

September 26, 2018

Acting Administrator Andrew Wheeler
U.S. Environmental Protection Agency
Docket ID No. EPA-HQ-OAR-2017-0355
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Subject: Proposed ACE Rule

Dear Acting Administrator Wheeler,

Thank you for providing an opportunity to comment on the proposed Affordable Clean Energy (ACE) Rule. On behalf of the Metropolitan Washington Council of Governments' (COG) Metropolitan Washington Air Quality Committee (MWAQC) and Climate, Energy and Environment Policy Committee (CEEPC) we believe that the ACE rule does not go far enough to support our regional climate goals or to sufficiently protect our region's air quality and natural resources upon which we depend.

COG is the council of governments serving local governments across metropolitan Washington, addressing a broad range of environmental, transportation, public safety, and community planning issues. MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop plans demonstrating attainment and maintenance of federal ozone and other criteria pollutant standards for the Washington, DC-MD-VA non-attainment area. CEEPC serves as a principal policy adviser on climate change, including development of a regional climate change strategy to meet the regional GHG reduction goals adopted by COG.

We are concerned that the ACE rule will not result in reduced air pollution and GHG emissions necessary for our region to attain compliance with ozone National Ambient Air Quality Standards (NAAQS) and does not achieve the needed balance between energy security with environmental protections.

State and local governments across metropolitan Washington have taken numerous actions to reduce GHG and other air emissions from activities in the region, such as the implementation of building energy efficiency programs, widespread deployment of solar energy systems, and the adoption of electric vehicle fleets and associated infrastructure. These actions have resulted in significant reductions of CO₂ and other air pollutants; however, the region also relies on federal emissions control programs for additional reductions to meet air quality NAAQS and GHG reduction goals. This includes the regional GHG reduction goal of 20% below 2005 levels by 2020. As of 2015, the region is halfway to this goal, an impressive feat considering growth in population, but there is still a lot of work to do to further decrease GHG emissions. Federal emissions control programs contribute up to a third of the GHG emissions reductions projected for the region and are therefore critical to meeting our goals.

The EPA set National Ambient Air Quality Standards for a wide variety of air pollutants that DC, MD, and VA have worked for over 20 years to achieve. Burning fossil fuels not only result in greater amounts of GHG emissions, but also increased emissions of pollutants such as ozone precursors and fine particle precursors, particularly in the upwind areas that contribute to air pollution in our region. These pollutants have negative impacts on public health and welfare. There is also concern about the impacts of additional pollutants associated with fossil fuel-burning Electric Generating Units, such as arsenic, mercury and lead.

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Federal government leadership in delivering effective regulatory limits on emissions from power plants, including measures to reduce demand and increase renewable energy production, is a critical component of the region's ability to meet mandated environmental objectives. The ACE rule should be revised to ensure pollution levels are further reduced both in metropolitan Washington and in upwind areas.

We urge the EPA to reconsider the ACE rule and to resolutely act against the harmful impacts of GHG emissions and other air pollutants.

Sincerely,

The Honorable Hans Riemer
Chair, Metropolitan Washington Air Quality Committee

The Honorable Mary Lehman
Chair, Climate Energy and Environment Policy Committee