



THE UNITED STATES
CONFERENCE OF MAYORS

November 21, 2022

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

RE: Docket ID No. EPA-HQ-OAR-2022-0723

Dear Mr. Goffman,

On behalf of the National League of Cities and The U.S. Conference of Mayors, we appreciate the opportunity to submit comments on the U.S. Environmental Protection Agency's (EPA) forthcoming proposed regulatory revisions and emission guidelines to reduce greenhouse gas (GHG) emissions from new and existing Electric Generating Units (EGUs). We support the Administration's efforts to reduce GHG emissions across a broad sector of the economy, including the power sector, and advance actions to mitigate the effects of climate change. These federal efforts are critical because maintaining the status quo is not sufficient in meeting the challenges of climate change and addressing the inequities in our society.

Local leaders are seeing the impacts of climate change every day in their communities. The Fourth National Climate Assessment reports that the effects of climate change are being experienced in every state with evidence that human-induced climate change is continually increasing. The changing climate has exponentially increased the likelihood that cities, towns and villages will experience catastrophic extreme weather events in the future. These impacts, such as flooding, drought, wildfires, sea-level rise and severe storms, pose very real and significant threats to our members and the communities they serve. While these extreme weather events are becoming more frequent and more severe, local governments continue to be on the frontlines of this crisis. Local leaders' efforts are critical in preparing in advance of emergency situations, offering immediate assistance to those impacted, and identifying strategies, solutions, and partnerships to address situations quickly and efficiently.

The effects of climate change will be experienced in every community across the nation, yet the impacts of a rapidly changing climate will not be felt equally by everyone. Vulnerable populations, including persons with disabilities, economically disadvantaged households, the elderly, children, and Black, Indigenous and People of Color (BIPOC), are disproportionately affected by climate-related consequences. The coronavirus pandemic highlighted these inequities and historical policies and underinvestment that have long existed in our communities. This rulemaking provides an important

opportunity for EPA to not only reduce emissions and mitigate the effects of climate change, but also to address the disparate health impacts on these communities by improving air quality.

Communities small and large across the nation are taking local action on long-term and equitable climate mitigation efforts including adopting greenhouse gas reduction goals, pioneering and demonstrating cost-effective clean energy solutions, and pursuing local strategies which create jobs, save energy and taxpayer dollars, and promote renewable sources. Additionally, cities have pledged their commitment to meeting the goals of the Paris Climate Agreement—over 290 cities have signed the We Are Still In declaration to reaffirm climate action. Many of these same cities (over 180) are committed to 100% renewable energy by 2050, or in some cases sooner.

While cities are prepared to forge ahead on these initiatives and actions, we urge the federal government to be our partner in these efforts in support of the economy and to build resilient communities. The historic investments provided by recent federal legislation, such as the Infrastructure Investment and Jobs Act and the Inflation Reduction Act, will greatly assist local governments in their efforts to drive local climate action. Establishing a national policy framework for reducing greenhouse gas emissions and transitioning to a clean energy economy, such as EPA is pursuing with these rulemakings, will further support and advance local efforts.

We also expect that the rules, when final, will bring institutional focus and cooperation to the task of GHG reduction. We need strong commitments and actions from utilities to the broad range of energy efficiency and renewable energy development, as long as such efforts meet stringent tests of measurement and verifiability. The power sector represents the strongest institutional entities to reshape the nation's energy system in ways that are innovative, cost-efficient, and in the long-run significantly less reliant on GHG-emitting fuels.

In closing, thank you for considering the perspective of local elected 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 our nation's cities. If you have any questions, please do not hesitate to contact our staff: Carolyn Berndt, National League of Cities (berndt@nlc.org or 202-626-3101) and Judy Sheahan, The U.S. Conference of Mayors (jsheahan@usmayors.org or 202-861-6775).

Sincerely,



Clarence E. Anthony
CEO and Executive Director
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Tom Cochran
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