



DATE: November 3, 2025

TO: Administrator Lee Zeldin - U.S. Environmental Protection Agency

FROM: GreenLatinos, WE ACT for Environmental Justice and Climate Justice Alliance

SUBJECT: Proposed Repeal and Suspension of the Greenhouse Gas Reporting Program and Subpart W Requirements for the Oil and Natural Gas Sector, Docket ID No. EPA-HQ-OAR-2025-0186

On behalf of GreenLatinos, WE ACT for Environmental Justice, the Climate Justice Alliance, and **over 140** Environmental Justice, Tribal, and allied organizations, we submit this public comment in strong opposition to EPA's proposed repeal and weakening of the Greenhouse Gas Reporting Program (GHGRP).

This proposal represents a severe rollback on environmental transparency and the public's right to know. It would obscure emissions and pollution data that every community depends on to protect their health, undermine accountability of the fossil fuel industry, and erode decades of climate progress. We urge EPA to withdraw this proposal in its entirety and reaffirm its duty to protect human health and the environment.

1. The Greenhouse Gas Reporting Program Is a Cornerstone of Climate Accountability

The GHGRP, established in 2009 under clear direction from Congress¹, is the nation's most comprehensive and transparent system for tracking greenhouse gas emissions. For over fifteen years, it has provided the only publicly available, facility-level data covering emissions across nearly every sector of the U.S economy.²

This data is essential for federal and state decision-making. Agencies such as the EPA, the Department of Energy, and the Department of the Treasury rely on GHGRP Data to implement

¹ "Of the funds provided in the Environmental Programs and Management account, not less than \$3,500,000 shall be provided for activities to develop and publish a draft rule not later than 9 months after the date of enactment of this Act, and a final rule not later than 18 months after the date of enactment of this Act, to require mandatory reporting of greenhouse gas emissions above appropriate thresholds in all sectors of the economy of the United States." PUBLIC LAW 110-161—DEC. 26, 2007.

² Environmental Protection Agency, [Greenhouse Gas Reporting Program Report](#), 2022.

climate policies, allocate clean-energy tax credits, and ensure accountability in major public investments³. States such as California⁴ and Alaska⁵, along with local governments, use this data to design climate strategies and track progress toward emissions-reduction goals.

Repealing or suspending Subpart W⁶, which covers methane emissions from the oil and gas sector, would critically weaken our nation's ability to track, manage, and reduce climate pollution. Without the program, regulators, researchers, and communities would lose access to accurate, facility-specific information that identifies who is emitting, how much, and where.

Transparency is not a bureaucratic burden; it is a fundamental pillar of public trust and accountability. Reliable, accessible data allows policymakers to act decisively, businesses to plan responsibly, and the public to understand the scope and sources of climate pollution. When transparency is eroded, confidence in both government and industry diminishes, and those most exposed to pollution are left without the tools to respond or advocate for protection.

A strong transparent GHGRP is therefore not just a technical reporting requirement; it is a cornerstone of democratic governance that ensures climate action remains guided by facts, integrity, and public oversight.

2. Environmental Justice Communities Rely on Public Data for Protection

Repealing the GHGRP would disproportionately harm Latino, Black, Indigenous, and low-income communities who already live on the frontlines of fossil fuel extraction, refining, and industrial activity. Nationally, more than 1.6 million Latinos and 1 million Black Americans live within half a mile of oil and gas wells, where exposure to methane and co-pollutants such as benzene, formaldehyde, and ethylbenzene increases the risks of cancer, low birth weight, and impaired lung function⁷. These communities are also most vulnerable and hardest hit from the impacts of climate change.⁸

Environmental justice communities depend on transparent data to understand the sources of pollution affecting their health, advocate for cleaner air, and hold both government and industry

³ Harvard Law School Environment & Energy Law Program, [EPA Proposes to End Greenhouse Gas Reporting](#), September 30, 2025.

⁴ California Air Resources Board, [California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators](#), 2024.

⁵ Department of Environmental Conservation of the State of Alaska, [Emission Inventory Information](#), 2020.

⁶ Environmental Protection Agency, [Subpart W - Petroleum and Natural Gas Systems](#), 2025.

⁷ Lesley Fleischman & Marcus Franklin, *Fumes Across the Fence-Line: The Health Impacts of Air Pollution from Oil & Gas Facilities on African American Communities* (Clean Air Task Force & Nat'l Ass'n for the Advancement of Colored People, 2017).

⁸ EPA. 2021. Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts. U.S. Environmental Protection Agency, EPA 430-R-21-003. <https://www.epa.gov/cira/population-specific-summaries>

accountable. EPA's own FLIGHT⁹ database and GHGRP data provide one of the only accessible tools for residents and public-interest groups to identify local emitters and monitor trends in climate pollution. Without access to this information, residents lose one of the only tools they have to track emissions near their homes and schools.

Methane pollution is never emitted alone. It comes with toxic co-pollutants such as benzene, toluene, formaldehyde, and ethylbenzene, all linked to cancer, asthma, cardiovascular disease, and other conditions that can result in premature death. These emissions degrade air quality and compound the health burdens already faced by Latino, Black, Indigenous, and low-income working-class communities, which experience higher rates of respiratory illness and cumulative exposure from multiple pollution sources¹⁰.

As discussed in the previous section, these same communities are disproportionately located near oil and gas operations covered under Subpart W of the GHGRP. Recent analyses underscore the scale of these public-health impacts. A 2023 study by the Boston University School of Public Health found that air pollution from the oil and gas sector contributes to 7,500 premature deaths and 410,000 asthma attacks every year, with the greatest impacts in communities of color and low-income working-class areas.¹¹

These outcomes reflect long-standing health inequities documented in national studies:

- Latino children experience 40 percent higher asthma rates than white children, and communities of color breathe 63 % more air pollution than white communities.
- Black seniors die from PM2.5-related exposure at triple the rate of other racial groups.¹²
- Indigenous populations face some of the highest per-capita health impacts from oil and gas-related air pollution, alongside Black, Hispanic, and Asian communities¹³
- In Louisiana's "Cancer Alley", a predominantly Black community¹⁴, cancer risks from industrial air pollution are nearly 50 times the national average.

⁹ Environmental Protection Agency, [Facility Level Information on GreenHouse gases Tool \(FLIGHT\)](#), 2024.

¹⁰ Christopher W. Tessum et al., PM2.5 polluters disproportionately and systemically affect people of color in the United States. *Sci. Adv.* 7, eabf4491 (2021). DOI: [10.1126/sciadv.abf4491](#)

¹¹ Buonocore et. al, ["Air pollution and health impacts of oil and gas production in the United States."](#) *Environmental Research: Health*, May 8, 2023 and the protective actions they inform.

¹² Environmental Defense Fund, [Analysis of PM2.5-Related Health Burdens Under Current and Alternative NAAQS](#), 2023

¹³ Karn Vohra et al., The health burden and racial-ethnic disparities of air pollution from the major oil and gas lifecycle stages in the United States. *Sci. Adv.* 11, eadu2241 (2025). DOI: [10.1126/sciadv.adu2241](#)

¹⁴ 7 University Network for Human Rights, ["Waiting to Die: Toxic Emissions and Disease Near the Louisiana Denka/DuPont Plant."](#), 2019.

- In California, methane super-emitters are disproportionately located near Black, Latino, and Native American neighborhoods.¹⁵

The GHGRP provides foundational data that makes these findings, and the protective action they inform, possible. GHGRP has been used as the basis for the U.S. Greenhouse Gas Inventory, which has played a critical role in Clean Air Act standards that, in addition to oil and gas facilities, regulate emissions power plants, landfills, and transportation, among other sectors. By obscuring GHGRP data, the EPA would make it harder to identify and mitigate these risks, effectively downplaying the level of environmental racism and further entrenching air pollution's negative impact on public health, especially for frontline communities .

3. Obscuring Data Undermines Civil Rights and Climate Commitments

Transparent, publicly available climate data is not only a technical requirement, it is a foundation of democratic accountability and effective climate governance. Without access to credible emissions information, neither impacted communities, the public or policymakers can verify whether the United States is meeting its climate commitments or holding major polluters accountable.

Facility-level greenhouse gas data underpins the credibility of national climate targets and the integrity of programs established under the Inflation Reduction Act. It allows independent researchers, journalists, and watchdogs to evaluate progress and identify discrepancies between stated goals and real-world outcomes. Removing this visibility would weaken both domestic oversight and the United States' standing as a transparent, science-based climate leader.

Globally, the principle that environmental information must be open to the public is well established in the *Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (The Aarhus Convention)*¹⁶, adopted by 47 countries across Europe and Central Asia. While the United States is not a Party to this treaty, its core values are reflected in U.S. law. The Freedom of Information Act (5 U.S.C § 552)¹⁷ affirms that government records belong to the people and directs federal agencies to make them available “to the greatest extent possible”.

Upholding these standards is essential to protect both the credibility of the U.S and the rights of communities to participate in decisions that shape their future.

¹⁵ Weller, Z. D., Im, S., Palacios, V., Stuchiner, E., & von Fischer, J. C. [*Environmental Injustices of Leaks from Urban Natural Gas Distribution Systems: Patterns among and within 13 U.S. Metro Areas. Environmental Science & Technology*](#), 2022.

¹⁶ United Nations Economic Commission for Europe, [*Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters*](#), 1998.

¹⁷ Freedom of Information Act, [5 U.S.C. § 552](#),

5. Economic and Climate Consequences

Repealing the GHGRP would destabilize clean energy markets and waste billions in taxpayer dollars. Federal programs like the Methane Emissions Reduction Program depend on GHGRP data to verify emissions and allocate funding.¹⁸ Eliminating that data risks massive misallocation of public funds and loss of market credibility for U.S. industries.

Transparent, verifiable data also drives innovation and competitiveness. Investors and companies use GHGRP data to measure performance and identify opportunities to reduce emissions. Some oil and gas operators have used this data to prioritize methane mitigation strategies, such as leak detection and repair, deployment of advanced monitoring technologies, and reduction of flaring, cutting both pollution and operational costs.

6. EPA's Proposal Is an Attack on Science and Justice

EPA's justification for this rollback, framed as a way to "reduce burdens", is scientifically and morally indefensible. Hiding emissions data does not reduce burdens; **it conceals harm**. It betrays EPA's statutory mission to protect human health and the environment, and it prioritizes polluters over people.

This proposal follows a troubling pattern of deregulation that includes attempts to delay methane rules and roll back other clean air regulations, weaken the Greenhouse Gas Endangerment Finding, and erode National Environmental Policy Act protections, all actions that disproportionately harm environmental justice communities. Repealing the GHGRP would be yet another step backward, erasing one of the most critical tools we have to combat the climate crisis.

Environmental justice begins with truth. Communities have the right to know what pollutes their air and alters their climate. The Greenhouse Gas Reporting Program is not simply a data system; it is a lifeline of accountability for those living closest to harm and on the frontlines of the climate crisis. EPA must uphold transparency, restore public trust, and ensure that the nation's climate policies protect all communities, not just the most powerful.

We urge EPA to reject this repeal and reaffirm its commitment to science, equity, and justice.

Respectfully submitted,

GreenLatinos

¹⁸ Congressional Research Service, "[Methane Emissions: US and International Mitigation Efforts](#)," May 6, 2025.

WE ACT for Environmental Justice
Climate Justice Alliance

Environmental Justice & Tribal Organizations

350 Conejo / San Fernando Valley

350Hawaii

Alaska Community Action on Toxics

Berks Gas Truth

Better Brazoria: Clean Air and Water

Better Path Coalition

Cherokee Concerned Citizens

Coalition to Protect New York

Commission Shift

Community Housing and Empowerment Connections Inc.

Detroit Black Community Food Sovereignty Network

Don't Waste Arizona

Duwamish River Community Coalition

Earth Ethics, Inc.

environmental justice ministry cedar lane unitarian universalist congregation

Fenceline Watch

GAIA (Global Alliance for Incinerator Alternatives)

Great Plains Action Society

GreenRoots

Harambee House, Inc.

Hip Hop Caucus

Just Transition Northwest Indiana

Larimer Alliance for Health, Safety, and the Environment

Metro East Green Alliance

Micah Six Eight Mission

Midwest Building Decarbonization Coalition

New Jersey Environmental Justice Alliance

New Mexico Climate Justice

North American Water Office

North Dakota Native Vote

Pennsylvania Interfaith Power & Light

PSR PA

RiSE for Environmental Justice

Save San Pascual Park

SEE (Social Eco Education)

Sowing Justice

Sunflower Alliance
Texas Environmental Justice Advocacy Services
The Alliance for Appalachia
The Healthy Environment Alliance of Utah
Unitarian Universalists for a Just Economic Community
Unite North Metro Denver
Young, Gifted & Green
Zero Hour

Allied Organizations

350 Bay Area Action
350 Chicago
350 Deschutes
Advocates for Snake Preservation
AFGE Local 704
Alaska Community Action on Toxics
American Friends Service Committee
Animals Are Sentient Beings, Inc.
ARTivism Virginia
Between the Waters
Bright Beat
Campaign for Renewable Energy
Carolina Ocean Alliance
Center for Biological Diversity
Center for International Environmental Law
Change the Chamber
Chesapeake Climate Action Network
Clean Energy Action
Climate Reality Greater Maryland
Climate Reality Project - Northern Colorado Chapter
Colorado Coalition for a Livable Climate
Colorado Jewish Climate Action
Concerned Health Professionals of Pennsylvania
Downwinders at Risk
Earthjustice
Eco-Justice Collaborative
Elders Climate Action
Elders Climate Action Maryland
Elders Coalition for Climate Action
Elders' Climate Action - Maryland

Environmental Law & Policy Center
Family Farm Defenders
FoCo Trash Mob
Food & Water Watch
FreshWater Accountability Project
Friends of the Earth US
Healthy Ocean Coalition
IH RISE
Illinois Environmental Council
Institute for Policy Studies Climate Policy Program
International Marine Mammal Project of Earth Island Institute
Intheshadowofthewolf
Jewish Climate Action Network NYC
Just Zero
Kentuckians for single-payer healthcare
Kentucky Conservation Committee
Latino Outdoors
League of Conservation Voters
Media Alliance
Memphis APRI
Mennonite Central Committee U.S.
Mi Familia Vota
Milwaukee Riverkeeper
Montana Environmental Information Center
Monterey Bay Aquarium
Nassau Hiking & Outdoor Club
No False Climate Solutions PA
North American Climate, Conservation and Environment(NACCE)
Northeast Organic Farming Association of New Hampshire (NOFA-NH)
Nuclear Energy Information Service (NEIS)
Occupy Bergen County
Ocean Conservation Research
Oil and Gas Action Network
Pennsylvania Immigration Coalition
Physicians for Social Responsibility Colorado
Plastic Pollution Coalition
Protect Penn-Trafford (PT)
Puente Latino Association
Resilient Denver
Resource Renewal Institute

Respiratory Health Association
Responsible Alpha
Rise Up WV
San Luis Valley Ecosystem Council
Save Our Illinois Land
South Shore Audubon Society
TAO
The Last Plastic Straw
Third Act Colorado
Union of Concerned Scientists
Unitarian Universalists for Social Justice
Urbecon LLC
Utah Physicians for A Healthy Environment
Voices for Progress
Wildlife for All