



WWW.CLIMATE-MAYORS.ORG • INFO@CLIMATE-MAYORS.ORG

February 20, 2018

By electronic mail (a-and-r-Docket@epa.gov) and first class mail

Administrator Scott Pruitt
Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mail Code 28221T
Attention Docket ID No. EPA-HQ-OAR-2017-0355
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Administrator Pruitt:

As mayors from 233 U.S. cities, we submit this letter of comment to oppose the Environmental Protection Agency's proposed repeal of the Clean Power Plan, *Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units*.¹

Collectively, we represent over 51 million residents, in 46 states & territories across the country. We strongly oppose the proposed repeal of the Clean Power Plan, which would put our citizens at risk and harm our efforts to address the urgent threat of climate change.

Climate Change is Global but Impacts are Felt Locally

Communities across the country are experiencing the effects of climate change today: sea level rise; hotter, longer, and more frequent heat waves; increased extreme weather; and many other harmful impacts. There is broad agreement that the future economic costs of climate change should not be overlooked. On our current path, the annual cost of coastal storm damage is expected to climb to as high as \$35 billion by the 2030s; coastal property valued at \$66 to \$106 billion will likely be underwater by 2050.²

No one is insulated from the impacts of climate change – people in cities of all sizes, along with suburban and rural communities are all at risk. Residents of our communities have experienced harmful impacts of climate change such as dirtier air, increased heat-related illnesses and deaths, damaged and disappearing coastlines, longer droughts and other strains on water quantity and quality, and increasingly frequent and severe storms and wildfires.

¹ 82 Fed. Reg. 48,035 (Oct. 16, 2017), EPA-HQ-OAR-2017-0355.

² Kate Gordon et al., *Risky Business: The Economic Risks of Climate Change in the United States* 3–4 (2014), http://riskybusiness.org/site/assets/uploads/2015/09/RiskyBusiness_Report_WEB_09_08_14.pdf.

Reducing greenhouse gas emissions is essential to protect our citizens against the worst impacts of climate change. A peer reviewed study conducted by EPA projected stark differences between a world in the year 2100 where global warming averages 2 degrees Celsius—a goal for which the Clean Power Plan is critical—and one in which global warming averages 4 degrees Celsius: 57,000 fewer domestic deaths per year due to poor air quality; 12,000 fewer domestic deaths per year from extreme heat and cold in 49 U.S. cities; up to \$6.4 billion in avoided annual adaptation costs from severe precipitation in 50 U.S. cities; \$3.1 billion in avoided annual damages and adaptation costs from sea level rise and storm surge on the coasts; and up to \$2.5 billion in avoided damages from inland flooding.³

Repealing the Clean Power Plan Would Slow Local Efforts to Address Climate Change

Not only are climate change impacts felt locally — our communities are also where climate change adaptation and mitigation efforts are being implemented. Urban, suburban, and rural communities across the country are reducing their contributions to greenhouse gas emissions by investing in energy efficiency, committing to the use of clean energy resources, and reducing reliance on fossil-fueled energy sources—efforts that protect against climate change, and also support clean air and a vibrant clean energy economy.

But the legal authority of cities and other municipalities generally extends only as far as their state governments and federal law allow, and as a result, our local efforts to address climate change are highly sensitive to national policies like the Clean Power Plan, which shape markets, steer state action, and have large direct impacts on nationwide emissions.

We would benefit from the support and certainty that a federal framework for reducing the power sector's greenhouse gas emissions could provide. The Clean Power Plan, by providing such a framework, would enhance ongoing local efforts and enable new local initiatives to improve public health, increase air quality, and reduce greenhouse gas emissions through energy innovation.

We would like to reiterate a statement that more than 25 mayors delivered during the course of the Clean Power Plan development: “[W]e cannot act alone. We need the federal government to provide a path forward to making meaningful reductions in carbon pollution while preparing for the impacts of climate change.”⁴

As 233 mayors of communities across the U.S., representing over 51 million residents in 46 states & territories we strongly oppose the repeal of the Clean Power Plan, which would put our citizens at risk and undermine our efforts to prepare for and protect against the worst impacts of climate change.

Sincerely,

Mayor Peggy McQuaid
Albany, CA

Mayor Kathy Sheehan
Albany, NY

³ U.S. Environmental Protection Agency, Climate Change in the United States: Benefits of Global Action (2015), <https://www.epa.gov/cira>.

⁴ Mayors National Climate Action Agenda, 27 Mayors’ Letter to President Obama, June 18, 2015, <http://climatemayors.org/actions/letters-and-%20statements/#letter-to- the-president- june- 2015>.

Mayor Tim Keller
Albuquerque, NM

Mayor Ed Pawlowski
Allentown PA

Mayor Gary Goosman
Amesville, OH

Mayor Sofia Pereira
Arcata, CA

Mayor Nancy Kaboolian
Ardsley, NY

Mayor Esther Manheimer
Asheville, NC

Mayor Steve Skadron
Aspen, CO

Mayor Keisha Lance Bottoms
Atlanta, GA

Mayor Steve Adler
Austin, TX

Mayor Catherine E. Pugh
Baltimore, MD

Mayor Kelli Linville
Bellingham, WA

Mayor Jesse Arreguin
Berkeley, CA

Mayor Robert J. Donchez
Bethlehem, PA

Mayor Michael P. Cahill
Beverly, MA

Mayor Lili Bosse
Beverly Hills, CA

Mayor Leslie Hager-Smith
Blacksburg, VA

Mayor David H. Bieter
Boise, ID

Mayor Martin J. Walsh
Boston, MA

Mayor Suzanne Jones
Boulder, CO

Mayor Joseph P. Ganim
Bridgeport, CT

Mayor W. Clarke Conway
Brisbane, CA

Mayor Brenda J. Hess
Buchanan, MI

Mayor Byron W. Brown
Buffalo, NY

Mayor Miro Weinberger
Burlington, VT

Mayor Edwin García Feliciano
Camuy, PR

Mayor Robert J. Moffatt, VMD
Cape May Point, NJ

Mayor Jim Brainard
Carmel, IN

Mayor Mike Webb
Carver, MN

Mayor Pam Hemminger
Chapel Hill, NC

Mayor John Tecklenburg
Charleston, SC

Mayor Scott Rogers
Charles Town, WV

Mayor Andy Berke
Chattanooga, TN

Mayor Chuck Cahn
Cherry Hill, NJ

Mayor Rahm Emanuel
Chicago, IL

Mayor Mary Casillas Salas
Chula Vista, CA

Mayor John Cranley
Cincinnati, OH

Mayor Ted Terry
Clarkston, GA

Mayor Frank G. Jackson
Cleveland, OH

Mayor Patrick Wojahn
College Park, MD

Mayor Brian Treece
Columbia, MO

Mayor Steve Benjamin
Columbia, SC

Mayor Jeff Katz
Cooperstown, NY

Mayor Raul Valdes-Fauli
Coral Gables, FL

Mayor Carla Condon
Corte Madera, CA

Mayor Brian Tobin
Cortland, NY

Mayor Biff Traber
Corvallis, OR

Mayor Mark Landman
Cotati, CA

Mayor Roger W. Foster
Crete, NE

Mayor Darcy Paul
Cupertino, CA

Mayor Mike Rawlings
Dallas, TX

Mayor Juslyn Manalo
Daly City, CA

Mayor Robb Davis
Davis, CA

Mayor Cary Glickstein
Delray Beach, FL

Mayor Michael B. Hancock
Denver, CO

Mayor Josh Maxwell
Downingtown, PA

Mayor David Haubert
Dublin, CA

Mayor Roy D. Buol
Dubuque, IA

Mayor Emily Larson
Duluth, MN

Mayor Stephen M. Schewel
Durham, NC

Mayor Brad Cohen
East Brunswick Township, NJ

Mayor Mark S. Meadows
East Lansing, MI

Mayor Nancy Tyra-Lukens
Eden Prairie, MN

Mayor James Hovland
Edina, MN

Mayor Dave Earling
Edmonds, WA

Mayor David Kaptain
Elgin, IL

Mayor John J. Bauters
Emeryville, CA

Mayor Lucy Vinis
Eugene, OR

Mayor Stephen H. Hagerty
Evanston, IL

Mayor Karl W. Kassel
Fairbanks North Star Borough, AK

Mayor Ed Malloy
Fairfield, IA

Mayor Peter Lindstrom
Falcon Heights, MN

Mayor David Tarter
Falls Church, VA

Mayor Colleen Mahr
Fanwood, NJ

Mayor Lioneld Jordan
Fayetteville, AR

Mayor David Coulter
Ferndale, MI

Mayor Lindy Peters
Fort Bragg, CA

Mayor Wade Troxell
Fort Collins, CO

Mayor John P. “Jack” Seiler
Fort Lauderdale, FL

Mayor Thomas C. Henry
Fort Wayne, IN

Mayor Bob Scott
Franklin, NC

Mayor Lily Mei
Fremont, CA

Mayor Gary Wilkinson
Frisco, CO

Mayor Lauren B. Poe
Gainesville, FL

Mayor J Kachen Kimmell
Gambier, Ohio

Mayor Karen Freeman-Wilson
Gary, IN

Mayor Tammy Stempel
Gladstone, OR

Mayor Bruce J Packer
Glen Rock, NJ

Mayor Marjorie Sloan
Golden, CO

Mayor Paula Perotte
Goleta, CA

Mayor Rosalynn Bliss
Grand Rapids, MI

Mayor Emmett V. Jordan
Greenbelt, MD

Mayor Peter Swiderski
Hastings-on-Hudson, NY

Mayor Harry Kim
County of Hawai'i, HI

Mayor Barbara Halliday
Hayward, CA

Mayor Nancy Rotering
Highland Park, IL

Mayor Gayle Brill Mittler
Highland Park, NJ

Mayor Ravinder S. Bhalla
Hoboken, NJ

Mayor Josh Levy
Hollywood, FL

Mayor Alex Morse
Holyoke, MA

Mayor Kirk Caldwell
Honolulu, HI

Mayor Paul Blackburn
Hood River, OR

Mayor Sylvester Turner
Houston, TX

Mayor Candace B. Hollingsworth
Hyattsville, MD

Mayor Serge Dedina
Imperial Beach, CA

Mayor Jim Throgmorton
Iowa City, IA

Mayor Svante Myrick
Ithaca, NY

Mayor Pete Muldoon
Jackson, WY

Mayor Sly James
Kansas City, MO

Mayor Bernard P. Carvalho Jr
Kauai, HI

Mayor John Antaramian
Kenosha, WI

Mayor Steve Noble
Kingston, NY

Mayor Madeline Rogero
Knoxville, TN

Mayor Tim Kabat
La Crosse, WI

Mayor Robert Blais
Lake George Village, NY

Mayor Adam Paul
Lakewood, CO

Mayor Danene Sorace
Lancaster, PA

Mayor William J Sprague
Lapeer, MI

Mayor Ken Miyagishima
Las Cruces NM

Mayor Craig A. Moe
Laurel, MD

Mayor Theodore Becker
Lewes, DE

Mayor Robert Garcia
Long Beach, CA

Mayor Adam Schneider
Long Branch, NJ

Mayor Eric Garcetti
Los Angeles, CA

Mayor Greg Fischer
Louisville, KY

Mayor Paul Soglin
Madison, WI

Mayor Joyce Craig
Manchester, NH

Mayor Amy Howorth
Manhattan Beach, CA

Mayor Barry J. Greenberg
Maplewood, MO

Mayor Alan M. Arakawa
Maui, HI

Mayor Stephanie M. Burke
Medford, MA

Mayor Jim Strickland
Memphis, TN

Mayor Dan Gelber
Miami Beach, FL

Mayor Gurdip Brar, Ph.D.
Middleton, WI

Mayor Daniel T. Drew
Middletown, CT

Mayor Sean Strub
Milford, PA

Mayor Jeff Silvestrini
Millcreek, UT

Mayor Tom Barrett
Milwaukee, WI

Mayor John Engen
Missoula, MT

Mayor Mary O'Connor
Monona, WI

Mayor Jamie Irons
Morro Bay, CA

Mayor Arlene Burns
Mosier, OR

Mayor Lenny Siegel
Mountain View, CA

Mayor Frederick T. Courtright
Mount Pocono, PA

Mayor Jill Techel
Napa, CA

Mayor Megan Barry
Nashville, TN

Mayor Kristopher Larsen
Nederland, CO

Mayor Jon Mitchell
New Bedford, MA

Mayor Donna D. Holaday
Newburyport, MA

Mayor Toni N. Harp
New Haven, CT

Mayor Mitchell J. Landrieu
New Orleans, LA

Town Supervisor Neil Bettez
New Paltz, NY

Mayor Bill de Blasio
New York City, NY

Mayor Paul A. Dyster
Niagara Falls, NY

Mayor David J. Narkewicz
Northampton, MA

Mayor Smith Joseph D.O., Pharm.D.
North Miami, FL

Mayor Don Hammond
Nyack, New York

Mayor Johnny Johnston
Ojai, CA

Mayor Cheryl Selby
Olympia, WA

Mayor Buddy Dyer
Orlando, FL

Mayor Victoria Gearity
Ossining, NY

Mayor Andy Beerman
Park City, UT

Mayor Donald R. Grebien
Pawtucket, RI

Mayor Frank C. Ortis
Pembroke Pines, FL

Mayor Jim Kenney
Philadelphia, PA

Mayor Cindy Perry
Pittsboro, NC

Mayor Jeremy Johnson
Pittsburg, KS

Mayor William Peduto
Pittsburgh, PA

Mayor Kurt R. Metzger
Pleasant Ridge, MI

Mayor Ethan Strimling
Portland, ME

Mayor Ted Wheeler
Portland, OR

Mayor Deborah Stinson
Port Townsend, WA

Mayor Jorge O. Elorza
Providence, RI

Mayor Paul Kuhns
Rehoboth Beach, DE

Mayor Hillary Schieve
Reno, NV

Mayor Tom Butt
Richmond, CA

Mayor Levar M. Stoney
Richmond, VA

Mayor Lovely Warren
Rochester, NY

Mayor Darrell Steinberg
Sacramento, CA

Mayor Jacob Day
Salisbury, MD

Mayor Jackie Biskupski
Salt Lake City, UT

Mayor Ron Nirenberg
San Antonio, TX

Mayor Kevin Faulconer
San Diego, CA

Mayor Mark Farrell
San Francisco, CA

Mayor Sam Liccardo
San José, CA

Mayor Pauline Russo Cutter
San Leandro, CA

Mayor Heidi Harmon
San Luis Obispo, CA

Mayor Rick Bonilla
San Mateo, CA

Mayor David J. Terrazas
Santa Cruz, CA

Mayor Javier M. Gonzales
Santa Fe, NM

Mayor Ted Winterer
Santa Monica, CA

Mayor Shelli Freeland Eddie
Sarasota, FL

Mayor Chris Lain
Savanna, IL

Mayor Jenny Durkan
Seattle, WA

Mayor George Van Dusen
Skokie, IL

Mayor Ken Wray
Sleepy Hollow, NY

Mayor Scott Saunders
Smithville, TX

Mayor Matthew R. Larson
Snoqualmie, WA

Mayor Jeffrey Slavin
Somerset, MD

Mayor Dana S. Hilliard
Somersworth, NH

Mayor Joseph A. Curtatone
Somerville, MA

Mayor Philip Stoddard
South Miami, FL

Mayor Sheena C. Collum
South Orange Village, NJ

Mayor Domenic J. Sarno
Springfield, MA

Mayor David Martin
Stamford, CT

Mayor Donald M. Hahn
State College, PA

Mayor Lyda Krewson
St. Louis, MO

Mayor Michael Tubbs
Stockton, CA

Mayor Glenn Hendricks
Sunnyvale, CA

Mayor Daniel Dietch
Surfside, FL

Mayor Tim Kearney
Swarthmore, PA

Mayor Thomas Fromm
Swedesboro, NJ

Mayor Kate Stewart
Takoma Park, MD

Mayor Drew Fixell
Tarrytown, NY

Mayor Sean Murphy
Telluride, CO

Mayor Jim Carruthers
Traverse City, MI

Mayor Jonathan Rothschild
Tucson, AZ

Mayor Brian P. Stack
Union City, NJ

Mayor Shelley Welsch
University City, MO

Mayor Dave Chapin
Vail, CO

Mayor Kevin J. Ryan
Verona, NJ

Mayor Muriel Bowser
Washington, DC

Mayor Lowell Hurst
Watsonville, CA

Mayor John Heilman
West Hollywood, CA

Mayor John Dennis
West Lafayette, IN

Mayor Daniel J. Stermer
Weston, FL

Mayor Jeri Muoio
West Palm Beach, FL

Mayor Christopher Cabaldon
West Sacramento, CA

Mayor Daniel Corona
West Wendover, NV

Mayor Bud Starker
Wheat Ridge, CO

Mayor Thomas Roach
White Plains, NY

Mayor Mike Spano
Yonkers, NY