



THE UNITED STATES
CONFERENCE OF MAYORS



August 7, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units; Docket ID No. EPA-HQ-OAR-2025-0124

Dear Administrator Zeldin,

On behalf of The U.S. Conference of Mayors and the National League of Cities, we appreciate the opportunity to submit comments on the U.S. Environmental Protection Agency's (EPA) proposed rule, "*Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units.*" **We oppose the Agency's proposed interpretation of the Clean Air Act and efforts under this rulemaking to repeal all greenhouse gas (GHG) emissions standards for fossil fuel-fired power plants. We urge you to reverse course and withdraw the proposed rule.**

Greenhouse gases are emitted by a range of industries and sectors nationwide, but the most acute effects of GHG-induced climate change are often felt in cities, towns and villages. So, too, is the financial burden associated with responding to climate disasters, preparing for future extreme weather events, and reducing community GHG emissions. In this way, cities and other local governments rely on the EPA to implement robust rules to limit GHG emissions and other harmful air pollutants originating outside their jurisdictional authority. Repealing greenhouse gas emission standards from fossil fuel-fired power plants will not only exacerbate the harm caused by climate change, but it will also harm air quality and the public health in our communities.

In its rulemaking, the Agency states that it is seeking to "make a finding that GHG emissions from fossil fuel-fired power plants do not contribute significantly to dangerous air pollution" as a justification for repealing all standards for these types of plants. This assertion not only contradicts long-standing scientific consensus that such emissions do contribute to climate change and exacerbate air pollution, but also ignores the Agency's [own recognition](#) that the U.S. electric power sector is the second-largest source of greenhouse gas emissions nationwide.

As you know, local leaders are dedicated to ensuring the overall health, safety and welfare of their residents. Cities across the United States are seeing the effects of climate change and are taking action to mitigate impacts on their residents, businesses, infrastructure and economy. Local officials serve as first responders and are on the front lines when it comes to preparing in advance of an emergency, offering immediate assistance to those impacted, and identifying strategies, solutions, and partnerships to address situations quickly and efficiently. Recent extreme weather events, such as heat waves, droughts, wildfires, floods, hurricanes and changes in other storms have brought renewed attention to the need to anticipate, prepare for and adapt to these events—across all levels of government. These events result in costly and catastrophic impacts on local and regional infrastructure, economies, public safety, public health and environmental quality.

Communities small and large across the nation are taking local action to strengthen their communities, advance action plans and invest in innovative strategies to transition towards a clean energy economy. Their implementation efforts include adopting greenhouse gas reduction goals, pioneering and deploying cost-effective clean energy solutions, and pursuing local strategies which create jobs and save both energy and taxpayer dollars. Despite the progress local governments have made, it is clear our work is not done. While cities are prepared to forge ahead on these initiatives and actions, we urge the federal government to be our partner in these efforts in support of the economy and to build resilient communities. As a significant source of GHG emissions, the power sector represents a substantial opportunity to reduce harmful air pollution and protect the environment.

Addressing the breadth and severity of climate change requires the assistance and resources from the federal government, including by setting a national policy agenda, such as a GHG standard for fossil-fuel fired power plants, that can drive economic markets toward innovative solutions. **Therefore, we urge you to withdraw the proposed rule and to commit to partnering with local leaders in addressing the urgent need to reduce greenhouse gas emissions.**

In closing, thank you for considering the perspective of local officials as you move forward. If you have any questions, please do not hesitate to contact our staff: Judy Sheahan, The U.S. Conference of Mayors (jsheahan@usmayors.org or 202-861-6775) and Carolyn Berndt, National League of Cities (berndt@nlc.org or 202-626-3101).

Sincerely,



Tom Cochran
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The United States Conference of Mayors



Clarence E. Anthony
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