

Opportunity to comment on Clean Power Plan Rollback

The Trump Administration's plan to roll back the Clean Power Plan, America's most robust federal greenhouse gas (GHG) policy, will begin moving ahead this year. The proposed rollback will greatly weaken the requirements to curb GHG emissions, taking our nation in the wrong direction on a critically important issue. There is still time, but not much, to submit comments on behalf of your League opposing the weakening of this pivotal US climate policy. All concerned Leagues and members are urged to do so. Below is information on how to file comments, and some message points you may wish to consider.

Public comment is being received through EPA's website until 11:59 Eastern on January 16th. Go to this link to upload and submit your comments <https://www.regulations.gov/comment?D=EPA-HQ-OAR-2017-0355-0002>. The pertinent docket is 'Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units.'

Background

You may recall that LWVUS has issued the following statement opposing the rollback of the Clean Power Plan.

"By repealing the Clean Power Plan, the White House is putting the interests of corporate polluters ahead of the health and safety of the American public. This decision will have a devastating impact on the planet at a time when we are seeing the powerful climate change effects with rising temperatures, deadly hurricanes and destructive wildfires. The League is appalled at this irresponsible decision that will have a long-term devastating impact on our planet and health of the American people."

Some additional background points you may find helpful are below.

- The EPA is legally required to regulate carbon, a finding upheld by the Supreme Court in 2011. Simply repealing the Clean Power Plan without replacing it with other carbon regulations would have been subject to legal challenge. Instead the Trump/Pruitt EPA has cynically devised a weak approach to carbon regulation in an attempt to satisfy its legal obligations without achieving meaningful greenhouse gas reductions.
- This proposed action would replace the flexible and effective approach proposed under the Obama administration with an inflexible 'inside the fenceline' approach which will cost more and have less impact. 'Inside the fenceline' measures – those which can be installed at existing power plant facilities – take renewable and energy efficiency options off the table. These are the least expensive options for reducing greenhouse gas emissions and should be maximized, not prohibited as options under federal policy.
- The 'inside the fenceline' approach will harm Americans more than simply not implementing the 2015 Clean Power Plan. Analysis by Harvard and Syracuse Universities finds that the proposed 'inside the fenceline' approach will make air quality worse and endanger more lives than doing nothing at all. The Pruitt proposal would actively sacrifice public health and wellbeing and create new air pollution hotspots around the nation.
- Implementing the 2015 version of the Clean Power Plan would have avoided 3600 premature deaths and 90,000 pediatric asthma attacks *each year* according to 17 national health and

medical organizations. Just doing nothing on CPP would have cost Americans this many health problems; the Pruitt policy now proposes a path that will further increase the public harm.

- The policy's intent of propping up the fossil fuel industries is at odds with job creation as well. Currently, the clean energy sector provides five times as many jobs as the fossil fuel industries. Slowing this growing sector of the economy fails Americans economically as well as environmentally.
- And this policy change will also slow our nation's progress on solving the climate change problem, gutting a plan designed to reduce carbon emissions 32% by 2030 and replacing it with a proposal that could never accomplish similar results.

Possible points for your comments to EPA

Message points that may be useful:

- EPA has a responsibility under the law to regulate carbon, having determined that carbon endangers the health of the American public. This legal obligation has been affirmed by the Supreme Court.
- The current proposal takes steps to weaken EPA's regulation of carbon, an abdication of this legal responsibility to the citizens of the US.
- The proposed 'inside the fenceline' approach is inadequate and costly. It will limit potential emissions reductions and increase the costs of every ton of avoided carbon. We desire a policy that does more, not less, to reduce carbon pollution and that makes it more feasible, not less, to do so at a reasonable cost.
- Weakening federal carbon regulation will cost thousands of Americans their health. This approach also raises the costs borne by American citizens by excluding lower cost energy efficiency and renewables options.
- The flexible approach proposed under the 2015 Clean Power Plan is superior for reducing carbon emissions and containing costs. EPA could better meet its legal obligations to regulate carbon by implementing the Clean Power Plan as promulgated in 2015.
- We support the implementation of the 2015 Clean Power Plan and its robust use of clean energy options, not inadequate measures installed at existing power plants as now proposed. Walking back our nation's carbon policies fails current and future citizens of the US, harming public health, communities, and the environment, and slowing economic growth – a lose-lose-lose outcome for America.