



National Association of County & City Health Officials

The National Connection for Local Public Health

December 1, 2014

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Air and Radiation Docket and Information Center
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OAR-2013-0602

Dear Administrator McCarthy:

On behalf of the **National Association of County and City Health Officials** and local health departments that work every day to ensure the safety of the water we drink, the food we eat, and the air we breathe, I write in support of the Carbon Pollution Emission Guidelines for Existing Stationary Sources, or Clean Power Plan, proposed by the Environmental Protection Agency (EPA). These regulations must be finalized without delay for EPA to take an important step toward ensuring that electricity is produced by the most modern, and least toxic, power plants.

Existing power plants are the largest source of carbon pollution in the United States. Reducing carbon pollution from power plants will help us fight climate change. The nation's 2,800 local health departments work closely with other government agencies, local businesses, and community partners to address the impacts that a changing climate has on health and to develop and implement solutions that keep people healthy and safe. However, federal efforts are needed in addition to local actions to address the challenge posed by climate change. The Clean Power Plan will provide the greatest protection for our communities from the impacts of climate change and from all of the harmful emissions of these plants.

The health impacts of climate change are too often overlooked. As highlighted in the recent National Climate Assessment, people all across America experience these effects now, ranging from increased air pollution, to heat-related illnesses, extreme weather events, such as drought and dust storms, excessive rain and flooding, and the spread of infectious diseases.

These impacts to public health require an ongoing response from public health departments. As budgets have shrunk over the past few years, public health challenges, including those related to climate change, have increased. Communities confronting damage caused by extreme weather conditions face special challenges, and more and more of the nation may face those emergencies.



Cutting carbon pollution will also cut direct emissions of dangerous pollutants, including sulfur dioxide, nitrogen oxides, fine particulate matter and mercury, and will reduce ozone and particulate matter pollution. Reducing these pollutants will prevent thousands of premature deaths, asthma attacks, heart attacks, hospital admissions and emergency department visits. As EPA has documented, every \$1 invested in cleaning up power plants will provide up to \$7 in health and economic benefits.

The final regulations must provide the strongest possible carbon pollution standards to protect communities from the damaging health effects of pollution from power plants. In order to strengthen the Clean Power Plan and further protect the public's health, I offer the suggestions below:

EPA should set more aggressive compliance dates without reducing targets. States understandably need time to phase in some measures. However, the EPA proposal offers an excessively long period for phase in compared to other similar major rules. NACCHO urges EPA to shorten the time for putting these measures in place, but *without* reducing the required reductions. The President announced November 11 a commitment to reduce the nation's net greenhouse gas emissions up to 28 percent below 2005 levels by 2025. To accomplish that goal, this plan must require more reductions from the existing electric sector. EPA should revise the compliance schedule to ensure states start reducing emissions as soon as possible, and move the completion date to no later than 2025 without reducing the targets.

The targets need to recognize that states can and should do more to reduce carbon emissions. EPA based the reductions on the agency's calculations of what each state could do. However, some states report that they are already doing more in some categories than EPA has proposed as a target. EPA needs to set standards that encourage states to do more even if they are already meeting targets.

NACCHO and local health departments urge EPA to finalize regulations for existing power plants as quickly as possible in order to address threats to the public's health. Thank you for the opportunity to comment on the proposed regulation to regulate existing power plants.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. Pestronk". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert M. Pestronk, MPH
Executive Director