



**APR 25 2014**

**Hon. Bob Dixson, Chairman**  
Greensburg, Kansas

**Hon. Ralph Becker**  
Salt Lake City, Utah  
**Hon. Alvin Brown**  
Jacksonville, Florida  
**Hon. Salud Carbajal**  
Santa Barbara, California  
**Hon. Cindy Circo**  
St. Louis, Missouri  
**Hon. Robert Cope**  
Salmon, Idaho  
**Hon. Johnny DuPree**  
Hattiesburg, Mississippi  
**Hon. Jill Duson**  
Portland, Maine  
**Hon. Bill Finch**  
Bridgeport, Connecticut  
**Hon. Jay Fiset**  
Arlington, Virginia  
**Hon. Karen Freeman-Wilson**  
Gary, Indiana  
**Dr. Hector Gonzalez**  
Laredo, Texas  
**Hon. Manna Jo Greene**  
Cottkill, New York  
**Ms. Susan Hann**  
Palm Bay, Florida  
**Hon. Tom Hickner**  
Bay County, Michigan  
**Hon. Elizabeth Kautz**  
Burnsville, Minnesota  
**Hon. Don Larson**  
Brookings, South Dakota  
**Hon. Kara Miller**  
Smith River Rancheria, California  
**Hon. Jeff Morris**  
Anacortes, Washington  
**Hon. Marilyn Murrell**  
Arcadia, Oklahoma  
**Hon. Ken Miyagishima**  
Las Cruces, New Mexico  
**Hon. Adam Ortiz**  
Edmonston, Maryland  
**Hon. Carolyn Peterson**  
Ithaca, New York  
**Hon. Dave Richins**  
Mesa, Arizona  
**Mr. Kevin Shafer**  
Milwaukee, Wisconsin  
**Hon. David J. Somers**  
Snohomish County, Washington  
**Mr. Jeffrey Tiberi**  
Helena, Montana  
**Hon. Lisa A. Wong**  
Fitchburg, Massachusetts

**Frances Eargle, DFO**

The Honorable Gina McCarthy  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

Dear Administrator McCarthy:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to work with you and the U.S. Environmental Protection Agency on a wide variety of issues of interest and concern to local governments. As stated in our December 18, 2013 letter to you, the LGAC stands ready to assist and support EPA in its work implementing the President's Climate Action Plan.

The LGAC supports EPA's September 20, 2013 proposal under Section 111(b) of the Clean Air Act to create the first uniform national limits on the amount of carbon pollution that future power plants will be allowed to emit. A national regulatory framework is essential in achieving a reduction in greenhouse gas emissions. A rising number of health effects as a result of greenhouse gas pollution threatens the American public's health and welfare, as documented in EPA's 2009 Endangerment Finding. Power plants are the largest stationary sources of carbon pollution and contribute about one-third of all greenhouse gas pollution in the U.S.

This proposal is in line with investments in clean energy technology that are already being made in the power sector and ensures that the U.S. will continue to rely on an "all of the above" energy strategy, including natural gas, coal, and renewable energy. Along with EPA's recently revised Mercury and Air Toxics new source emission standards and new source performance standards for criteria pollutants, this proposal will allow producers to implement integrated, efficient compliance strategies that protect the health of our population.

Establishing separate standards for fossil fuel-fired electric steam generating units and natural gas-fired stationary combustion turbines is an important component of the proposal by recognizing that a one-size-fits-all solution does not work. We urge EPA to be

mindful of the importance of providing flexibility in the proposed standards to ensure that our nation will have continuous reliable, affordable, and clean power that takes advantage of modern technologies. Additionally, we urge EPA to consider a complete economic analysis that includes the costs associated with health impacts and environmental damages that would occur if no action were taken by EPA. We encourage EPA to include in the rule a crediting mechanism for energy recovery processes undertaken by local utilities.

Local governments alone cannot bear the entire burden of limiting greenhouse gas emissions and protecting the health of our people. The LGAC concurs with the EPA's proposed carbon dioxide limits for new fossil fuel-fired utility boilers and integrated gasification combined cycle units, as well as single-cycle turbines for ancillary power, and the proposed limits for natural gas-fired stationary combustion turbines.

The LGAC appreciates the opportunity to provide comments, and we look forward to our partnership with the EPA as we work to decrease carbon pollution and protect the health of the American people.

Sincerely,



Mayor Bob Dixon  
Chair, LGAC



Supervisor Salud Carbajal  
Chair, Air, Climate & Energy Workgroup