



# **FIGHTING FOR A HEALTHY MASSACHUSETTS**

## **STOPPING ILLEGAL FEDERAL ENVIRONMENTAL ATTACKS & ROLLBACKS**

OFFICE OF MASSACHUSETTS ATTORNEY GENERAL MAURA HEALEY







## INTRODUCTION

Our work to protect human health and the environment in Massachusetts cannot stop at state borders. The ways that the federal government and other states use energy and protect air, water, and wildlife affect every Massachusetts resident.

For instance, pollution from power plants, cars, and trucks outside of our state borders does not stay there—chemicals that cause smog and respiratory disease blow into our state from many miles away and dirty our air, while greenhouse gas emissions accumulate in the atmosphere and accelerate climate change that is already causing harm and increasing costs for Massachusetts communities. Contaminated rivers in Vermont and New Hampshire are not just those states' problems; polluted waters flow into our state and make it more difficult and expensive for our communities to keep our lakes, streams, and drinking water clean. And offshore oil and gas drilling in the Atlantic Ocean would injure sensitive wildlife and habitats that are critical to Massachusetts' vital commercial and recreational fishing industries.

When it comes to protecting our health and environment, states aren't the only ones in charge. Many issues important to Massachusetts, from approving new interstate pipelines, to protecting migratory birds and reducing pollution burdens in our most vulnerable communities, also fall under the responsibility of the federal government. And state and federal regulators work together to manage many environmental risks and natural resources, including dangerous chemicals, air and water pollution, and endangered wildlife.

We need the federal government to do its job to ensure a level playing field for environmental protection across the country. By illegally rolling back, delaying, or ignoring environmental laws, the federal government is failing its duty to protect our environment and our health. The Massachusetts Attorney General's Office is fighting back.

## What is environmental law, and why does it matter?

Environmental law focuses on the protection of public health and our precious natural resources—water, soil, air, and wildlife. Environmental problems such as climate change and pollution affect each and every one of us by harming our health, our state’s economy, and the natural resources we enjoy.

Recognizing that, Congress has passed federal environmental laws, including the Clean Air and Water Acts, the Endangered Species Act, and the National Environmental Policy Act, to name a few. Those laws require federal agencies (and sometimes, states) to take sensible actions to limit dangerous pollution from some of the biggest sources, to protect resources that cross state borders, and to consider how government decisions will impact human health and the environment in Massachusetts.

## How do federal environmental laws affect Massachusetts?

The air we breathe, the water we drink, and the food we eat are all affected by federal laws and policies. Laws such as the Clean Air and Water Acts, which have been in place for decades, set standards for the safety and quality of our air and water. Other federal policies shape our energy system, address climate change, conserve endangered species, and prevent toxic spills, among other things.

Strong federal environmental laws and policies are essential to keeping our families safe and our businesses running smoothly. Federal agencies like the Environmental Protection Agency (EPA) are responsible for ensuring that environmental standards are robust and up-to-date. They also enforce those standards against illegal polluters, companies that fail to take proper precautions, and other law-breakers.



**CLIMATE PROTECTION**



**HEALTHY AIR**



**CLEAN WATER**



**AFFORDABLE CLEAN ENERGY**



**SAFEGUARDS TO PREVENT  
CHEMICAL SPILLS &  
EXPLOSIONS**



**PROPER MANAGEMENT  
OF PESTICIDES &  
DANGEROUS TOXINS**



**WILDLIFE  
PRESERVATION**



**PROTECTING OUR OCEAN  
FROM OFFSHORE DRILLING**



**COST-SAVING ENERGY  
EFFICIENCY STANDARDS**



## IMPORTANT ENVIRONMENTAL PROTECTIONS ARE AT RISK

The Trump Administration is engaged in a concerted effort to delay, weaken, and repeal critical environmental policies. Unless stopped, that effort will jeopardize decades of progress in cleaning up the environment and protecting human health.

The rules under attack include standards for climate-warming emissions from power plants, cars, and trucks, rules that protect vulnerable communities from toxic air pollution, policies to preserve wildlife on the brink of extinction, and more.

The Administration is also taking aim at important procedures and safeguards that guide the federal government's decisionmaking about issues that affect our environment—for instance, by seeking to undermine the role of scientific research and to eliminate consideration of climate change and health harms.

On top of that, EPA and other federal agencies have drastically cut back their efforts to enforce the rules still on the books, giving a free pass to violators and creating more work for states.

***It is estimated that the Trump Administration's rollbacks of a few key climate protections will cause at least 1.8 billion more metric tons of greenhouse gas emissions by 2035. That's more than the annual emissions of the energy sectors in Canada, Germany, and Britain, combined.***

Source: New York Times







## WHAT TOOLS DOES THE ATTORNEY GENERAL HAVE TO FIGHT BACK?

As Massachusetts' Chief Law Enforcement Officer, Attorney General Healey is empowered with a variety of tools to fight illegal rollbacks and ensure the federal government fulfills its responsibilities to protect Massachusetts residents from health and environmental harms.

Since January 2017, the Attorney General's Office has taken more than 200 actions challenging the Trump Administration's attempts to gut environmental protections.

### **Participation in Decisionmaking**

When environmental protections are on the line, it is important that Massachusetts residents' voices are heard.

Our office routinely sends detailed letters to decisionmakers in Washington, DC informing them of how issues impact residents of Massachusetts and emphasizing the federal government's duties under the law to protect our health and economy from environmental harm. Those comments also help us build our case should we ultimately need to challenge an agency's decision in court.

In addition, we testify at public hearings and meet with agency and White House representatives to advocate on behalf of the people of Massachusetts.

### **Collaboration with Partners in Other States**

Our office often acts in collaboration with other states that share similar concerns and goals. Acting together amplifies the voices of our residents to decisionmakers on Capitol Hill and in courtrooms across the country.

### **Litigation**

When we need to take the federal government to court, we sue. Lawsuits are an important tool to stop the Trump Administration from illegally rolling back or ignoring important laws that protect Massachusetts residents.

We also file "friend of the court" briefs in lawsuits across the country to ensure Massachusetts' interests are represented on issues that matter to our state.

Because court rulings set precedent for what future administrations can and cannot do, lawsuits can have a broad impact on public health and the environment in Massachusetts for years to come.



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## A TRADITION OF PROTECTING THE ENVIRONMENT

The Massachusetts Attorney General's Office has a long history of advocacy for strong federal environmental protections. Through landmark court battles and negotiations, the Attorney General's Office has fought for a clean, healthy environment for the people of Massachusetts.

### **Massachusetts v. EPA**

In *Massachusetts v. EPA*, a coalition of states, cities, and environmental groups challenged EPA's refusal to regulate climate-warming greenhouse gas pollution under the Clean Air Act.

EPA claimed that it lacked legal authority to regulate greenhouse gases, and even if it had such authority, it would choose not to use it. The Supreme Court agreed with us and ruled that EPA has a duty to regulate greenhouse gas emissions if, after considering the scientific evidence, it finds those emissions pose a danger to human health and welfare.

This major win paved the way for much of our current federal work to protect the air we breathe and our climate. In direct response to the Supreme Court's ruling, EPA concluded that greenhouse gases are dangerous to human health and welfare. EPA subsequently developed regulations to limit emissions from new cars and trucks, power plants, oil and gas facilities, and other sources. Our office has steadfastly supported and defended those regulations from attacks from dirty energy companies, as well as the Trump Administration's attempts to weaken or roll back protections.







## **Volkswagen Emissions Cheating Scandal**

The Attorney General's Office secured settlements valued at more than \$100 million for Massachusetts in our case against Volkswagen, Audi, and Porsche over those companies' deliberate installation of devices designed to cheat state emissions tests (including devices in approximately 14,000 vehicles in Massachusetts). Those vehicles emitted harmful smog-causing pollutants at levels up to 40-times higher than legal limits.

Volkswagen was compelled to offer buy-backs, early lease terminations, or emissions control modifications to the owners or lessees of at least 85% of all affected vehicles, is investing \$2 billion to promote the use of electric and other zero-emission vehicles across the country, and established a \$3 billion trust to fund projects to offset harmful air pollution, with more than \$75 million for projects in Massachusetts.

## **Controlling Mercury & Air Toxics**

Our office has long advocated for EPA to set limits on emissions of hazardous and toxic air pollutants, including mercury, from power plants. Exposure to mercury poses serious health harms that disproportionately affect certain populations, including American Indian tribal communities and Asian and Pacific Islander communities. Federal emission limits reduce not only mercury but also harmful particulate matter pollution that leads to adverse health effects, such as asthma and heart disease, that significantly affect low-income and minority communities.

Many of Massachusetts' lakes and streams are unsafe for fishing due to mercury contamination, and out-of-state power plants are a major contributor to the problem. Because toxic air emissions can travel long distances and cross state boundaries, strong federal limits are essential to protect our residents.

As a result of our and others' advocacy, EPA adopted the Mercury and Air Toxics Standards—the federal rule that limits mercury and other toxic air emissions from power plants. The Standards have saved tens of thousands of people from premature death each year, with health and environmental benefits that vastly outweigh costs to industry.

Now, we are fighting the Trump Administration's attempts to undermine the Standards. In July 2020, we led a coalition of 25 states and local governments in suing EPA over its illegal attempt to reverse course and find that the Standards are no longer appropriate.



## CASE SPOTLIGHTS

### **Protecting Standards for Cleaner Cars & Trucks**

Climate change endangers human health in numerous ways, from increasing heat-related deaths, to harmful air quality impacts and facilitating the spread of infectious diseases. These health burdens disproportionately fall on already vulnerable communities. But the Trump Administration just finalized a rule rolling back federal limits on tailpipe pollution from cars and trucks. This rollback will add nearly a billion tons of climate-warming emissions and worsen air quality in Massachusetts and across the country, leading to hundreds of premature deaths from air pollution during the coronavirus crisis and beyond. It will also result in Americans spending tens of billions of dollars more on gas.

Together with our state partners, our office is fighting the Trump Administration's rollback in court. The Administration blatantly disregards scientists' warnings that rolling back emissions standards will accelerate temperature increases, ocean warming, and sea level rise, and increase hospitalizations and extreme weather events. The rollback also threatens Massachusetts' ability to comply with its legal mandate to eliminate its net greenhouse gas emissions by 2050.

We are also suing to fight the Administration's illegal attack on Massachusetts' authority to set its own clean car standards to protect our residents and climate.

### **Limiting Harmful Emissions from Power Plants**

In August 2019, our office sued EPA over its illegal and dangerous new rule to replace the Clean Power Plan, the landmark nationwide regulations that limited carbon pollution from fossil fuel-burning power plants. The Trump Administration's Affordable Clean Energy Rule, aka the "Dirty Power Rule," rolls back the Clean Power Plan's limits and will result in significantly more air pollution and increased risks of premature death and pollution-related disease.

### **Protecting Our Ocean from Oil & Gas Drilling**

Our office has been a leader in fighting the Trump Administration's attempts to open the Atlantic Ocean to oil and gas drilling. We have filed extensive comments raising serious concerns about the harmful impacts of offshore drilling on marine life, ocean health, and the state's vital fishing and tourism industries.

And in 2018, we joined a lawsuit challenging the Administration's plan to allow harmful, explosive underwater tests for offshore oil and gas resources in the Atlantic Ocean, which paves the way for future harmful drilling.

### **Defending Reliable Science**

The Trump Administration is trying to prevent EPA from relying on important studies that show how pollution harms public health, particularly in environmental justice communities. And the Administration has pushed to roll back important requirements for public review of environmental impacts of major federal projects under the National Environmental Policy Act. We will continue to stand up for science and oppose these and other efforts to hide or ignore the real-world impacts of environmental damage.



# KEY VICTORIES

## CLIMATE PROTECTION

In 2017, we led a group of states in a lawsuit successfully blocking EPA's illegal delay of rules to reduce climate-warming methane leaks from oil and gas facilities.

When the Administration illegally attempted to roll back restrictions on the use of hydrofluorocarbons, a super polluting greenhouse gas, we sued, and won.

## HEALTHY AIR

We have filed several lawsuits against EPA for its complete failure to protect our residents from harmful ozone pollution. Despite courts ruling against EPA, EPA continued to refuse to do its job. When EPA allowed pollution from high-ozone pollution areas to affect other regions we sued, again, and in 2020, a federal court judge gave EPA a deadline to step up and meet its obligations.

## CLEAN WATER

In 2018, EPA tried to suspend the Clean Water Rule, which protects streams and wetlands from pollution. The courts agreed with us that EPA's delay was unlawful. EPA then tried to tell the Supreme Court that groundwater pollution and other pollution that indirectly contaminates our waterways is not illegal under the Clean Water Act. We filed a brief to protect our water resources, and we won.

## AFFORDABLE CLEAN ENERGY

In 2017, we led a coalition of states in calling upon the Federal Energy Regulatory Commission to deny the Trump Administration's plan to subsidize old and polluting power plants. The Commission agreed with us and rejected the ill-conceived plan.

## PREVENTING CHEMICAL SPILLS & EXPLOSIONS

Communities surrounding facilities that handle or house extremely dangerous chemicals are more likely to be low-income and communities of color. When EPA illegally delayed critical standards that protect those communities and our first responders from dangerous chemical explosions, we sued, and we won. Now, we are challenging EPA's attempt to roll back those standards in federal court.

## PROPER MANAGEMENT OF PESTICIDES & TOXICS

When EPA allowed wide use of the toxic pesticide chlorpyrifos on food consumed by infants, children, and pregnant women, we sued. The court ultimately ordered EPA to ban the use of the pesticide on food. After EPA allowed the pesticide to be sprayed on food crops again, we got right back in the ring and filed another lawsuit.

## WILDLIFE PRESERVATION

Each time the Administration has weakened protections for endangered species and migratory birds, we have fought back on behalf of Massachusetts residents and our precious wildlife. In 2020, a federal court judge sided with us and stopped the Administration from allowing corporations and individuals to kill millions of birds. And, despite the Administration's best efforts, the courts have agreed that we have a right to fight for protection of endangered species.

## COST-SAVING EFFICIENCY STANDARDS

In 2017 and 2018 we fought, and won, in court against the Department of Energy to uphold energy efficiency standards for appliances and industrial equipment, saving consumers and businesses \$12 billion.



## LAWSUITS: WHO DID WE SUE, AND WHY?

### 2017

1. U.S. Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA) emission standards for medium and heavy-duty trucks under industry attack
2. U.S. Department of Energy (DOE) delay of energy efficiency standards for ceiling fans
3. DOE rollback of energy efficiency standards for general service lamps
4. DOE failure to publish final energy efficiency standards for air conditioners, walk-in coolers and freezers, and other appliances
5. EPA suspension of regulations for methane emissions from new and modified sources in oil and gas sector
6. EPA decision to abandon ban on chlorpyrifos use on food
7. EPA ozone standards under industry attack
8. EPA delay of Chemical Disaster Rule
9. EPA delay of implementation of ozone standards
10. U.S. Department of Transportation (DOT) delay of greenhouse gas emissions measurement rule
11. EPA failure to implement ozone standards
12. EPA rejection of petition to protect areas downwind of ozone pollution sources

### 2018

13. EPA and U.S. Army Corps of Engineers (Army Corps) suspension of 2015 Clean Water Rule
14. EPA failure to limit methane emissions from existing sources in oil and gas sector
15. EPA decision to reevaluate tailpipe emission standards for light duty vehicles
16. EPA hydrofluorocarbons guidance
17. EPA emissions standards for glider trucks
18. U.S. Department of Interior (DOI) reinterpretation of Migratory Bird Treaty Act
19. National Marine Fisheries Service (NMFS) seismic testing for offshore oil and gas exploration in Atlantic Ocean

### 2019

20. EPA failure to strengthen restrictions on ozone emissions that travel across state lines
21. EPA exemption of asbestos from reporting requirements
22. NHTSA rule reducing penalties for fuel economy standards violations
23. EPA decision to continue to allow use of chlorpyrifos on food
24. EPA Affordable Clean Energy Rule to repeal and replace Clean Power Plan
25. NHTSA rule revoking California's authority to set tailpipe emissions standards
26. U.S. Fish and Wildlife Service (FWS) and NMFS rule weakening Endangered Species Act regulations
27. DOE's rollback of energy efficiency standards for many commonly-used light bulbs
28. EPA and NHTSA rules revoking authority for California to set tailpipe emissions standards
29. EPA and Army Corps rule repealing 2015 Clean Water Rule

### 2020

30. EPA rollback of Chemical Disaster Rule
31. EPA failure to take overdue action to reduce ozone pollution
32. DOE decision not to update energy efficiency standards for commonly used lightbulbs

33. DOE energy efficiency standards for commercial packaged boilers under industry attack
34. DOE rule weakening process for setting energy efficiency standards
35. EPA and Army Corps rule re-defining term “waters of the United States” under Clean Water Act
36. EPA and NHTSA rollback of federal fuel economy and tailpipe emissions standards for light-duty vehicles
37. EPA reversal of Mercury and Air Toxics (MATS) determination
38. EPA rule re-writing water quality certification regulations and state authority granted under Clean Water Act
39. EPA risk evaluation for methylene chloride
40. Pipeline and Hazardous Materials Safety Administration (PHMSA) rule allowing bulk transport of liquefied natural gas in rail tank cars
41. Council on Environmental Quality (CEQ) major revisions to National Environmental Policy Act regulation
42. DOI implementation of leasing program for oil and gas development in Arctic National Wildlife Refuge
43. EPA rollback of methane regulations for new and modified sources in oil and gas sector

## OTHER ACTIONS

### 2017

44. Letter to Congress opposing nullification of methane waste prevention rule
45. Amicus opposing EPA delay of Clean Water Rule
46. Letter urging Congress to reject proposed funding cuts to EPA
47. Letter opposing EPA intent to cease regulating methane emissions
48. Letter to Congress opposing weakened ozone rule
49. Letter opposing EPA rollback of vehicle emission standards
50. Letter to Senate leadership opposing Regulatory Accountability Act
51. Notice of intent to sue EPA for failing to establish methane emissions standards for existing sources in oil and gas sector
52. Letter opposing NMFS offshore oil and gas seismic testing
53. Comments opposing EPA rollback of regulations for methane emissions from new and modified sources in oil and gas sector
54. Comments opposing Bureau of Ocean Energy Management (BOEM) oil and gas leasing program
55. Letter opposing EPA and U.S. Department of Justice (DOJ) decision to eliminate a mitigation project from a settlement agreement
56. Letter opposing EPA’s statement about Clean Power Plan
57. Comments on NHTSA’s failure to publish fuel economy standards for cars and light-duty trucks
58. Comments opposing EPA proposed repeal of Clean Water Rule
59. Comments opposing EPA and NHTSA reconsideration of greenhouse gas emission standards for cars and light-duty trucks
60. Notice of intent to sue EPA for failing to implement ozone standards
61. Comments to Federal Energy Regulatory Commission (FERC) on DOE proposal to subsidize coal and nuclear power plants
62. Letter and comments opposing DOI increase to national park entrance fees
63. Comments opposing DOT proposed repeal of greenhouse gas emissions measurement rule
64. Comments opposing EPA notices of data availability for rules regarding to methane emissions from new and modified sources in oil and gas sector
65. Letter to Congress opposing delaying compliance deadlines for wood heaters
66. Comments opposing EPA proposed suspension of Clean Water Rule
67. Follow-up letter to Congress opposing cuts to EPA funding
68. Briefs requesting ruling on Clean Power Plan



- 69. Briefs requesting ruling on carbon pollution standards for new and modified power plants
- 70. Brief opposing stay of case regarding methane emissions from oil and gas sector
- 71. Brief opposing stay of MATS case
- 72. Administrative objections to EPA abandoning chlorpyrifos ban

## 2018

- 73. Comments opposing EPA revision to emissions standards for glider trucks
- 74. Letter opposing EPA proposed repeal of Clean Power Plan and requesting EPA Administrator Scott Pruitt's recusal
- 75. Amicus supporting lawsuit challenging EPA postponement of a stormwater permit
- 76. Letter opposing BOEM weakening of offshore drilling safety rules
- 77. Amicus opposing EPA and DOJ decision to eliminate a mitigation project from a settlement agreement
- 78. Letter opposing DOI proposed offshore drilling plans
- 79. Amicus opposing motion for preliminary injunction in Clean Water Rule case
- 80. Comments on EPA rulemaking process for repeal of Clean Power Plan
- 81. Comments (MA-specific) opposing BOEM and DOI intent to open up the Atlantic to offshore drilling
- 82. Comments opposing BOEM and DOI proposal to open up the Atlantic to offshore drilling
- 83. Comments (MA-specific) opposing BOEM and DOI proposal to open up the Atlantic to offshore drilling
- 84. Comments on risks that neonicotinoids pose and urging EPA to restrict use
- 85. Comments opposing EPA proposed Clean Power Plan repeal
- 86. Comments on EPA Administrator Scott Pruitt's statements on Clean Power Plan
- 87. Comments opposing NHTSA proposed rollback of penalties for fuel economy standards violations
- 88. Letter opposing industry request to DOE to support failing coal and nuclear power plants
- 89. Comments on EPA statements regarding Clean Water Rule
- 90. Amicus opposing preliminary injunction in Clean Water Rule case
- 91. Letter to National Academy of Sciences regarding EPA proposal limiting types of data and research used in decisionmaking
- 92. Amicus opposing EPA's Scientific Advisory Committee directive
- 93. Comments opposing EPA suspension of glider truck rule
- 94. Comments on FERC natural gas pipeline certification policy
- 95. Amicus supporting EPA authority to regulate hydrofluorocarbons
- 96. Announcement of intention to challenge EPA's rollback of tailpipe emissions standards
- 97. Comments on EPA risk evaluation of asbestos
- 98. Amicus opposing EPA Scientific Advisory Committee directive
- 99. Comments opposing rollback of offshore drilling safety rule
- 100. Comments opposing EPA use of cost-benefit evaluation
- 101. Comments opposing EPA and Army Corps of Engineers proposal to repeal Clean Water Rule
- 102. Comments opposing EPA proposal limiting types of data and research used in decisionmaking
- 103. Comments opposing CEQ proposed rollback of National Environmental Policy Act procedures
- 104. Comments on EPA weakening of Chemical Disaster Rule
- 105. FOIA request to EPA regarding cost-benefit analyses of Clean Power Plan
- 106. Amicus opposing EPA's Scientific Advisory Committee directive
- 107. Letter to Congress opposing cuts to EPA funding
- 108. Comments opposing FWS and NMFS proposal weakening Endangered Species Act regulations
- 109. Notice of intent to sue FWS and NMFS for rule weakening Endangered Species Act regulations
- 110. Comments opposing EPA and NHTSA rollback of vehicle emission limits
- 111. Comments on DOI revisions to natural resource damages assessments

- 112. Comments opposing EPA Affordable Clean Energy Rule
- 113. Comments opposing EPA rollback of hydrofluorocarbons rules
- 114. Amicus opposing DOI reductions of national monuments
- 115. Amicus opposing FERC pipeline review policy
- 116. Letter urging EPA to withdraw proposals to weaken emissions standards
- 117. Amicus opposing EPA mercury reporting rule
- 118. Comments opposing EPA revisions to methane emissions rule
- 119. Comments opposing EPA rollback of vehicle emissions standards and Clean Power Plan in light of National Climate Assessment

## 2019

- 120. Comments on EPA wood heater rule
- 121. Rulemaking petition for EPA to review their asbestos rule
- 122. Amicus opposing EPA reversal of implementation of ozone standards
- 123. Comments opposing EPA rollback of wood boilers emission standards
- 124. Comments opposing challenge to DOE furnace standards
- 125. Comments on DOI oil and gas leasing plan proposed for Arctic National Wildlife Refuge
- 126. Comments opposing EPA replacement of power plant emissions standards
- 127. Letter requesting additional EPA MATS hearings
- 128. Amicus supporting Maine city ordinance prohibiting loading of crude oil
- 129. Comments opposing EPA and Army Corps re-definition of "waters of the United States" under Clean Water Act
- 130. Comments on EPA MATS determination
- 131. Comments opposing National Oceanic and Atmospheric Administration changes to Coastal Zone Management Act regulations
- 132. Letter to Army Corps opposing limits on state authority granted under Clean Water Act
- 133. Comments opposing DOE energy efficiency standards for general service lamps
- 134. Comments opposing DOE revision to process for setting energy efficiency standards
- 135. FOIA request for communications about MATS standards between EPA and industry representatives
- 136. Comments opposing Army Corps limits on state authority granted under Clean Water Act
- 137. Letter to Congress supporting law to ban asbestos
- 138. Amicus supporting Clean Water Act jurisdiction over pollution
- 139. Comments on EPA and NHTSA rollback of vehicle emissions standards
- 140. Letter to Army Corps opposing limit to state authority granted under Clean Water Act
- 141. Letter to Congress supporting provisions of PFAS bills
- 142. Amicus opposing EPA's Scientific Advisory Committee directive
- 143. Comments opposing DOE test procedure waivers
- 144. Comments opposing industry request to withdraw EPA endangerment finding for greenhouse gas emissions
- 145. Comments opposing EPA proposed endangered species risk assessment method
- 146. Comments opposing EPA proposal to weaken Chemical Disaster Rule
- 147. Amicus opposing EPA's Scientific Advisory Committee directive
- 148. Comments on CEQ proposal to weaken National Environmental Policy Act regulations
- 149. Comments challenging DOE energy efficiency standards for gas furnaces and water heaters
- 150. Comments opposing EPA repeal of "Once In, Always In" air permit policy
- 151. Comments opposing EPA rule changing air emissions accounting
- 152. Comments opposing DOE dishwasher energy efficiency standards exemption
- 153. Amicus opposing EPA's Scientific Advisory Committee directive



154. Letter to Army Corps opposing limit to state authority granted under Clean Water Act
155. Amicus opposing EPA methylene chloride rule
156. Comments opposing EPA proposal to weaken Chemical Disaster Rule
157. Letter to FERC urging respect for state actions on climate change
158. Comments on DOE failure to implement lightbulb standards
159. Comments opposing EPA repeal of methane emissions rule
160. Comments opposing FERC proposal to revise rules implementing Public Utility Regulatory Policies Act of 1978
161. Comments opposing U.S. Forest Service rule allowing roadbuilding and logging in Tongass National Forest
162. Notice of intent to sue EPA for failing to publish cross-state ozone pollution restrictions
163. Comments on EPA methylene chloride rule

## 2020

164. Comments opposing PHMSA proposal to allow bulk transport of liquefied natural gas in rail tank cars
165. Amicus opposing FERC policy insulating natural gas pipeline approvals from judicial review
166. Comments on DOI oil and gas leasing plan proposed for the Arctic National Wildlife Refuge
167. Amicus supporting National Park Service's jurisdiction over the Appalachian Trail
168. Comments on EPA listing certain PFAS on Toxics Release Inventory
169. Comments opposing EPA ethylene oxide rule
170. Letter to Congress supporting law to ban asbestos
171. Comments opposing EPA rollback of Chemical Disaster Rule
172. Amicus defending state authority to coordinate cap-and-trade markets for carbon emissions
173. Comments on CEQ proposal to weaken the National Environmental Policy Act regulations
174. Comments opposing FWS proposed rule weakening the Migratory Bird Treaty Act
175. Letter to National Academy of Sciences regarding EPA's Scientific Advisory Committee directive
176. Notice of intent to sue EPA for rollback of tailpipe emissions standards
177. Submitted testimony in support of legislation regulating hydrofluorocarbons
178. Letter opposing EPA COVID-19 enforcement discretion policy
179. Comments on EPA long-chain PFAS rule
180. Comments opposing U.S. Department of Agriculture weakened nutrition standards
181. Comments on EPA neonicotinoid rules
182. Comments opposing DOE conservation program prioritization rule
183. Comments opposing EPA expanded proposal limiting types of data and research used in decisionmaking
184. Comments on DOE energy efficiency standards for general service fluorescent lamps
185. Comments on EPA risk evaluation for asbestos
186. Comments on EPA risk evaluation for formaldehyde
187. Comments urging EPA to adopt PFAS drinking water regulations
188. Letter urging FERC to reject attempt to end net metering programs
189. Comments opposing EPA decision not to strengthen ozone standards
190. Letter opposing Administration expediting environmental reviews and permitting during COVID-19 pandemic
191. Comments opposing EPA wood heater sell-through rule
192. Comments on EPA risk evaluation for perchloroethylene
193. Comments opposing FWS proposed rule weakening the Migratory Bird Treaty Act
194. Comments on EPA neonicotinoid rules
195. Comments on BOEM Vineyard Wind environmental impact statement
196. Comments opposing EPA proposed cost benefit analysis rule

- 197. Notice of intent to sue DOE for failure to meet deadline to amend appliance standards
- 198. Amicus opposing EPA sulfoxaflozole rule
- 199. Comments opposing FWS and NMFS proposal to restrict habitat covered by Endangered Species Act
- 200. Amicus supporting Sioux tribes in challenge to construction of Dakota Access Pipeline
- 201. Comments opposing EPA decision not to strengthen ozone standards
- 202. Notice of intent to sue EPA for missing deadline to implement ozone standards
- 203. Letter to Congress supporting PFAS provisions in National Defense Authorization Act
- 204. Comments opposing FWS and NMFS proposal to restrict habitat covered by Endangered Species Act
- 205. Comments opposing DOE energy efficiency standards exempting fast-cycle clothes washers and dryers
- 206. Comments opposing EPA proposal to regulate aircraft greenhouse gas emissions



This is a publication of the Massachusetts Office of the Attorney General.

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The Environmental Protection Division of the Massachusetts Office of the Attorney General enforces environmental laws that protect our air and water, preserve our wetlands, tidelands, and public open space, require the clean-up of contaminated sites, and govern the use of pesticides and the handling and disposal of solid and hazardous waste. The Division works in conjunction with the Energy and Telecommunications Division in advocating for strong federal environmental protections and a clean energy future.