January 10, 2018

Scott Pruitt, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Opposition to Repeal of the Clean Power Plan

Dear Administrator Pruitt:

The Association to Preserve Cape Cod (APCC) strongly opposes the Environmental Protection Agency’s proposal to repeal the Clean Power Plan (CPP), and urges the EPA to reconsider its intentions to terminate this critically important national emissions control standard.

Established in 1968, APCC is the Cape Cod region’s leading nonprofit environmental organization, working for the adoption of laws, policies and programs that protect and enhance Cape Cod’s natural resources and quality of life. With ever-increasing urgency, much of APCC’s efforts in recent years have been focused on the need to address climate change and its impacts on Cape Cod. Climate change has emerged as the greatest environmental threat facing our region’s natural resources, economy and human population. Cape Cod communities are already experiencing worsening impacts from sea level rise, coastal erosion and an increase in frequency and severity of coastal storms associated with a changing climate.

The settled consensus of the world body of scientists, based on fact-based research and overwhelming evidence, is that carbon emissions from the burning of fossil fuels are the driving force behind climate change. The continued emission of CO2 pollution and other greenhouse gases into the atmosphere threatens the health, welfare and even the lives of American citizens and people worldwide. Some recent data suggests the world’s climate is at the brink of certain thresholds, that once crossed, will result in rapid, unpredictable and potentially irreversible catastrophic changes that will impact the Earth’s ecosystems and seriously disrupt human society.

Electrical power plants fired by fossil fuels are responsible for 31 percent of the greenhouse gas emissions in the U.S.—the single largest source of greenhouse gas pollution in the nation. Any effort to effectively reduce the greenhouse gasses that cause climate change must include a substantial reduction in power plant emissions levels. The CPP would achieve that objective.

Issuance of the CPP by the EPA in 2015, with its requirement for significant reductions in CO2 pollution emissions from power plants, has been the most important step to date taken by the U.S. to address climate change. Implementation of the CPP would set our nation on the right track toward mitigating climate change and its impacts, and it would secure the U.S.’s position as a responsible global partner in the effort to control CO2 emissions.
Emissions reductions in greenhouse gas pollutants resulting from CPP implementation would also reduce emissions of particle pollution, further improving public health in the U.S. The EPA’s own 2015 analysis estimates that the CPP would prevent 1,500 to 3,600 premature deaths, 90,000 asthma attacks in children, up to 1,700 heart attacks, 1,700 hospital admissions and 300,000 missed workdays.

Repeal of the CPP would be a disastrous reversal in our nation’s energy and emissions policies, and overlooks the investments being made and advances being achieved in the private sector and by individual states and cities in moving this nation toward a future built on reliable renewable energy production. Indeed, the proposed repeal suggests the EPA’s priorities rest with the financial interests of the coal industry instead of with the well-being and will of the American people.

The EPA has a legal requirement under the Clean Air Act—a requirement that was upheld by the U.S. Supreme Court—to regulate CO2 as a pollutant that endangers human health. Repeal of the CPP would be in direct conflict with the EPA’s charge to protect the nation’s environment and the health of its citizens, a responsibility entrusted to the agency since its establishment in 1970.

The CPP is an integral component in the necessary transition to a modern, clean, reliable and affordable national energy infrastructure, and it is an important air pollution standard that will help protect human health and the environment. APCC therefore once again urges the EPA to withdraw its proposal to repeal the Clean Power Plan.

Sincerely,

Andrew Gottlieb
Executive Director

cc: Sen. Edward Markey
    Sen. Elizabeth Warren
    Rep. William Keating