August 8, 2023

Mr. Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460


Dear Principal Deputy Assistant Administrator Goffman,

On behalf of The United States Conference of Mayors and the National League of Cities, we appreciate the opportunity to submit comments to the U.S. Environmental Protection Agency (EPA) regarding its proposed rule establishing standards and guidelines to reduce greenhouse gas (GHG) emissions from the power sector. As you know, local leaders are dedicated to ensuring the overall health, safety, and welfare of their residents, and are therefore supportive of the Administration's efforts to reduce GHG emissions, improve air quality, and mitigate the impacts of climate change.

Local leaders are on the frontlines in combating the climate change crisis. Fueled by a rapidly warming climate, extreme weather events have become both stronger and more frequent—a dangerous new trend. In the last year alone, communities have grappled with the effects of major hurricanes, flooding, wildfires, winter storms and severe weather. So far in 2023, there have been 12 weather and climate disasters where overall damages/costs have exceeded $1 billion, according to the National Oceanic and Atmospheric Administration, and June and July brought record-breaking heat waves across the country.

These events result in costly and catastrophic impacts on local and regional infrastructure, economies, public safety, public health and environmental quality. Additionally, the impacts of climate change and extreme weather events pose an especially pressing threat to persons with disabilities, economically disadvantaged households, the elderly, Black, Indigenous and People of Color, and other vulnerable and underrepresented populations that are most affected and least able to prepare, respond or recover.

As first responders to extreme weather events, local leaders across the nation have taken significant steps to strengthen their communities, advance climate action plans and invest in innovative strategies to transition towards a carbon-free economy. In doing
so, local leaders play a significant role in ensuring the implementation of equitable and enduring climate action. We are thankful for the historic climate investments from the federal government through the Infrastructure Investment and Jobs Act and the Inflation Reduction Act that will support local climate action. Billions of dollars and incentives are now available to communities for a wide array of decarbonization policies, projects and programs, raising cities’ potential to unlock the economic, health, and resilience benefits of affordable, clean energy.

Despite the progress local governments have made in reaching their climate mitigation and adaptation goals, it is clear our work is not done. We urge the federal government to be our partner in these efforts in support of the economy and building resilient communities. As a significant source of GHG emissions, the power sector represents a substantial opportunity to reduce harmful air pollution and protect the environment.

As EPA moves forward with this rulemaking, we strongly encourage the Agency to work with local governments to ensure the standards and guidelines are implemented through a cost-effective and flexible framework to achieve both attainable and the desired benefits. We further urge EPA to encourage states to work with local governments in developing state plans for meeting the carbon emission reduction targets. By establishing New Source Performance Standards for new natural gas plants and emissions guidelines for existing coal and natural gas plants, the proposed rule will bolster local efforts to protect public health and accelerate the transition towards a more clean and sustainable future.

In closing, thank you for considering the perspective of local officials as you move forward in this rulemaking process. We appreciate the opportunity to offer our support and comments on an issue of utmost importance to local governments. If you have any questions, please do not hesitate to contact our staff: Judy Sheahan, The United States Conference of Mayors (jsheahan@usmayors.org or 202-861-6775) and Carolyn Berndt, National League of Cities (berndt@nlc.org or 202-626-3101).

Sincerely,

Tom Cochran
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The U.S Conference of Mayors

Clarence E. Anthony
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