

**Community Comments on EPA's
Advance Notice of Proposed Rulemaking:
State Guidelines for Greenhouse
Gas Emissions from Existing Electric
Utility Generating Units**

Docket No. EPA-HQ-OAR-2017-0545

*Submitted via regulations.gov
February 26, 2018*

The undersigned organizations oppose EPA Administrator Scott Pruitt's ongoing campaign to repeal the Clean Power Plan and leave Americans without any meaningful nation-wide limits on carbon pollution from power plants. Repealing the Clean Power Plan and replacing it with weak limits on power plant carbon pollution—or nothing at all—is a reckless course of action that places the health and safety of millions of Americans at greater risk from climate change and higher levels of deadly air pollution.

America's power plants are our nation's largest stationary source of the carbon pollution that is changing our climate and posing a dire threat to public health and welfare in the United States and worldwide. Communities and families across the country are already facing the devastating impacts of climate change in the form of more intense hurricanes, rising sea levels, heat waves, wildfires and other extreme weather events. We need to take urgent action to dramatically reduce the pollution that is destabilizing our climate, and it is essential to curb this pollution from the power sector. Deep emission reductions from the nation's fossil fuel power plants are readily attainable, as shown by the clean energy and energy efficiency progress that is already underway and spurring innovation and job creation across the country.

Despite the urgent need for action, Administrator Pruitt has proposed an outright repeal of the Clean Power Plan, one of America's most important steps to address climate change and the only nation-wide limit on power plant carbon pollution. Meanwhile, the Administrator has initiated this Advance Notice of Proposed Rulemaking (ANPR) proceeding to consider whether to issue a replacement for the Clean Power Plan at all. We strongly oppose the Administrator's consideration of any option that would leave Americans without any federal protection from this enormous source of harmful pollution, in dereliction of his duty under our nation's clean air laws to address this danger.

Moreover, we oppose any "replacement" for the Clean Power Plan that fails to achieve the significant reductions in carbon pollution that are readily achievable from this sector. The ANPR makes plain that EPA has no intention of replacing the Clean Power Plan with effective standards to reduce carbon pollution from power plants. The ANPR is premised on the deeply flawed legal theory underlying EPA's proposed repeal of the Clean Power Plan, and seeks public comment on a narrow set of possible policy options deliberately selected to produce trivial reductions in power plant carbon pollution—and that ignore the extensive information and analysis EPA has already collected through the Clean Power Plan rulemaking process and the exhaustive public outreach that contributed to the Plan's development.

Administrator Pruitt is abandoning his Clean Air Act duty to protect the public from harmful carbon pollution. The Administrator's failure to comply with his legal obligation to protect public health and the environment from the urgent hazards of climate change is unlawful. EPA should withdraw the ANPR and the Repeal Proposal, and should refocus its efforts on strengthening and implementing the Clean Power Plan.

Sincerely,

Bold Alliance

Center For Sustainable Communities

Earthjustice

Elders Climate Action

Environmental Defense Fund

Grand Canyon Trust

Greater Minnesota Housing Fund

GreenLatinos

ICAST (International Center for Appropriate and Sustainable Technology)

Interfaith Power & Light

Kentucky Conservation Committee

League of Women Voters of the United States

Montana Environmental Information Center

National Housing Trust

Natural Resources Defense Council

Power Shift Network

Sierra Club

Southern Alliance for Clean Energy

Southern Environmental Law Center

Tohn Environmental Strategies

Voices for Progress

Vote Solar

WE ACT for Environmental Justice