

April 25, 2018

Environmental Protection Agency
EPA Docket Center (EPA/DC), Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility
Generating Units, Docket ID No. EPA-HQ-OAR-2017-0355

To Whom It May Concern:

The undersigned 94 conservation and public land advocacy organizations urge the Environmental Protection Agency (EPA) under Administrator Scott Pruitt to abandon its effort to repeal the Clean Power Plan (CPP). As advocates for the protection of our nation's public lands, we strongly request that the Trump administration instead move forward with expeditious implementation of this critical rule to reduce carbon dioxide pollution from power plants.

The high, and rapidly increasing level of carbon dioxide in the atmosphere is causing an unprecedented rise in temperatures and extreme weather events, increasingly harming our national parks, forests and wild lands and threatening the health of their millions of visitors and neighboring communities. The CPP is a vitally important step towards protecting national parks and wild lands from the worst threat they face – climate change.

Impacts to our public lands from climate change vary in intensity and scope, affecting coastal areas burdened by rising oceans and unusually powerful storms, mountain ranges experiencing widespread melting of glaciers, forests suffering from longer and more intense wildfires and wildlife from microorganisms to large mammals struggling with unpredictable and abnormal weather extremes. National parks like Glacier, Joshua Tree and Saguaro risk losing their namesake features; rising water levels are threatening the integrity of historic sites like Harriet Tubman Underground Railroad National Monument; and native species such as Brook Trout may not survive warmer stream temperatures in the Appalachian Mountains. Such devastating harms are eroding the very essence of what public lands, including national parks, across America intend to preserve and protect for future generations: wilderness, wildlife, heritage and culture.

Outdated coal-fired power plants are one of the most significant sources of unchecked carbon dioxide emissions that harms the health of our public lands and drives the deeply concerning climate change impacts such as those described above. By reducing carbon dioxide pollution from the power sector 32 percent below 2005 limits by 2030, the CPP serves as one critical step forward to address this source of climate pollution. These reductions are not only realistically attainable but are based on a flexible set of compliance options that will deliver up to \$93 billion in climate and public health benefits.

The CPP is built on a strong legal foundation, consistent with the Clean Air Act and U.S. Supreme Court precedent and is well supported by facts in the rulemaking record. This cost-effective program is also an outcropping of EPA's extensive engagement with industry, state and public stakeholders over the course of many years, which resulted in the "best system of emission reduction" of carbon dioxide from power plants that are interconnected by the electric grid. While coal plants are not always located directly next to our favorite national parks, wilderness areas, or forest trails, the pollution from these facilities knows

no boundaries. By reducing carbon dioxide emissions from them, we will mitigate the negative effects of climate change and other power plant pollution that harms our communities, public lands and waters.

EPA's current proposed repeal of the CPP and related Advanced Notice of Proposed Rulemaking together illustrate an improperly narrow interpretation of the Clean Air Act's mandate to reduce pollution that is dangerous to people and our environment. This course of action spells disaster for the public lands that belong to all Americans, our local economies, and health. Given that EPA's newly ascribed value of reducing carbon dioxide is near zero in terms of the impact to our changing climate, it is unclear what, if any, reductions may be anticipated from a CPP replacement rule. The Clean Air Act bestows EPA with the authority and responsibility to regulate harmful pollutants that threaten public health and our environment, including our national parks, wildlife, and other wild land resources; therefore, it is incumbent upon EPA to promptly act to implement and strengthen the CPP – not take steps to dismantle it.

We ask the Environmental Protection Agency to do its job and protect the environment by swiftly implementing the Clean Power Plan, for the health of the public, our planet and our public lands. Thank you for your consideration.

Sincerely,

Alaska Wilderness League

Appalachian Mountain Club

Archaeology Southwest

Association of New Jersey Environmental Commissions

Biodiversity for a Livable Climate

Butterfly Project NYC

California Native Plant Society

Center for Biological Diversity

Cigarette Butt Pollution Project

Citizens Regeneration Lobby

Coalition to Protect America's National Parks

Conservation Congress

Conservation Voters of Pennsylvania

Defenders of Wildlife

Delaware Nature Society

Eastern Pennsylvania Coalition for Abandoned Mine Reclamation

Elk Creeks Watershed Association

Environmental Protection Information Center
Friends of Acadia
Friends of Accotink Creek
Friends of Alewife Reservation
Friends of the Inyo
Great Old Broads for Wilderness
GreenLatinos
Greenpeace
HEAL Utah
Heartwood
Hispanic Access Foundation
Kentucky Heartwood
Klamath Forest Alliance
Lassen Forest Preservation Group
League of Conservation Voters
Los Padres ForestWatch
Kentucky Heartwood
Maryland Conservation Council
Massachusetts Forest Rescue
Mill Basin Civic Association
Millennium Development
Minnesota Center for Environmental Advocacy
Mono Lake Committee
Montana Conservation Voters Education Fund
mothering Mother
MountainTrue
National Parks Conservation Association
National Wildlife Federation
Natural Resources Defense Council
Nevada Conservation League

New Jersey Conservation Foundation
New York League of Conservation Voters
New York-New Jersey Trail Conference
North Cascades Conservation Council
Northeast Organic Farming Association, Massachusetts Chapter
NYC H2O
Olympic Park Associates
Oregon Wild
Park County Environmental Council
Pennsylvania Council of Churches
Plastic Tides
Powder River Basin Resource Council
Rachel Carson Council
RESTORE: The North Woods
Rock Creek Conservancy
Rockaway Artists Alliance
Rockaway Waterfront Alliance
Rocky Mountain Recreation Initiative
Rocky Mountain Wild
SAFE
San Juan Citizens Alliance
San Luis Valley Ecosystem Council
Sebago Canoe Club
Sequoia ForestKeeper®
Sheep Mountain Alliance
Sierra Club
Sierra Forest Legacy
Southern Appalachian Wilderness Stewards
Southern Utah Wilderness Alliance
SouthWings

Springfield Climate Justice Coalition
St. Croix River Association
St. Mary's River Watershed Association
Tennessee Citizens for Wilderness Planning
Tennessee Wild
The Enviro Show
The Wilderness Society
Valley Forge Park Alliance
Voyageurs National Park Association
Washington Wild
Waterkeepers Chesapeake
West Virginia Highlands Conservancy
Western Clean Energy Campaign
Wholly H2O
Wild South
WildEarth Guardians
Wyoming Wilderness Association