

May 9, 2012
Honorable Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
Mail Code: 6102T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: *Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility Generating Units*

Dear Administrator Jackson:

We, the undersigned state environmental leaders, write to applaud the U.S. Environmental Protection Agency's (USEPA) recently proposed New Source Performance Standard (NSPS) to limit carbon pollution from new electric generating plants. While power plants are the nation's largest sources of carbon pollution, putting 2.3 billion tons of carbon dioxide into the air each year, there are no national standards limiting this pollution. Many of our states have taken action to reduce carbon emissions from this sector, however there is a clear need for federal leadership and action. We believe that the proposed NSPS represents a critical first step.

Scientists, healthcare professionals, and other experts agree that carbon pollution endangers public health. More than 85 health organizations, including the American Academy of Pediatrics, American Lung Association, American Medical Association, American Nurses Association, American Public Health Association, and American Thoracic Society, are on record stating that:

Climate change is a serious public health issue. As temperatures rise, more Americans will be exposed to conditions that can result in illness and death due to respiratory illness, heat- and weather-related stress and disease carried by insects. These health issues are likely to have the greatest impact on our most vulnerable communities, including children, older adults, those with serious health conditions and the most economically disadvantaged.¹

Carbon pollution and global warming facilitate the formation of smog that triggers asthma attacks and permanently damages and reduces lung function. In addition to these direct health impacts, climate change will lead to ever stronger and more frequent storms, floods, and other extreme weather events. Our states have suffered billions of dollars of damage, untold disruptions, and loss of life in such extreme events in just the past few years.

Our states are already demonstrating that smart programs to curb carbon pollution and modernize the electricity sector go hand-in-hand with economic development and job creation. As your proposal recognizes, the most efficient and cost-effective new energy sources already meet the proposed standard, and the standard helps promote the next generation of advanced coal

¹ <http://www.apha.org/about/news/pressreleases/2010/epa+group+letter+release.htm>

technologies. This proposal is a major step forward in driving our national energy supply towards clean and efficient sources, which benefits the environment and the economy.

In addition to finalizing the proposed standards for new power plants, we urge USEPA to work with your state partners to determine the best approaches for gradually reducing carbon pollution from the existing power plant fleet. The Clean Air Act recognizes the key role of the states, acting under federal guidelines, to tailor solutions that reflect each state's unique resources, economy, and power mix, and to synchronize existing state initiatives to reduce emissions from the electric sector with federal efforts. We stand ready to work with each other, USEPA, industry, other stakeholders, and our own residents and businesses to get this job done in a thoughtful way.

We commend USEPA for getting started on this task. Cleaning up harmful carbon pollution from our power plants will protect our environment, save lives, and create jobs. We urge you to finalize the NSPS without delay.

Sincerely,



Mary D. Nichols, Chair
California Air Resources Board



Daniel C. Esty, Commissioner
CT Department of Energy & Environmental Protection



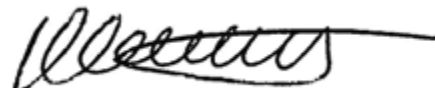
Collin O'Mara, Secretary
DE Department of Natural Resources & Environmental Control



Christophe A. G. Tulou, Director
District Department of the Environment



Robert M. Summers, Secretary
MD Department of the Environment



Kenneth L. Kimmell, Commissioner
MA Department of Environmental Protection



Dick Pedersen, Director
OR Department of Environmental Quality



Janet Coit, Director
RI Department of Environmental Management



David K. Mears, Commissioner
VT Department of Environmental Conservation



Ted Sturdevant, Director
WA State Department of Ecology

Cc: Gina McCarthy, Assistant Administrator, Office of Air and Radiation, US EPA
Janet McCabe, Deputy Assistant Administrator, Office of Air and Radiation, US EPA
Steve Page, Director, OAQPS, USEPA
Peter Tsirigotis, Director, Sector Policies and Programs Division, OAQPS, USEPA