmental justice communities and principles within these rules for the existing natural gas fleet. To achieve climate justice and a just energy transition, a strategy to reduce greenhouse gas emissions should not and cannot increase harm to the communities who have already paid the price of fossil fuel

infrastructure's deadly cost. EJ groups will continue to provide insights and expertise in collaboration with the EPA to produce the most equitable outcome.

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