



MAURA HEALEY
ATTORNEY GENERAL

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL
ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

(617) 727-2200
(617) 727-4765 TTY
www.mass.gov/ago

October 31, 2017

Sarah Dunham
Acting Assistant Administrator for Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Request for Public Hearings on Proposed Repeal of Clean Power Plan

Dear Acting Assistant Administrator Dunham:

On behalf of the Commonwealth of Massachusetts, we are writing to request that EPA hold public hearings in our state on the agency's proposed repeal of the Clean Power Plan, 82 Fed. Reg. 48,035 (Oct. 16, 2017). Because addressing climate change and developing the clean energy economy are issues of immense importance to Massachusetts residents and the state's economy, we request that, in addition to a single public hearing in Washington, D.C., EPA also hold multiple hearings in Massachusetts to enable our residents, businesses, public leaders, and power generators to share their views on this decision.

In recent years, the harmful impacts of climate change in Massachusetts have been unmistakable. Average temperatures have warmed by over 2 degrees Fahrenheit since 1895, almost twice as much as the rest of the contiguous 48 states. These rising temperatures will increase the number, intensity, and duration of heat waves and lead to poorer air quality through increases in ground level ozone, which impairs lung function and can result in increased hospital admissions and emergency room visits for people suffering from asthma, particularly children. This is especially concerning to our residents as the Commonwealth already has among the nation's highest incidence of asthma—among Massachusetts children in kindergarten to eighth grade, more than 12 percent suffer from pediatric asthma, and 12 percent of Massachusetts's adult population suffers from asthma.

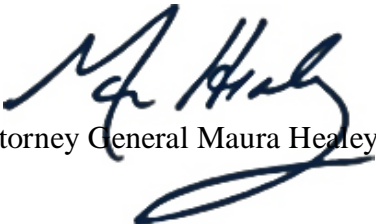
The Commonwealth is especially vulnerable to sea level rise caused by climate change because roughly 75 percent of Massachusetts' residents live near the coast. Sea level rise from climate change is already exacerbating coastal flooding and erosion from storm events and will eventually inundate low-lying communities, including Boston. According to the National Climate Assessment, in Boston alone, cumulative damage to buildings, building contents, and associated emergency costs could potentially be as high as \$94 billion between 2000 and 2100, depending on the sea level rise scenario and which adaptive actions are taken. Increased sea level, combined with increased erosion rates, also imperils our barrier beach and dune systems,

putting at risk extensive areas of coastline from Buzzards Bay to Plum Island as well as large areas of critical coastal and estuarine habitat, including the North Shore's Great Marsh—the largest continuous stretch of salt marsh in New England.


Due to the urgent need to take action to face these threats to the health of our residents and our natural resources, we have taken steps to shift away from reliance on fossil fuels for electricity generation, transportation, and in other sectors of our economy. Massachusetts has adopted a broad portfolio of laws and regulations to reduce economy-wide greenhouse gas emissions by 25 percent below 1990 levels by 2020 and 80 percent below 1990 levels by 2050, including the Global Warming Solutions Act (2008), the Green Communities Act (2008), the Act to Promote Energy Diversity (2016), the Regional Greenhouse Gas Initiative, and programs to promote low and zero-emission vehicles, among others. We have also joined together with other states and cities to advocate for and defend policies to reduce greenhouse gas emissions, such as the Clean Power Plan. In the process, we have developed a thriving clean energy sector in Massachusetts, which has created tens of thousands of new jobs. A decision to repeal the rule puts those investments at risk.

Because repealing the Clean Power Plan—especially without a commitment to replace it with any equivalent rule to deal with the urgent problem of power plant carbon pollution—would be a grave mistake, we urge EPA to take the time to listen to the people of the Commonwealth. We would be happy to assist you in arranging details for these hearings.

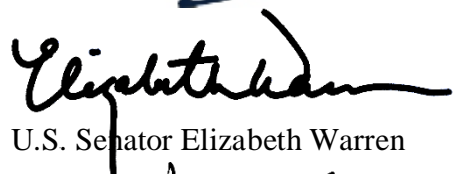
Very Truly Yours,




Attorney General Maura Healey



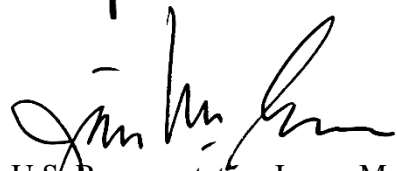
U.S. Senator Edward Markey



U.S. Senator Elizabeth Warren




U.S. Representative Richard Neal
1st District



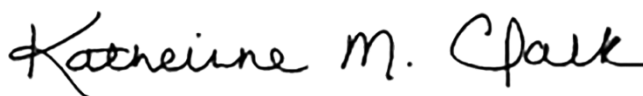
U.S. Representative James McGovern
2nd District



U.S. Representative Niki Tsongas
3rd District



U.S. Representative Joseph Kennedy III
4th District



U.S. Representative Katherine Clark
5th District



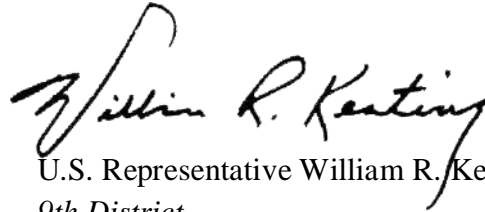
U.S. Representative Seth Moulton
6th District



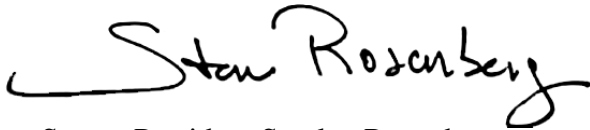
U.S. Representative Michael Capuano
7th District



U.S. Representative Stephen Lynch
8th District



U.S. Representative William R. Keating
9th District



Senate President Stanley Rosenberg
Franklin, Hampshire and Worcester



House Speaker Robert DeLeo
Nineteenth Suffolk District

cc: Deborah Szaro, Acting Regional Administrator, Region 1 (by email at szaro.deb@epa.gov)
Peter Tsirigotis, Director, Sector Policies and Programs (by email at airaction@epa.gov)