



July 8, 2019

Andrew Gottlieb  
Executive Director

The Honorable Maura Healey  
Attorney General  
20th Floor  
1 Ashburton Place  
Boston, MA 02108

BOARD OF DIRECTORS

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**RE: The Trump Administration’s American Clean Energy (ACE) Rule**

Bob Ciolek  
Treasurer

Dear Attorney General Healey:

Maureen O’Shea  
Clerk

The Association to Preserve Cape Cod (APCC) writes to respectfully urge you to use all the resources of your office to vigorously oppose the U.S. Environmental Protection Agency’s repeal of the Clean Power Plan (CPP) and its replacement with the Affordable Clean Energy (ACE) rule.

Michael Corrigan

DeeDee Holt

Established in 1968, APCC is the Cape Cod region’s leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect and enhance Cape Cod’s natural resources and quality of life. With ever-increasing urgency, much of APCC’s efforts in recent years have been focused on the need to address climate change and its impacts on Cape Cod. As you know, climate change has emerged as the greatest threat facing the Commonwealth’s natural resources, economy and human population. Cape Cod communities are especially vulnerable and are already experiencing worsening impacts from sea level rise, coastal erosion and an increase in frequency and severity of coastal storms associated with a changing climate.

Thomas Huettner

Pat Hughes

Cheryl Lubin

Elysse Magnotto-Cleary

Blue Magruder

Eliza McClennen

Stephen Mealy

Electrical power plants fired by fossil fuels are responsible for 31 percent of the greenhouse gas emissions in the U.S.—the single largest source of greenhouse gas pollution in the nation. Issuance of the CPP by the EPA in 2015, with its requirement for significant reductions in carbon dioxide pollution emissions from power plants, has been the most important step taken by the U.S. to address climate change.

Maureen O’Shea

Kris Ramsay

Robert Summersgill

Continuation of the CPP rule would set our nation on the right track toward mitigating climate change and its impacts. Unfortunately, repealing the CPP and replacing it with the ACE rule reverses that forward progress.

Taryn Wilson

The EPA policy decisions that led to the ACE rule and its abandonment of efforts to reduce carbon emissions will adversely affect Massachusetts’ environment and the welfare of its citizens as the impacts of our climate crisis increase. However, the ACE rule also endangers the health and safety of Massachusetts citizens by allowing an

increase in other harmful pollutant emissions. In 2015, the EPA, looking to protect the public health, concluded that the CPP would prevent 1,500 to 3,600 premature deaths, 90,000 asthma attacks in children, up to 1,700 heart attacks, 1,700 hospital admissions and 300,000 missed workdays each year due to reductions in particulate pollution. In contrast, the EPA's own regulatory analysis estimates their new proposed ACE rule would kill an additional 300 to 1,500 people each year by 2030 because of continued coal-fired power plant emissions. Despite the leading role Massachusetts has taken in promoting renewable energy production to reduce our reliance on fossil fuels and to also clean our air, the residents of the Commonwealth are still at risk from these coal-fired plant emissions in upwind states.

The EPA has a legal obligation to protect the nation's environment and the health of its citizens, a responsibility entrusted to the agency since its establishment in 1970 and reaffirmed under the Clean Air Act. Yet perversely, the underlying intent of the EPA's ACE rule is to prop up the coal industry by extending the life of dirty coal-fired plants at the expense of the environment and public health. This is completely unacceptable.

In these unusual times when we can no longer rely on federal agencies to protect the environment and public health and safety, we must rely on our state Attorney General to take action to prevent the promulgation of federal agency rules that will increase pollution, exacerbate our climate crisis, and impact the environment and health of the citizens of Massachusetts. On behalf of our 3,000 members, APCC respectfully requests that you protect the welfare of our Commonwealth's citizens and natural resources by moving to oppose the ACE rule.

Sincerely,



Andrew Gottlieb  
Executive Director

cc: Senator Elizabeth Warren  
Senator Edward Markey  
Representative William Keating  
Governor Charlie Baker  
Lieutenant Governor Karyn Polito  
EEA Secretary Kathleen Theoharides  
DEP Commissioner Martin Suuberg