Public Comment of Lynnhaven River NOW

Opposing EPA's Proposed Repeal of CO_2 Standards for Fossil-Fuel-Fired Power Plants

Docket ID: EPA-HQ-OAR-2025-0124-0001 • Comment deadline: August 7, 2025

On behalf of Lynnhaven River NOW, a Virginia Beach-based environmental nonprofit, and our 15,000 members, we object to this repeal on the following grounds:

1. **Climate-Driven Flooding Already Imperils Coastal Virginia**

The Fifth National Climate Assessment (2024) projects 16–23 inches of sea-level rise in the Southeast by 2050 (relative to 2000). NOAA's High-Tide Flooding Outlooks show Sewells Point (Norfolk/Virginia Beach) facing 85–125 flooding days per year by 2050. LRNow's 2025 *Climate-Driven Flooding* report already documents septic failures, roadway closures, and habitat loss tied to today's accelerating sea-level rise – costs that will grow with every additional ton of CO_2 emitted.

2. **Escalating National Disaster Costs**

NOAA confirms 27 separate billion-dollar weather and climate disasters in 2024, costing $182.7 billion and causing at least 568 deaths – among the worst years on record. Repealing power-plant carbon limits would only amplify such losses.

3. **EPA's Endangerment Finding Remains Legally and Scientifically Sound**

EPA's 2009 Endangerment Finding – repeatedly upheld by federal courts – states that greenhouse gases "endanger public health and welfare." The IPCC's 2023 Synthesis Report shows that limiting warming to 1.5 °C requires roughly 43 percent global emissions to be cut by 2030. Revoking power-plant CO_2 rules, therefore, conflicts with the Clean Air Act's mandate to protect health and welfare.

4. **Power Plants Are a Major – and Avoidable – Source of Climate Pollution**

EPA's inventory shows the electric-power sector emits 25 percent of total U.S. greenhouse gases. The Section 111 standards now slated for repeal were projected to avoid 617 million metric tons of CO_2 through 2042 – equal to the yearly emissions of about 137 million passenger vehicles. Declaring these emissions "not significant" defies the scientific record.

5. **Offshore Wind: A Ready, Reliable Alternative**

The Coastal Virginia Offshore Wind (CVOW) project – 176 turbines, 2.6 GW, enough power for roughly 660,000 homes, completion in 2026 – demonstrates that large-scale renewables can reliably supply electricity with zero operational CO_2 and stable long-term costs. Department of Energy and NREL analyses show wind-solar-storage portfolios are already among the least-cost options for new capacity in Virginia while enhancing grid reliability.

6. Public-Health and Equity Benefits of Retaining CO_2 Limits

Cutting fossil-plant output also reduces co-pollutants such as SO_2, NO_x, $PM_{2.5}$, and mercury – pollutants that drive asthma, cardiovascular disease, and premature death. These health burdens fall disproportionately on low-income and minority communities; maintaining CO_2 standards therefore advances both health and environmental justice.

Request for Action

Lynnhaven River NOW urges EPA to withdraw the proposed repeal and instead:

1. **Retain and strengthen Section 111 CO_2 standards for new and existing fossil-fuel EGUs;**

2. **Finalize complementary methane and hazardous-air-pollutant safeguards; and**

3. **Coordinate with DOE and FERC to accelerate deployment of clean-energy resources—especially offshore wind—that will lower costs, cut emissions, and bolster reliability.**

Coastal Virginians already pay for climate inaction through chronic flooding, infrastructure damage, and rising insurance costs. Rolling back proven carbon-pollution standards will deepen these harms and violate EPA's statutory duty to protect public health and welfare.

Respectfully submitted,

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