



WASHINGTON BUREAU · NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE  
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January 30, 2014

Ms. Drusilla Hufford  
Director Stratospheric Protection Division  
Office of Atmospheric Programs  
U.S. Environmental Protection Agency  
Mail Code 6201  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

**RE: PROTECTION OF STRATOSPHERIC OZONE: ADJUSTMENTS TO THE ALLOWANCE  
SYSTEM FOR CONTROLLING THE PRODUCTION, IMPORT & EXPORT OF  
HYDROCHLOROFLUOROCARBONS (HCFCs)**

Dear Ms. Hufford:

Climate change has a disproportionate impact on communities of color in the United States and around the world. The NAACP Environmental and Climate Justice Program was created to mobilize and educate communities to advocate for and address these human and civil rights issues.

The United States operates under the Clean Air Act (CAA) and the Montreal Protocol. Both the Law and the Treaty have the purpose and intent to address chemicals that when not contained, cause harm to the environment and the citizens of this country and the world.

We have become aware of a rule that was promulgated on April 3, 2013, which allowed for the production consumption and possible venting of a chemical known as chlorodifluoromethane, HCFC-22, R-22 a hydrochlorofluorocarbon (HCFC). A "Petition for Reconsideration" was filed with the EPA on June 3, 2013 in an attempt to correct that rule and lessen the impact that this chemical could have on the communities of color.

The NAACP supports any effort to eliminate chemicals that can have a dangerous or damaging effect on our communities, to that end we support the relief the Petitioner seeks.

It is clear that when this rule was drafted the conversation was focused on ozone-depleting chemicals. The global dialogue has shifted to the reduction of products and processes that contribute to global warming potential and affect climate change. These substances have OD factors as well as contribute to global warming and climate change.

Currently EPA has announced another round of rule making for the control period of 2015 to 2019. The NAACP is committed to Climate Justice and requests EPA's compliance with Executive Order 12898 *"Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."* As such, we hope to be included (along with other organizations which represent the interests of racial and ethnic minorities in the United States), during the drafting of this new rule. Additionally, we are requesting notification regarding the status and any future meetings pertaining to the "Petition for Reconsideration," filed on June 3, 2013.

Thank you for addressing the concerns of the NAACP; I look forward to working with you on this and many other issues. Please feel free to contact me with any questions or concerns you may have by phone at (202) 463-2940 or e-mail at [hoshelton@naacpnet.org](mailto:hoshelton@naacpnet.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Hilary O. Shelton', written in a cursive style.

Hilary O. Shelton  
Director, NAACP Washington Bureau &  
Senior Vice President for Policy and Advocacy