



**PEAK Coalition**  
**Statement on EPA Power Plant Rules**  
**May 11, 2023**

*The PEAK coalition—UPROSE, THE POINT CDC, New York City Environmental Justice Alliance (NYC-EJA), New York Lawyers for the Public Interest (NYLPI), and Clean Energy Group (CEG)— aims to end the long-standing pollution burden from power plants on the city's most climate-vulnerable people. This coalition is the first comprehensive effort in the US to reduce the negative and racially disproportionate health impacts of a city's peaker plants by replacing them with renewable energy and storage solutions.*

**PEAK Coalition is gravely concerned about the environmental justice implications of the EPA's proposed power plant rules. EPA's approach to establishing pollution standards based on technologies such as carbon capture and sequestration/storage (CCS), low-GHG hydrogen co-firing, and natural gas co-firing is counterproductive to reducing emissions and protecting the environment.**

Achieving an emissions-free power sector must not be done in a matter that continues the disproportionate burden fossil fuel generation facilities have on environmental justice communities. Unproven solutions like hydrogen combustion or carbon capture are detrimental to the environmental justice goals set out by the Biden administration and divert necessary funding away from renewable energy and battery storage development that will truly lower emissions. These false solutions have limited efficacy and dangerous consequences, especially as these technologies cannot prevent and could increase co-pollutant emissions and fine particulates.

Additionally, EPA's failure to propose more stringent standards for inefficient power plants that run at times of peak demand will be disastrous for environmental justice communities. Peaker power plants are costlier and emit higher rates of emissions than most baseload and intermediate power-generating facilities. The public health ramifications of giving peaker plants more leeway to pollute are unacceptable for low-income and people of color communities where these plants are typically sited. Instead, EPA should rely on proven solutions such as battery co-siting or other non-combustion alternatives to reduce power plant emissions before a full, just transition to renewable energy and energy storage.

**PEAK Coalition urges the EPA to revise the proposed power plant rules so that it aligns with the administration's commitment to environmental justice. The opportunity is now to conduct a just transition by properly regulating emissions from the power sector while investing in renewable and storage solutions that align with the needs and prioritize the health of our climate and communities.**