

Commitment to a Cleaner Future: A Selection of Public Comments on the EPA's Clean Power Plan

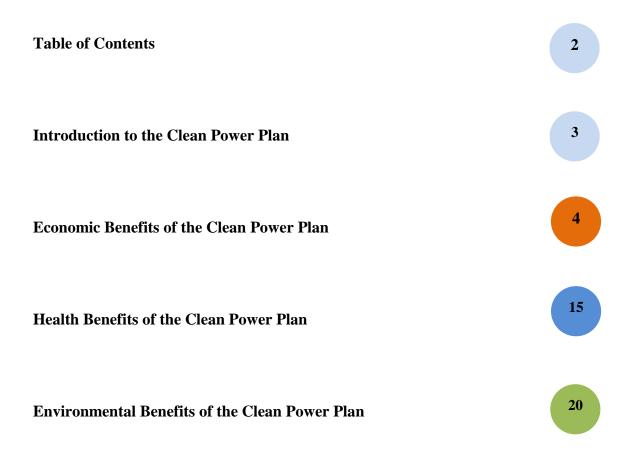
Compiled by the Minority Staff For Democratic Members of the Committee on Science, Space & Technology U.S. House of Representatives

November 2015

Photo from Green Clean Earth: http://greencleanearth.weebly.com

Commitment to a Cleaner Future:

A Selection of Public Comments on the EPA's Clean Power Plan (CPP)



Introduction to the EPA's Clean Power Plan

Power plants are the largest source of greenhouse gas (GHG) emissions in the United States, accounting for roughly one-third of all U.S. GHG emissions. In 2010, coal-fired power plants alone represented 27 percent of total U.S. greenhouse gas emissions. In 2013, in the U.S. total GHG emissions were composed of 3 percent fluorinated gases, 5 percent nitrous oxide, 10 percent methane and 82 percent carbon dioxide (CO2), which resulted in the release of 6.7 million metric tons of CO2.

Greenhouse gases trap heat in our atmosphere which results in a warmer climate. Human activities, particularly the burning of fossil fuels, which release carbon dioxide gas into the atmosphere, are the primary causes of global warming. A warming climate leads to more extreme weather events, rising sea levels and acidification of the ocean among other things. The scientific consensus is that climate change will increase the frequency and severity of floods, fires and droughts. As temperatures rise heat-related illnesses and deaths are likely to increase as well. These warming trends also impact wildlife, agriculture production and geography, particularly in coastal areas. In short, greenhouse gases threaten human health, agriculture production, wildlife habitats and damage U.S. and global infrastructures.

In June 2013, in response to these growing threats, President Obama unveiled his Climate Action Plan, a "broad-based plan to cut the carbon pollution that causes climate change and affects public health," in order to address and mitigate the impacts of climate change. As part of that plan, the President directed the Environmental Protection Agency (EPA), under the authority of the Clean Air Act (CAA), to cut carbon emissions from both new and existing power plants.

On August 3, 2015, the EPA released its final Clean Power Plan (CPP) rule, which aims to cut carbon emissions from the power sector by 32 percent by the year 2030 compared to 2005 levels. Specifically, the rule establishes carbon emission performance rates for two subgroups of power plants, fossil steam units (largely coal-fired plants) and natural gas combined cycle units.

EPA estimates the climate and health co-benefits of the rule at \$20 billion and \$14 to \$34 billion per year in 2030, respectively, with the cost of compliance estimated at \$5.1 to \$8.4 billion per year in 2030 (benefit and cost numbers are estimated in 2011 dollars). The estimated health cobenefits include the avoidance of 1,500 to 3,600 premature deaths, 90,000 asthma attacks in children, and 300,000 missed school and work days. Additionally, EPA estimates that by 2030, increasing the use of energy efficiency measures will lower electricity bills by \$7 per month.

EPA received more than 4 million comments on the proposed Clean Power Plan (CPP) rule and it made a number of changes in response to those comments in the final rule. Many of the comments offer guidance as well as support for the Administration's efforts to curb greenhouse gas emissions. Public comments were submitted to the public docket at <u>www.regulations.gov</u> regarding this rule, known as the "<u>Carbon Pollution Emission Guidelines for Existing Stationary</u> <u>Sources: Electric Utility Generating Units</u>." The comments below include a small fraction of those submitted and include comments in support of the rule by notable industry leaders and other interested parties, such as the Advanced Energy Economy, Philips, National Grid, Consumers Union, Gap, Inc., General Mills, Inc., Staples Inc., The Dannon Company Inc., Levi Strauss & Co., Schneider Electric and the American Lung Association and American Academy of Pediatrics.

Economic Benefits of the Clean Power Plan

WE CAN ADDRESS CLIMATE CHANGE, WITH GREAT BENEFIT TO FUTURE GENERATIONS AND OUR ECONOMY



SETTING THE FIRST-EVER NATIONAL CARBON LIMITS...will cut America's dangerous carbon pollution by 531 million tons.¹



USING SMART STRATEGIES... we can put more than 274,000 people to work in efficiencyrelated jobs.



AND THAT WILL SAVE U.S. HOUSEHOLD ELECTRIC CUSTOMERS... \$13 billion, or \$103 per average household.

All figures for 2020

WE MUST ACT NOW TO MEET THE ENVIRONMENTAL CHALLENGE OF OUR TIME

http://www.vocesverdes.org/in-the-news/581/clean-power-plan-fact-sheet



www.philips.com

Mission

Philips is the world leading developer of energyefficient lighting solutions. It is dedicated to introducing innovative, energy-efficient solutions and applications for both professional and consumer markets. In April 2014, for the second year in a row, EPA awarded the company with the Product Manufacturer top honors, naming Philips the Energy STAR Partner of the Year.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-23082

Philips Electronics North America

Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 1, 2014

"Philips applauds EPA's thoughtful and wide-ranging proposal to limit carbon dioxide emissions in the electric power sector,

"Philips applauds EPA's thoughtful and wideranging proposal to limit carbon dioxide emissions in the electric power sector, and thanks the EPA for this effort to achieve our common goal of providing clean energy to power America. ... and thanks the EPA for this effort to achieve our common goal of providing clean energy to power America. ...

In 2013, lighting technologies were responsible for 17% of total U.S. electricity... While the electricity consumed by the lighting sector is significant, the

adoption of LEDs based on anticipated improvements in LED technology efficacy as well as established technology diffusion rates present equally significant energy savings potential and GHG abatement tool.

... In 2014, American Council for an Energy Efficiency Economy concluded a survey of existing studies ... and found considerable potential savings from lighting, even after the effects of federal lighting standards were incorporated, in the range of 8-77% of total maximum achievable potential savings for the residential sector and 34-63% for the commercial sector.

Extensive research and practical results from existing energy efficiency (EE) programs continue to demonstrate reducing carbon emissions through EE measures cost significantly less than through other means. In fact, a number of studies have concluded that EE programs deliver economic benefits of \$2 to \$4 (or more) for each \$1 invested, on average. ...

The adoption of energy efficient lighting technologies like LEDs have – and will continue to – increasingly contribute to GHG emission reductions through state-level EE programs. Based on recent analyses by DOE and ACEEE, the adoption of LED technologies alone could account for a 30% reduction in GHG emissions by 2030."



www.aee.net

Mission

Advanced Energy Economy represents more than 1,000 companies and organizations that span the advanced energy industry, including the areas of energy efficiency, demand response, natural gas, wind, solar, smart grid, nuclear power, and advanced transportation systems. AEE works to make energy secure, clean, and affordable through policy advocacy at the federal, state, and regulatory levels.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-22276

Malcolm Woolf Advanced Energy Economy Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

November 5, 2014

"AEE is a national organization of businesses making the energy we use secure, clean, and affordable. Thanks to technological advances and innovation, we now have more options for meeting energy needs than ever before in history.

... AEE strongly supports the Clean Power Plan as a vital step

toward modernizing the U.S. electric power system for greater efficiency, reliability, and economic opportunity, while achieving the Plan's goal of reducing carbon emissions.

AEE strongly supports the Clean Power Plan as a vital step toward modernizing the U.S. electric power system for greater efficiency, reliability, and economic opportunity, while achieving the Plan's goal of reducing carbon emissions.

AEE believes that the Clean Power Plan will drive investment in an electric power system sorely in need of improvement. Our existing power system is facing serious challenges as innovations disrupt old ways of doing business, infrastructure shows its age, and customers demand new forms of service. ...

The Clean Power Plan's incorporation of 'beyond the fence line' advanced energy technologies, which are in widespread use at reasonable cost today, will allow states to adopt policies that capture the carbon reduction and economic benefits of these technologies ... Given the array of relevant technologies and the flexibility for states to use their available resources, AEE believes that the EPA-determined state-by-state goals will be easy to achieve, both technologically and economically." NCLC[®] NATIONAL CONSUMER LAW CENTER[®]

www.nclc.org/

Mission

The National Consumer Law Center uses its expertise in consumer law and energy policy to work for consumer justice and economic security for lowincome and other disadvantaged people. NCLC works with nonprofits, legal organizations, and policymakers across the nation to advance economic fairness.

ConsumersUnion°

www.consumersunion.org/

Mission

Consumers Union is the policy and action division of Consumer Reports. They work with activists to pass consumer protection laws in states and in Congress, going after corporations who are doing wrong by their customers and encouraging companies that are heading in the right direction.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-23969

Shannon Baker-Branstetter On behalf of **National Consumers Law Center** and **Consumers Union** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 1, 2014

"Consumer groups support EPA's proposed Clean Power Plan to establish state-specific emission reduction targets and encourage state-initiated plans conforming with Section 111(d) of the Clean Air Act. ... EPA's [proposed] 'building blocks,' ... offers states flexibility to reduce carbon pollution while diversifying the energy supply, ensuring reliability, and protecting affordability. ...

"Consumer groups support EPA's proposed Clean Power Plan to establish statespecific emission reduction targets and encourage stateinitiated plans conforming with ... the Clean Air Act. ... EPA's [proposed] 'building blocks,' ... offers states flexibility to reduce carbon pollution while diversifying the energy supply, ensuring reliability, and protecting affordability.

A hotter planet will see changed and intensified storm patterns, diminished fresh water resources. and increased ozone pollution. Fisheries, farms, watersheds, oceans, forests and other ecosystems will all be affected, in turn impacting food production and prices, as well as air and water quality. Worsened air quality and heat waves harm

public health and increase health care costs. Higher energy demand in some regions for cooling, water delivery, and food production will tax the electrical grid and transportation systems. Intensified competition for water threatens not only drinking water supplies, but also places pressure on the energy sector, whose power plants require large amounts of water for cooling.

... Many of the states that have the highest emission levels of carbon pollution also have the most inefficient electricity utilization and delivery. ... This means that states with the most room for improvement have a vast and affordable resource to cut emissions before they even look to the other building blocks."



www.ohioenvironmental council.org

Mission

The mission of the Ohio Environmental Council is to secure healthy air, land and water for all who call Ohio home. Using legislative initiatives, legal action, scientific principles, and statewide partnerships, they work to secure a healthy environment for Ohio's families and communities.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-35984 Brennan Howell On behalf of the **Ohio Environmental Council** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

October 2, 2015

"[The Clean Power Plan] is a significant first step in preventing a future that scientists predict will include more intense and more frequent heat waves, droughts, extreme weather events and algal blooms. The proposed carbon pollution reductions in Ohio will help ensure our state is not contributing to what would otherwise be a global catastrophe, with substantial local impacts. ...

Preserving the Clean Power Plan's proposed emission reductions will provide substantial benefits to all Americans.

Nationally, the Clean Power Plan is estimated to produce \$48 billion to \$82 billion in climate and health benefits, according to the U.S. EPA. ... The Clean Power Plan will also continue to grow Ohio's clean

[T]he Clean Power Plan's proposed emission reductions will provide substantial benefits to all Americans. Nationally, the Clean Power Plan is estimated to produce \$48 billion to \$82 billion in climate and health benefits ...

energy economy, which is already responsible for an estimated 25,000 jobs and more than \$1 billion in savings for electricity consumers. ...

The Ohio wind industry provides a good example of how supporting clean energy can act as an economic stimulus. Over 432 megawatts of wind energy have been installed in Ohio which has led to between 2,000 to 3,000 direct and indirect jobs, \$775 million in capital investment, annual property tax payments over \$2.6 million, and annual land lease payments of over \$2.5 million. ...

The Clean Power Plan is not only a crucial opportunity for Ohio and the nation to reduce its carbon pollution, but it also is an opportunity to continue Ohio's transformation to a clean energy economy."



www.environmentamerica

Mission

Environment America is a federation of state-based, citizen-funded environmental advocacy organizations. With funding from donations, they research the challenges confronting the environment and educate the public about the findings. They seek to raise awareness of environmental issues and promote sensible solutions.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HO-OAR-2013-0602-22946

Environment America

Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 6, 2014

"Global warming is already causing real damage to Americans' economy, public health, and way of life. But it's not too late to prevent the worst impacts of global warming and leave our kids with a cleaner, healthier future. ...

Ultimately, America must set a course to replace its dirty coaland gas-fired plants with renewable energy. Renewable energy is cost-effective and ready to deploy today, and can provide a pathway for EPA to further strengthen the Clean Power Plan by achieving reductions of 40 percent by 2030.

... Environment America enthusiastically supports the Clean

Ultimately, America must set a course to replace its dirty coaland gas-fired plants with renewable energy. Renewable energy is cost-effective and ready to deploy today

Environment America enthusiastically supports the Clean Power Plan, EPA's proposal to cut carbon pollution from America's fleet of fossil fuel-powered power plants.... Power Plan, EPA's proposal to cut carbon pollution from America's fleet of fossil fuelpowered power plants, the single largest source of America's global warming pollution. Renewable energy can play a primary role in reducing U.S. carbon emissions.

For example, under reasonable growth assumptions based on recent historical trajectory and price trends, America could get 10 percent of its power from the sun and 30 percent from wind energy within 15 years. ...

Renewable energy is cost-effective. From 2010 to 2013, the cost of solar panels fell by 35 percent, and wind energy is the cheapest form of new generation in many parts of the country. A recent study by the Union of Concerned Scientists found that the updated cost and growth models in building block 3 could allow the Clean Power Plan to achieve 40 percent reduction [by 2030] well within the constraints of 111(d)."



http://www.aspenpitkin.com /Living-in-the-Valley/Green-Initiatives/Canary-Initiative/

Mission

The Canary Initiative of the City of Aspen is so named because Aspen's reliance on snow for tourism and water supply makes it a 'canary in the coal mine' for climate change. The Initiative put forward a comprehensive plan to address global warming at regional, state, and national levels.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-23508 Chris Menges, Ashley Perl, and Steven Skadron On behalf of the **Canary Initiative** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 9, 2014

"The City [of Aspen, Colorado] believes that the proposed [EPA] regulations are a necessary, flexible, achievable, fair and beneficial step in the right direction in mitigating the costly and damaging impacts of unchecked climate change. Finalization and enforcement of the proposed Rule is a domestic imperative, and would provide a greater change of further negotiating the types of international commitments necessary to adequately address the magnitude of global emissions and climate risks. ...

Our tourism-dependent economy relies directly on snowfall, and healthy streams and forests, each of which requires stable climate conditions. Since 1940 the Aspen area has experienced

a 2°F increase in annual average temperature, and the summertime frost-free period has lengthened by more than a month. ...

"The City [of Aspen, Colorado] believes that the proposed [EPA] regulations are a necessary, flexible, achievable, fair and beneficial step in the right direction in mitigating the costly and damaging impacts of unchecked climate change. ...

... Aspen is confident that the CPP would save consumers money, ... Aspen is confident that the CPP would save consumers money, improve public health and reduce GHG emissions. ... The Clean Power Plan is a great deal at the right time, and the City of Aspen is proud to encourage its timely implementation."

improve public health and reduce GHG emissions. EPA estimates that electricity bills will be 8% lower by 2030 and that the Plan will generate \$7 in health benefits for every \$1 invested – similar to America's experience with the CAA since 1970. ... The Clean Power Plan is a great deal at the right time, and the City of Aspen is proud to encourage its timely implementation."



http://e2.org

Mission

Environmental Entrepreneurs (E2) is a nonpartisan, national community of business leaders who promote sound environmental policies that grow the economy. Its members are entrepreneurs, investors, and professionals from every sector of the economy who collectively have been involved in the financing, founding or development of more than 1,700 companies that have created more than 570,000 iobs.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-23183 Dan Abrams On behalf of **Environmental Entrepreneurs** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 1, 2014

"... [E2 writes] in support of EPA's proposed Clean Power Plan which promises to be the most important action on climate change undertaken by the United States government to date. ... The Clean Power Plan will be the cornerstone of U.S. leadership on climate change and serve as the key market driver in U.S. clean energy growth for the next several decades, so it is important to target the highest feasible standards.

... If states propose strong plans, it would provide the clear market signals businesses, entrepreneurs and investors are looking for to further invest in the state and position the U.S. as

By ensuring American leadership on climate and clean energy policy, the innovations we develop domestically will also be the products and services we export to the expanding international market for clean energy, a multi-trilliondollar opportunity. U.S. manufacturers can be the leading global suppliers of cleaner cars, cleaner fuels, cleaner power, and technologies that improve industrial, power plant and building efficiency... As the world's strongest economy, American can and must lead in this arena.

an international leader on clean energy. ...

By ensuring American leadership on climate and clean energy policy, the innovations we develop domestically will also be the products and services we export to the expanding international

market for clean energy, a multi-trillion dollar opportunity. U.S. manufacturers can be the leading global suppliers of cleaner cars, cleaner fuels, cleaner power, and technologies that improve industrial, power plant and building efficiency... As the world's strongest economy, American can and must lead in this arena. The Clean Power Plan is an important step in meeting this obligation."



http://www.ceres.org/

Mission

Ceres is a non-profit organization advocating for sustainability leadership. They mobilize a network of investors, companies and public interest groups to accelerate and expand the adoption of sustainable business practices and solutions to build a healthy global economy.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-35717

The statement was provided on behalf of more than 360 companies and investors across the U.S., including:



Ceres On behalf of 360+ undersigned companies and investors Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

August 28, 2015

"We, the undersigned companies and investors, have a significant presence in your state and strongly support the implementation of the Environmental Protection Agency's Carbon Pollution Standards for existing power plants. [The Clean Power Plan is] critical for moving our country toward a clean energy economy. ...

Our support is firmly grounded in economic reality. Clean

energy solutions are cost effective and innovative ways to drive investment and reduce greenhouse gas emissions. ... In 2014, a study by Ceres, **Calvert Investments** and the World Wildlife Fund revealed that 60 percent of Fortune 100 companies have set their own clean energy targets and have saved more than \$1 billion a year in the process.

We are already experiencing increased frequency and intensity of storms, warmer temperatures, extreme "We ... strongly support the implementation of the [EPA's] Carbon Pollution Standards for existing power plants. [The Clean Power Plan is] critical for moving our country toward a clean energy economy. ...

Our support is firmly grounded in economic reality. Clean energy solutions are cost effective and innovative ways to drive investment and reduce greenhouse gas emissions. ... 60 percent of Fortune 100 companies have set their own clean energy targets and have saved more than \$1 billion a year in the process.

precipitation, and changes in weather patterns that will continue to put trillions of dollars of institutional investors' assets at risk.... [W]e seek a greater degree of policy certainty in order to better manage these risks.... Evidence shows that emission reductions can be achieved without long-term economic harm or damage to the reliability of our electricity system."

national**grid**

www.nationalgridus.com

Mission

National Grid is international electricity and gas company based in the UK and northeastern US. It delivers electricity and gas to nearly 7 million customers in Massachusetts, New York and Rhode Island.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-24299

Edward White On behalf of **National Grid** Before the

U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 12, 2014

"National Grid has long supported federal legislation as a comprehensive means to reduce greenhouse gas emissions. In light of the Congressional standstill to move forward with comprehensive climate legislation, we support the EPA authority to regulate GHG emissions, and National Grid supports its overall structure to advance America's clean energy economy.

Additionally, the Company supports EPA's approach of

"... [W]e support the EPA authority to regulate GHG emissions, and National Grid supports its overall structure to advance America's clean energy economy. ...

As a national leader in the deployment of energy efficiency programs, National Grid believes strongly that energy efficiency strategies and technologies are an achievable and cost-effective means to reducing carbon emissions. incorporating energy efficiency and renewable energy into the state target setting and compliance process and believes that the agency is within its legal authority to do so. As a national leader in the deployment of

energy efficiency programs, National Grid believes strongly that energy efficiency strategies and technologies are an achievable and cost-effective means to reducing carbon emissions nationwide. Based on National Grid's experience with implementing energy efficiency programs, EPA's proposed 1.5% level for energy efficiency can be achieved especially in states that have not yet undertaken meaningful energy efficiency programs. ...



www.aspensnowmass.com/

Mission

Aspen Skiing Company operates the Aspen/Snowmass resort complex, comprising four ski areas near the town of Aspen, Colorado. It employs over 3,500 people in the winter and 900 year-round. In the past, it has lobbied in support of the Water Rights Protection Act.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-8072 Matthew Hamilton On behalf of Aspen Skiing Company Before the

U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

August 8, 2014

"Aspen Skiing Company supports adoption of EPA's Clean Power Plan because clean power is good for the economy, our health, our environment and our community's future. ...

Since 1949 we have seen an increase in the number of frostfree days, meaning there are fewer days with below freezing

temperature s needed to make snow. Without snowmakin g our season would be shortened to a degree that our viability could be threatened. Recently the United States Department

"Aspen Skiing Company supports adoption of EPA's Clean Power Plan because clean power is good for the economy, our health, our environment and our community's future. ...

We are pleased to see that EPA's proposed rule allows individual states to utilize a number of flexible strategies to comply with the proposed standard. ... The Clean Power Plan rules represent an important action that is needed now.

of Agriculture placed Aspen in the same climactic zone as Carbondale, a town 2,000 feet lower, sitting in an area of the Roaring Fork Valley which locals refer to as the banana belt. Left unabated, rising greenhouse gas emissions are predicted to transition Aspen to a climate similar to that of Amarillo, Texas by 2100. ...

We are pleased to see that EPA's proposed rule allows individual states to utilize a number of flexible strategies to comply with the proposed standard. ... The Clean Power Plan rules represent an important action that is needed now. Aspen Skiing Company understands the importance of clean power and encourages EPA to adopt this ground-breaking regulatory approach to maintain rural, tourism-based economies throughout our country."

Health Benefits of the Clean Power Plan

HERE'S HOW MODERNIZING OUR POWER PLANTS WILL MAKE OUR COMMUNITIES HEALTHIER

EPA's proposed power plant rule will set the **first-ever national carbon emissions limits** for America's existing power plants.

THE RESULT: LESS CARBON POLLUTION

In 2030, because of these standards, there will be **30% less carbon pollution** from the power sector.

(That's the equivalent of canceling out the carbon pollution from nearly two-thirds of all cars and trucks in America.)

And there will be 25% less smog and soot.

WHEN THESE POLLUTION REDUCTIONS ARE IMPLEMENTED, AMERICANS WILL:

BREATHE EASIER An estimated 3,700 fewer cases of bronchitis in children

An estimated **150,000** fewer asthma attacks in children

STAY IN SCHOOL

Kids will miss an estimated 180,000 fewer days of school

LIVE LONGER

An estimated **2,700 to 6,600** fewer premature deaths

STAY OUT OF THE HOSPITAL

Up to 3,300 fewer heart attacks

More than **1,800** avoided hospital visits for cardiovascular and respiratory illnesses

GET BACK TO WORK

An estimated **310,000** fewer lost work days

wh.gov/climate-change



www.lung.org

Mission

The American Lung Association is the leading organization working to save lives by improving lung health and preventing lung disease through education, advocacy and research. For more than 100 years, we have led the fight for healthy lungs and healthy air, whether it's searching for cures to lung diseases, keeping kids off tobacco, or fighting for laws that protect the air we all breathe.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-23044





AMERICAN PUBLIC HEALTH ASSOCIATION For science. For action. For health.





Harold P. Wimmer On behalf of the **American Lung Association et al.** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for

Existing Stationary Sources: Electric Utility Generating Units"

December 1, 2014

"Climate change poses grave threats to public health. To protect our communities and the public, the United States must significantly reduce carbon pollution from the largest source, which are existing power plants. Our organizations support

EPA's overall approach with the Clean Power Plan, but urge EPA to strengthen the final plan to provide greater protection to public health. ...

Growing evidence over the past few years has demonstrated the multiple, profound risks that imperil the lives and health of millions. Consequently, the nation has a short window to act to reduce those threats...

Based on [proposed] reductions, EPA estimated that Our organizations have long recognized that climate change poses a major threat to the health of our patients and to the public. We are pleased that the Obama Administration has begun to take ... critical steps to move the nation toward longneeded steps to reduce those threats.

implementing the Clean Power Plan could avoid 2,700 to 6,600 premature deaths in 2030. In 2030, children would suffer 140,000 to 150,000 fewer asthma attacks. People with cardiovascular disease would have 340 to 3,300 fewer heart attacks. Hospital admissions for cardiovascular and respiratory conditions would drop, with 2,700 to 2,800 fewer admissions in 2030. ...

We appreciate EPA's commitment to allow the states to have flexibility to use multiple tools and to innovate in their approaches to cut carbon emissions... Many of our organizations, particularly those with state chapters, intend to support the states adopting plans and systems that will provide the greatest reduction in carbon emissions to protect public health... Our organizations have long recognized that climate change poses a major threat to the health of our patients and to the public. We are pleased that the Obama Administration has begun to take these critical steps to move the nation toward long-needed steps to reduce those threats."



https://www.aap.org/

Mission

American Academy of Pediatrics works to attain optimal physical, mental, and social health and wellbeing for all infants, children, adolescents and young adults. AAP supports the professional needs of its 64,000 members – pediatric primary care physicians, medical sub-specialists and surgical specialists.



http://www.psna.org/

Mission

The Pennsylvania State Nurses Association protects the interests of nursing professionals and patients by educating and informing Pennsylvania's leaders with researched, reasoned information and facts.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-23426

American Academy of Pediatrics, Pennsylvania Chapter

and

Pennsylvania State Nurses Association Before the

U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 8, 2014

"As health and medical organizations in Pennsylvania, we write to urge the U.S. Environmental Protection Agency to adopt a strong, enforceable Clean Power Plan to reduce carbon pollution from existing electric power plants. We support strong measures that will provide the greatest protection for Pennsylvanians from the consequences of climate change and from all of the harmful emissions of these plants. ...

The health impacts of climate change are too often overlooked.

Reducing carbon pollution from power plants will help us fight climate change. ... As EPA has estimated, the proposed carbon pollution limits will prevent up to 150,000 asthma attacks and up to 6,600 premature deaths when fully implemented.

We call on the EPA to set strict, enforceable limits on carbon pollution from power plants and ensure that the air we breathe is healthy. ... The health of our nation demands nothing less. ... [P]eople all across America experience these effects now, ranging from increased air pollution, to heatrelated illnesses, extreme weather events ... and the spread of infectious diseases.

... Communities facing damage caused by extreme weather conditions will face special challenges, and

more and more of the nation may face those emergencies. Reducing carbon pollution from power plants will help us fight climate change. ... As EPA has estimated, the proposed carbon pollution limits will prevent up to 150,000 asthma attacks and up to 6,600 premature deaths annually when fully implemented.

To protect Pennsylvania and especially our most vulnerable communities, EPA must act decisively. We call on the EPA to set strict, enforceable limits on carbon pollution from power plants and ensure that the air we breathe is healthy. ... The health of our nation demands nothing less."



Mission

The ALA is the leading organization working to save lives by improving lung health and preventing lung disease through research, education and advocacy.

The ALA of MI submits these comments on behalf of the following organizations:



For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-35729 Ken Fletcher On behalf of the **American Lung Association of Michigan et al.** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

August 7, 2015

"The undersigned Michigan health and medical organizations call on the U.S. Environmental Protection Agency to protect public health by implementing, and enforcing strong limits on carbon pollution. ...

[The] impacts of climate change are already contributing to asthma attacks and other respiratory problems, cases of heat stroke, and premature deaths. The U.S. Environmental Protection Agency's proposed Clean Power Plan will help the nation take important steps toward protecting Americans' health from these threats.

The Clean Power Plan gives Michigan flexibility to reduce the

carbon pollution that causes climate change, and taking these crucial steps to reduce carbon pollution would also lower other deadly power plant pollutants at the same time, preventing asthma attacks, emergency room visits, hospitalizations, and premature deaths. This is a win-win for the health of Michigan residents.

Our organizations call upon EPA to implement, and enforce the Clean Power Plan to protect public health. [The] impacts of climate change are already contributing to asthma attacks and other respiratory problems, cases of heat stroke, and premature deaths. The U.S. Environmental Protection Agency's proposed Clean Power Plan will help the nation take important steps toward protecting Americans' health from these threats.

Our organizations call upon EPA to implement, and enforce the Clean Power Plan to protect public health.

Our communities, including Michigan's 214,610 children and 798,636 adults with asthma, deserve healthy air to breathe."



http://www.azasthma.org/

Mission

The Arizona Asthma Coalition is a non-profit partnership of state and local public health departments, environmental departments, the American Lung Association of Arizona, medical professionals, and educators, among others. They serve to develop strategies, policies and an advocacy agenda for those afflicted with asthma.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-24249 Barbara Burkholder On behalf of the **Arizona Asthma Coalition** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 12, 2014

"The Arizona Asthma Coalition supports the proposed EPA Clean Power Plan to reduce emissions of carbon dioxide from electric utilities, both for the nation and for Arizona. ...

Health impacts of projected changes in global climate are also expected to be especially severe among susceptible

EPA estimates that for every dollar invested to reduce carbon emission under the proposed rule, the U.S. will benefit from an estimated seven dollars in health benefits.

...EPA estimates that the proposed rule will prevent up to 150,000 asthma attacks and 6,000 premature deaths annually, once fully implemented by 2030. ...

The Arizona Asthma Coalition strongly supports this cost-effective compliance strategy.

subpopulations, especially children, the elderly, those with chronic diseases, and people who live in impoverished communities, especially the urban poor.

EPA estimates that for every dollar invested to reduce carbon emissions under the proposed

rule, the U.S. will benefit from an estimated seven dollars in health benefits. ... As air quality improves over the next 15 years, EPA estimates that the proposed rule will prevent up to 150,000 asthma attacks and 6,000 premature deaths annually, once fully implemented by 2030. ...

The Arizona Asthma Coalition strongly supports this costeffective compliance strategy. Arizona is the ideal state for widespread expansion of solar generation. ... The National Renewable Energy Lab reported that between 2008 and 2013, installed solar photovoltaic capacity increased over 15 times in the U.S., and prices for PV modules fell 80%. This strategy can achieve cost-effective compliance, drive job creation and keep Arizonans' hard-earned dollars in the local economy."

Environmental Benefits of the Clean Power Plan



http://www2.epa.gov/cleanpowerplan/clean-power-plan-protects-our-environment-health-economy



http://www.sierraclub.org/

Mission

The Sierra Club is the nation's largest and most influential grassroots environmental organization. Its efforts have impacted wilderness conservation, clean air and water, and clean energy, among others.



http://earthjustice.org/

Mission

Earthjustice is the largest nonprofit environmental law organization. It seeks to leverage its expertise to hold accountable those who break environmental laws.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-24029 Joanne Spalding On behalf of **Sierra Club** and **Earthjustice** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 1, 2014

"Global climate change is the biggest environmental, social, and political challenge of our time. Unless we act swiftly and immediately to curb emissions of heat-trapping pollutants, especially carbon dioxide, we will be unable to mitigate the worst effects of this crisis: rising sea levels, ... an increasing scarcity of crucial natural resources, a greater frequency of extreme weather events, ... widespread displacement of peoples, and unprecedented social upheaval. Fossil fuel-fired power plants, or electric generating units, are the single largest source of CO_2 emissions in the United States ...

Fossil fuel-fired power plants, or electric generating units, are the single largest source of CO_2 emissions in the United States ...

We applaud the EPA for proposing the Clean Power Plan, which represents the first direct limitations on CO_2 emissions from the U.S. electric sector. We applaud the EPA for proposing the Clean Power Plan, which represents the first direct limitations on CO_2 emissions from the U.S. electric sector. The CPP comes at a critical moment in the fight against climate change. ... For the U.S. to be a climate leader on the world stage and meet its international commitments, the CPP

and similar efforts are crucial. ... The CPP both reflects the changing nature of the utility sector and helps advance the momentum toward cleaner generation that already exists.

The combination of four building blocks that constitute EPA's proposal – heat rate improvements at coal-fired EDUs, reduced utilization of coal plants in favor of lower-emitting sources, increased development and use of non-emitting resources, and energy efficiency investments – is cost-effective, technically achievable, and well-tailored to reflect the complex and interconnected nature of the electric system. As such, EPA's plan is an appropriate exercise of the agency's authority under section 111(d) of the Clean Air Act."



www.nwf.org

Mission

The National Wildlife Foundation is a nationwide federation of state and territorial affiliate organizations dedicated to conserving wildlife and wild places. Through various volunteer programs and affiliate collaborations, they dedicate themselves to connecting people to nature, reversing global warning, and protecting and restoring critical wildlife habitats.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-22998 Jim Murphy On behalf of the **National Wildlife Federation** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 1, 2014

"We applaud EPA's efforts to reduce carbon pollution from existing [utilities] and believe this effort presents a landmark opportunity to speed the transition from climate-disrupting fossil fuels to a responsible, clean energy power sector that will help avert the catastrophic impacts runaway climate change will have on wildlife, habitat, and the special places outdoor enthusiasts treasure. We have an obligation to protect wildlife and our children's future from the dire threat of climate change. ...

Across the United States and around the world, climate change

poses a dire threat to wildlife, communities, and public health. For example, the National Climatic Data Center reports that the United States experienced nine climate or weather disasters that each caused more than a billion dollars of damage in 2013, which included devastating floods, an extreme drought and severe storms that killed 113 people and caused impacted areas serious economic harm.

... A final rule that

Across the United States and around the world, climate change poses a dire threat to wildlife, communities, and public health. ...

... A final [Clean Power Plan] rule that reduces carbon pollution in a manner that spurs the transition to cleaner, less polluting energy sources presents an unprecedented opportunity to avert the impacts of climate change while also reducing other forms of pollution that harm wildlife and people.

reduces carbon pollution in a manner that spurs the transition to cleaner, less polluting energy sources presents an unprecedented opportunity to avert the impacts of climate change while also reducing other forms of pollution that harm wildlife and people. Wind, solar, and sustainable biomass present affordable, responsible clean energy opportunities we must invest in for the future of wildlife."



http://lulac.org/

Mission

The mission of the League of United Latin American Citizens is to advance the economic condition, educational attainment, political influence, housing, health and civil rights of the Hispanic population of the United States through service programs and advocacy in 35 states, the District of Columbia, and Puerto Rico.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-35499

Roger C. Rocha On behalf of the **League of United Latin American Citizens** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for

Existing Stationary Sources: Electric Utility Generating Units"

August 27, 2015

"WHEREAS, Surveys of the peer-reviewed scientific literature and the opinions of experts consistently show a 97-97% consensus that humans are causing climate change; and

WHEREAS, Carbon pollution fuels climate change, the effects of which we are already experiencing by way of worsened air quality and more intense natural disasters. ...

WHEREAS, Latinos are over represented in certain types of occupations, such as agriculture, construction and landscaping, putting them at increased risk of exposure to dirty air ...

WHEREAS, According to NRDC's ... survey, 9 out of 10 Latinos, the nation's largest minority group at 50 million strong, want the federal government to take action on carbon emissions and the threat of climate change; and ... We have a moral obligation to protect our children and future generations form the impacts of climate change and we can do so by setting the first-ever federal limits on carbon pollution from power plants;

THEREFORE IT BE RESOLVED, LULAC supports the U.S. EPA Clean Power Plan."

WHEREAS,

According to NRDC's ... survey, 9 out of 10 Latinos, the nation's largest minority group at 50 million strong, want the federal government to take action on carbon emissions and the threat of climate change; and ...

WHEREAS, We have a moral obligation

to protect our children and future generations form the impacts of climate change and we can do so by setting the first-ever federal limits on carbon pollution from power plants;

THEREFORE IT BE RESOLVED, LULAC supports the U.S. EPA Clean Power Plan."



http://all4energy.org/

Mission

Founded in 1985, the Alliance for Affordable Energy promotes fair, affordable, environmentally responsible energy. With its three programs – Clean Energy, Consumer Protection and Education, and Energy Efficiency – they connect technical policy work and community organizing.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-22928 Casey DeMoss On behalf of **Alliance for Affordable Energy** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 6, 2014

"The Alliance asserts that the Clean Power Plan will greatly benefit Louisiana by creating new jobs, new sources of revenue, increasing demand for natural gas, decreasing air pollution, improving public health, and most importantly, safeguarding our coastal communities by limiting the pollution that causes sea level rise and stronger storms.

Louisiana, particularly the coastal wetlands, is highly vulnerable to the impacts of climate change yet we cannot rely

on our state leaders to act rationally. Our coast is eroding at an astonishing rate and ... according to our sate scientists, we can only build wetlands if sea levels stay at a manageable increase of 1.5 feet. In spite of this hard fact, our State Senators, Governor, and Secretary of the Department of Environmental Quality are

Louisiana, particularly the coastal wetlands, is highly vulnerable to the impacts of climate change yet we cannot rely on our state leaders to act rationally. [O]ur State Senators, Governor, and Secretary of the Department of Environmental Quality are prepared to fight carbon emission reductions. We call this cognitive dissonance. ...

We are working to increase reason along with renewables and energy efficiency within our state while maintaining affordable energy costs to our citizens.

prepared to fight carbon emission reductions. We call this cognitive dissonance. ...

We are working to increase reason along with renewables and energy efficiency within our state while maintaining affordable energy costs to our citizens. We have urged our PSC to recognize that Louisiana has many options available to comply with the Clean Power Plan reduction goals."



www.edf.org

Mission

The Environmental Defense Fund's mission is to preserve the natural systems on which all life depends. Focusing on climate, oceans, ecosystems and health, they work with other organizations, businesses, government, and communities to propose multidisciplinary solutions that make a lasting difference.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-23140

Megan Ceronsky On behalf of the **Environmental Defense Fund** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for

Existing Stationary Sources: Electric Utility Generating Units"

December 6, 2014

"We urge EPA to finalize these historic and urgently needed carbon pollution standards.... It is imperative that we dramatically reduce carbon pollution. The science is clear: rising concentrations of heat-trapping gases like carbon dioxide in the atmosphere will destabilize our climate and lead to severe impacts on our health and well-being....

We are already seeing the impacts of climate change on our communities and facing substantial costs from these impacts. But the costs that our children and grandchildren will face if we fail to act now are simply unacceptable.

We must act now to reduce carbon pollution and mitigate these

We urge EPA to finalize these historic and urgently needed carbon pollution standards.... It is imperative that we dramatically reduce carbon pollution. The science is clear: rising concentrations of heat-trapping gases like carbon dioxide in the atmosphere will destabilize our climate and lead to severe impacts on our health and well-being and risk triggering catastrophic climate change.

We must act now to reduce carbon pollution and mitigate these impacts.

impacts. Fossil fuel-fired power plants are the largest source of greenhouse gases in our nation, and the solutions are at hand to reduce carbon pollution from the power sector. Reducing carbon pollution will also result in important

reductions in health-harming co-pollutants such as mercury, nitrogen oxides, sulfur dioxide, and particulates. Reducing these co-pollutants will reduce asthma attacks, heart attacks, hospital admissions, missed school and work days, and premature deaths.



www.ccap.org

Mission

The Center for Clean Air Policy is the only independent, nonprofit think tank working exclusively on climate and air quality policy at the local, national, and international levels. It seems to advance costeffective and pragmatic air quality and climate policy through analysis, dialogue and education.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-22579 Ned Helme On behalf of the **Center for Clean Air Policy** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 3, 2014

"The Center for Clean Air Policy supports the Administration's proposal to regulate greenhouse gas emissions from electric generating units under the Clean Air Act. The proposed approach of assigning emissions reduction opportunities from four well-understood technology building blocks on the basis of state-specific characteristics is fair and reasonable. This approach acknowledges the uneven distribution of mitigation opportunities across the country and offers recognition to states that have acted early to deploy low carbon solutions. Moreover, the approach shows how the standards can be met in each state using demonstrated technologies. ...

In reducing emissions from existing power plants by an estimated 30 percent below 2005 levels by 2030, the proposed rule achieves meaningful emissions reductions. While the

science demands even more ambitious mitigation over time to stay on a path to a global 2 degree Celsius goal, this rule offers an important down payment. The

The Center for Clean Air Policy supports the Administration's proposal to regulate greenhouse gas emissions from electric generating units under the Clean Air Act.

The proposal has demonstrated to the international community the U.S. is serious about making emissions reductions, and it has improved our standing in the international negotiations.

proposal has demonstrated to the international community the U.S. is serious about making emissions reductions, and it has improved our standing in the international negotiations. The action is important in buttressing the United States' intended nationally determined contribution, showing a viable path to achieving an aggressive interim goal of 26-28 percent below 2005 levels by 2025."



http://www.cpuc.ca.gov/puc/

Mission

The California Public **Utilities Commission** regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies. It serves the public interest by protecting consumers and ensuring the provision of safe, reliable utility service and infrastructure at reasonable rates, with a commitment to environmental enhancement and a healthy California economy.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-31935

Mark J. Ferron On behalf of the **California Public Utilities Commission** Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

January 7, 2015

"We are at an inflection point where the convergence of new technologies, changing economics and, I hope, an added urgency to address our deteriorating climate, will combine to create exciting new business and policy opportunities. The EPA's rules for existing power plants are a critical piece of creating those opportunities ...

... Coastal flooding and extreme weather mean billions of dollars of coastal property will literally be underwater and taxpayers could bear much of the costs of recoveries...

The costs of climate change are also borne in the significant

A significant reduction in carbon pollution by U.S. power plants can have a significant impact on the future global carbon emissions. ... Cutting this pollution is key to avoiding catastrophic climate change and lowering the health and economic impacts of climate change. The draft Clean Power Plan is a major step forward." health impacts that have only gotten clearer since the Endangerment Finding. ... By 2050, Americans could see triple the number of days over 95°F that we see today... [putting] the young, elderly, sick, and poor especially at risk...

Power plants accounted for 32% of the United States carbon pollution in 2012, and power plants in the United

States account for 6.3% global carbon pollution. A significant reduction in carbon pollution by U.S. power plants can have a significant impact on the future global carbon emissions. ... Cutting this pollution is key to avoiding catastrophic climate change and lowering the health and economic impacts of climate change. The draft Clean Power Plan is a major step forward."



www.seedcoalition.org/

Mission

The Sustainable Energy and Economic Development (SEED) Coalition works for clean air and clean energy. We support affordable energy efficiency and renewable energy solutions to meet our energy needs.

For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-24257

Karen Hadden On behalf of the Sustainable Energy and Economic Development Coalition Before the U.S. Environmental Protection Agency

"Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 12, 2014

"Since the electricity sector is the single largest source of greenhouse gas emissions in the U.S., the Clean Power Plan is a vital federal initiative for reducing carbon emissions in the United States. The EPA's approach of setting carbon emission targets for individual states provides the benefits of setting enforceable carbon emission reduction targets for each state and providing states with guidance for developing the most useful, cost-effective, and forward-looking plans for compliance with the targets. ...

The Clean Power Plan proposes a target of 30% reduction below 2005 carbon emission levels by 2030. The Intergovernmental Panel on Climate Change has said that

carbon emissions should be reduced globally by 41% to 72% from 2010 levels in order to limit global average temperature rise to 2 degrees Celsius. Research by the Institute for Energy and Environmental Research has found that 'it is feasible and cost-effective to reduce carbon

[T]he Clean Power Plan [CPP] is a vital federal initiative for reducing carbon emissions in the United States.

The financial cost of inaction is staggering....

We urge EPA to continue down the path created by the CPP, but to strengthen the goals [and] shorten the timeline for action."

emissions from EGUs by 55% below 2005 levels by 2030.

The financial cost of inaction is staggering as well. Locally, a historic flash flood in Oct. 2013 in Austin, Texas resulted in \$30 million in losses, according to FEMA. 548 homes and businesses were lost. There were dozens of rescues and 4 people were killed. ... Travis County's uninsured claims cost \$28 million. ... We urge EPA to continue down the path created by the CPP, but to strengthen the goals [and] shorten the timeline for action."



http://www.arb.ca.gov/

Mission

The California Air Resources Board is a part of the California EPA. Its mission is to promote and protect public health, welfare and ecological resources through the effective and efficient reduction of air pollutants while recognizing and considering the effects on the economy of the state.

Twenty two representatives from 14 states representing various state agencies also signed the joint statement to the EPA, including representatives from:



For full statement, see here: http://www.regulations.gov/ #!documentDetail;D=EPA-HQ-OAR-2013-0602-23597

Mary D. Nichols, **California Air Resources Board** On behalf of 22 undersigned representatives from 14 states Before the U.S. Environmental Protection Agency "Proposed Rule: Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units"

December 10, 2014

"We are a group of state environmental agency leaders, energy agency leaders, and public utility commissioners from 14 states. ... We applaud EPA for proposing a rule that will place the United States on a path to achieving meaningful reductions

We applaud EPA for proposing a rule that will place the United States on a path to achieving meaningful reductions in carbon pollution ... Our states are already demonstrating that significant, cost-effective reductions can be achieved from the power sector through the 'system' EPA identifies as the basis for its proposed emission guideline. ... in carbon pollution ... Our states are already demonstrating that significant, cost-effective reductions can be achieved from the power sector through the 'system' EPA identifies as the basis for its proposed

emission guideline. ...

EPA projects that in 2030 reducing particulate matter and ozone pollution will have the effect of avoiding up to 150,000 asthma attacks, 3,300 heart attacks, 6,600 premature deaths, and 490,000 days of missed school for children or missed work for adults....

... The National Climate Assessment indicates that the average U.S. temperature has increased by 1.3 to 1.9 degrees Fahrenheit since 1895, and the period from 2001 to 2012 was the warmest decade on record. ... Our individual states are already experiencing these impacts, and incurring substantial economic costs ...

"[Hurricane Sandy] ... caused widespread devastation, including [multiple deaths]. Damage from Hurricane Sandy to New York City alone was estimated at \$19 billion, and statewide Sandy cost New York \$32.8 billion in repair and restoration costs and \$9.1 billion in mitigation and prevention costs. The estimated cost to Connecticut for the 2011-12 storms exceeded \$750 million dollars."