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February 20, 2018

By electronic mail ([a-and-r-Docket@epa.gov](mailto:a-and-r-Docket@epa.gov)) and first class mail

Administrator Scott Pruitt  
Environmental Protection Agency  
EPA Docket Center (EPA/DC)  
Mail Code 28221T  
Attention Docket ID No. EPA-HQ-OAR-2017-0355  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Administrator Pruitt:

As mayors from 233 U.S. cities, we submit this letter of comment to oppose the Environmental Protection Agency's proposed repeal of the Clean Power Plan, *Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units*.<sup>1</sup>

Collectively, we represent over 51 million residents, in 46 states & territories across the country. We strongly oppose the proposed repeal of the Clean Power Plan, which would put our citizens at risk and harm our efforts to address the urgent threat of climate change.

### **Climate Change is Global but Impacts are Felt Locally**

Communities across the country are experiencing the effects of climate change today: sea level rise; hotter, longer, and more frequent heat waves; increased extreme weather; and many other harmful impacts. There is broad agreement that the future economic costs of climate change should not be overlooked. On our current path, the annual cost of coastal storm damage is expected to climb to as high as \$35 billion by the 2030s; coastal property valued at \$66 to \$106 billion will likely be underwater by 2050.<sup>2</sup>

No one is insulated from the impacts of climate change – people in cities of all sizes, along with suburban and rural communities are all at risk. Residents of our communities have experienced harmful impacts of climate change such as dirtier air, increased heat-related illnesses and deaths, damaged and disappearing coastlines, longer droughts and other strains on water quantity and quality, and increasingly frequent and severe storms and wildfires.

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<sup>1</sup> 82 Fed. Reg. 48,035 (Oct. 16, 2017), EPA-HQ-OAR-2017-0355.

<sup>2</sup> Kate Gordon et al., *Risky Business: The Economic Risks of Climate Change in the United States* 3-4 (2014), [http://riskybusiness.org/site/assets/uploads/2015/09/RiskyBusiness\\_Report\\_WEB\\_09\\_08\\_14.pdf](http://riskybusiness.org/site/assets/uploads/2015/09/RiskyBusiness_Report_WEB_09_08_14.pdf).

Reducing greenhouse gas emissions is essential to protect our citizens against the worst impacts of climate change. A peer reviewed study conducted by EPA projected stark differences between a world in the year 2100 where global warming averages 2 degrees Celsius—a goal for which the Clean Power Plan is critical—and one in which global warming averages 4 degrees Celsius: 57,000 fewer domestic deaths per year due to poor air quality; 12,000 fewer domestic deaths per year from extreme heat and cold in 49 U.S. cities; up to \$6.4 billion in avoided annual adaptation costs from severe precipitation in 50 U.S. cities; \$3.1 billion in avoided annual damages and adaptation costs from sea level rise and storm surge on the coasts; and up to \$2.5 billion in avoided damages from inland flooding.<sup>3</sup>

### **Repealing the Clean Power Plan Would Slow Local Efforts to Address Climate Change**

Not only are climate change impacts felt locally — our communities are also where climate change adaptation and mitigation efforts are being implemented. Urban, suburban, and rural communities across the country are reducing their contributions to greenhouse gas emissions by investing in energy efficiency, committing to the use of clean energy resources, and reducing reliance on fossil-fueled energy sources—efforts that protect against climate change, and also support clean air and a vibrant clean energy economy.

But the legal authority of cities and other municipalities generally extends only as far as their state governments and federal law allow, and as a result, our local efforts to address climate change are highly sensitive to national policies like the Clean Power Plan, which shape markets, steer state action, and have large direct impacts on nationwide emissions.

We would benefit from the support and certainty that a federal framework for reducing the power sector’s greenhouse gas emissions could provide. The Clean Power Plan, by providing such a framework, would enhance ongoing local efforts and enable new local initiatives to improve public health, increase air quality, and reduce greenhouse gas emissions through energy innovation.

We would like to reiterate a statement that more than 25 mayors delivered during the course of the Clean Power Plan development: “[W]e cannot act alone. We need the federal government to provide a path forward to making meaningful reductions in carbon pollution while preparing for the impacts of climate change.”<sup>4</sup>

As 233 mayors of communities across the U.S., representing over 51 million residents in 46 states & territories we strongly oppose the repeal of the Clean Power Plan, which would put our citizens at risk and undermine our efforts to prepare for and protect against the worst impacts of climate change.

Sincerely,

Mayor Peggy McQuaid  
Albany, CA

Mayor Kathy Sheehan  
Albany, NY

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<sup>3</sup> U.S. Environmental Protection Agency, Climate Change in the United States: Benefits of Global Action (2015), <https://www.epa.gov/cira>.

<sup>4</sup> Mayors National Climate Action Agenda, 27 Mayors’ Letter to President Obama, June 18, 2015, <http://climatemayors.org/actions/letters-and-%20statements/#letter-to- the-president- june- 2015>.

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