



National Association of County & City Health Officials

The National Connection for Local Public Health

January 5, 2018

Administrator Scott Pruitt
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20004

RE: Comments on Proposed Rule: Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units; Docket ID: EPA-HQ-OAR-2017-0355-0002

The National Association of County and City Health Officials (NACCHO) urges the Environmental Protection Agency (EPA) to preserve existing regulations that protect the nation's air and water, and rescind the Executive Order that would weaken or otherwise hinder the work of the agency to update and enforce strong limits on dangerous air pollution outlined in the Clean Power Plan.

NACCHO is the voice of the 3,000 local health departments across the country that work every day to ensure the safety of the water we drink, the food we eat, and the air we breathe. NACCHO supports the Clean Power Plan to reduce carbon and other air pollutants that cause asthma attacks, heart attacks and premature death.

Local health departments want to ensure the estimated health benefits of the Clean Power Plan are realized, including preventing up to 3,600 premature deaths by 2030, preventing 90,000 asthma attacks and avoiding 300,000 days missed from work and school each year. These health benefits will only come if states develop effective plans to meet the requirements set out by the EPA in the Clean Power Plan. And for those states who refuse to comply, it is critical that EPA have a way to ensure emissions reductions by taking action at the federal level. NACCHO supports this essential step of reducing carbon emissions using the emissions standards set in the Clean Power Plan, and anticipate that states will be able to use the recommendations in these plans to reduce carbon emission even more than the Plan requires.

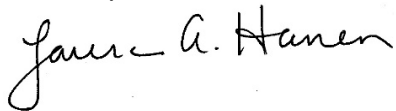
Repeal of the Clean Power Plan would be deleterious in other ways. Elevated levels of ozone and air pollution from higher temperatures can lead to worsening wildfires, such as those now threatening and destroying West Coast communities. Hotter air temperatures and longer summers due to increased carbon pollution and other emissions increase the risk of mosquito and tick-borne diseases, including Lyme disease. In addition, a changing climate threatens the more vulnerable among us, including children, seniors, those living in low-income communities, and minorities.



Therefore, NACCHO asks you to support full implementation of the Clean Power Plan and resist any efforts to weaken, delay or block progress toward the continued implementation of these vital public health protections. Further, we ask that you speak out publicly in defense of the necessity for all Americans to breathe healthy air.

NACCHO appreciates the opportunity to provide you with this input. We look forward to continuing to work with EPA. Please contact Ian Goldstein, Government Affairs Specialist for further information at 202-507-4273 or igoldstein@naccho.org.

Sincerely,

A handwritten signature in black ink that reads "Laura A. Hanen". The signature is written in a cursive style with a large initial "L" and a long, sweeping underline.

Laura A. Hanen, MPP
Interim Executive Director/Chief of Government Affairs