October 31, 2018

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


The 80 undersigned conservation and public land advocacy organizations urge the Environmental Protection Agency (EPA) under Acting Administrator Andrew Wheeler to abandon its effort to replace the Clean Power Plan (CPP). As advocates for the protection of our nation’s public lands, we strongly request the Trump administration instead move forward with expeditious strengthening and implementation of the Clean Power Plan to reduce carbon dioxide pollution and achieve the myriad co-benefits of reducing emissions from power plants.

The high, and rapidly increasing levels of carbon dioxide in the atmosphere, as documented by the president’s own agency staff¹, 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. Reducing climate pollution 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 to survive with unpredictable and abnormal weather extremes. In fact, recent research from the University of California at Berkeley² indicates that our national parks are warming at twice the rate of the nation’s average, causing more harm faster. This research also indicates that a reduction in greenhouse gas emissions could reduce projected temperature increases in national parks by one-half to two-thirds.

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 were created to preserve and protect for future generations: wilderness, wildlife, heritage and culture.

¹ The final environmental impact statement for the Safer Affordable Fuel Efficient (SAFE) Vehicles Rule for Model Year 2021–2026 Passenger Cars and Light Trucks from the National Highway Traffic Safety Administration indicates that on its current course, the planet will warm seven degrees by the end of this century.
Outdated coal-fired power plants are one of our nation’s most significant sources of unchecked carbon dioxide emissions that harms the health of our public lands and drives the deeply concerning climate change impacts as described above. EPA's analysis of the CPP showed that it would reduce carbon dioxide pollution from the power sector 32 percent below 2005 limits by 2030 and would serve as one critical step forward to address this source of climate pollution. These reductions are not only readily attainable but are based on a flexible set of compliance options that EPA estimated would deliver up to $93 billion in climate and public health benefits. The CPP reflected and solidified trends already occurring in the electric sector, which is continuing to transition to less carbon-intensive ways of producing electricity. EPA’s replacement rule does the opposite—driving increases in air pollution and requiring zero climate pollution cuts.

By advancing this new, misguided proposal to replace the CPP, the EPA is ignoring the urgent need for climate action and disregarding the power sector’s massive contribution to the problem. The replacement rule fails to require any nation-wide limits on carbon pollution from power plants by allowing states to choose untethered emissions standards or decline to limit a plant’s emissions at all.

Further compounding the backwards direction of this proposal are provisions related to New Source Review, which if finalized would dramatically weaken this essential Clean Air Act permitting program. The proposal removes long-standing requirements for polluting sources to install modern pollution controls when making major investments that lead to increased air pollution. By removing these requirements, EPA is creating a gaping loophole for polluters, leaving unchecked emissions the Clean Air Act is designed to guard against. As a result, communities, national parks and wilderness areas across America could experience a significant degradation of air quality and consequent health risks to the people and employees who spend time in them.

By abandoning its legal obligation under the Clean Air Act to reduce air and climate pollution, this proposal signals EPA’s abdication of duty, putting public health and wild lands across the nation at risk. Placing the interests of industry polluters ahead of our communities’ right to clean air and a safe climate is unacceptable. We urge the EPA to withdraw the proposed rule and instead work to strengthen and implement the Clean Power Plan to reduce dangerous air and climate pollution, for the health of all people, our planet and our public lands. Thank you for your consideration.

Sincerely,

350 Santa Cruz  
Alaska Wilderness League  
American Bird Conservancy  
Appalachian Mountain Club  
Archaeology Southwest  
Arise for Social Justice  
California Communities Against Toxics  
Center for Biological Diversity  
Central California Asthma Collaborative  
Central California Environmental Justice Network  
Clean Air Coalition of North Whittier and Avocado Heights  
Climate Hawks Vote  
Coalition to Protect America's National Parks  
Conservation Congress  
Conservatives for Responsible Stewardship  
Defenders of Wildlife  
Delaware Nature Society  
Diné Citizens Against Ruining our Environment  
Earthjustice  
Environment America  
Environmental Law and Policy Center  
Environmental Protection Information Center  
Food and Water Watch  
Friends of Accotink Creek
Friends of Alewife Reservation
Friends of the Inyo
Friends of the Wild Swan
Great Old Broads for Wilderness
GreenLatinos
Greenenvironment, LLC
HEAL Utah
Hip Hop Caucus
Klamath Forest Alliance
Lassen Forest Preservation Group
Maryland Conservation Council
Massachusetts Forest Rescue
Minnesota Center for Environmental Advocacy
mothering Mother
Mothers of East Los Angeles
MountainTrue
National Parks Conservation Association
Natural Resources Defense Council
Nevada Conservation League
New York-New Jersey Trail Conference
NYC H2O
Olympic Park Associates
Oregon Wild
Park County Environmental Council
Pennsylvania Council of Churches
Powder River Basin Resource Council
Rachel Carson Council
RESTORE: The North Woods

Rocky Mountain Wild
San Juan Citizens Alliance
San Luis Valley Ecosystem Council
Santa Cruz Climate Action Network
Save Our Sky Blue Waters
Sequoia Forestkeeper®
Sheep Mountain Alliance
Sierra Institute for Community and Environment
South Yuba River Citizens League
Southern Appalachian Wilderness Stewards
Southern Utah Wilderness Alliance
SouthWings
St. Mary's River Watershed Association
Swan View Coalition
Tennessee Citizens for Wilderness Planning
Tennessee Wild
The Enviro Show
The Wilderness Society
United By Blue
Valley Forge Park Alliance
Voyageurs National Park Association
Washington Wild
Waterkeepers Chesapeake
West Virginia Highlands Conservancy
Wholly H2O
WildEarth Guardians
Wilderness Workshop
Wyoming Wilderness Association