Statement of the National Tribal Air Association Regarding the Final Clean Power Plan Published by the US Environmental Protection Agency on August 3, 2015

The US Environmental Protection Agency (EPA) on Monday this week issued a *final* rule addressing carbon pollution standards for new, modified, and reconstructed electric utility generating units (EGUs). In the rule, the Agency proposed a federal plan and model rule to assist states in implementing the Clean Power Plan.

On October 15, 2014, the National Tribal Air Association (NTAA) provided the EPA with comments on the draft version of this rule. In its comment letter, the NTAA voiced overall support of the Clean Power Plan and other federal efforts to regulate emissions of greenhouse gases. NTAA also strongly urged the EPA to pursue aggressive carbon dioxide regulations and ambitious, yet achievable target dates for compliance.

NTAA's Executive Committee, staff and Policy Advisory Committee are reviewing the final rule and will respond to EPA in the coming weeks. NTAA will also be providing Tribes with a Policy Response Kit in the coming weeks to help Tribes better understand how the Clean Power Plan will impact Tribal communities.

NTAA Supports the Regulation of Greenhouse Gases

"Indigenous peoples experience climate change impacts disproportionately as compared to the general population, therefore we enthusiastically applaud the EPA's efforts at regulating climate-changing pollutants, including carbon dioxide. Our policy staff is in the process of conducting a thorough assessment of the rule to evaluate the impacts and implications of the final rule on Tribal communities. The NTAA hopes that this rule is the first in a series of greenhouse gas regulations that will help to mitigate emissions of greenhouse gases, both for the immediate benefit of our communities, as well as for future generations."

- NTAA Chairman, Bill Thompson

A summary of NTAA's comments on the draft version of the Clean Power Plan:

Indian Tribes are affected much differently than the rest of the nation because their cultures are deeply integrated with the ecosystems of North America; and many Tribal economies are heavily dependent on the use of fish, wildlife, and native plants. Even where Tribal economies are integrated into the national economy, Tribal cultural identities continue to be deeply rooted in the natural environment. As climate change disrupts biological communities, the survival of some Tribes as distinct cultures may be at risk. The loss of traditional cultural practices, due to climate-driven die-off or range shift of culturally significant plant and animal species, may prove to be too much for some Tribal cultures to withstand on top of other external pressures that they face.

EPA published findings contained in the draft rule, published June 18, 2014:

- Fossil fuel-fired power plants are by far the largest source of U.S. CO₂ emissions, making up 32% of U.S. total greenhouse gas emissions
- The transition to cleaner sources of energy will better protect Americans from other harmful air pollution. By 2030 the following pollutants from EGUs would decrease markedly:
 - o Sulfur dioxide would be reduced by 90% compared to 2005 levels
 - o Nitrogen oxides would be 72% lower

- The historically low levels of these pollutants mean that we would avoid thousands of premature deaths and have thousands fewer asthma attacks and hospitalizations in 2030 and every year beyond
- Proposed pollution reductions outlined in the Clean Power Plan would result in important benefits, including:
 - o Climate benefits of \$20 billion
 - o Health benefits of \$14-\$34 billion
 - Net benefits of \$26-\$45 billion
- Carbon-based emissions reductions outlined in the Clean Power Plan would serve to protect public health, and prevent (annually):
 - o 3,600 premature deaths
 - o 1,700 heart attacks
 - o 90,000 asthma attacks
 - o 300,000 missed work days and school days

More Information to Come

EPA has hosted multiple events in the days leading up to and immediately following the release of the final rule. Moving forward, EPA has said that it will provide additional information to facilitate engagement between communities, including Tribal communities, and states as implementation of the Clean Power Plan. Guidance from EPA will include strategies that states can use to meaningfully engage with communities, along with other resources and information, all housed on a portal web page that the agency will develop for use by communities. Finally, NTAA will be providing more analysis of the final Clean Power Plan in a Policy Response Kit for Tribes in the coming weeks.

A complete copy of the rule can be found here: Carbon Pollution Emission Guidelines for Existing Stationary http://www.epa.gov/airquality/cpp/cpp-final-rule.pdf

Check back in the coming weeks to find NTAA's Policy Response Kit on NTAA's webpage, here: http://www7.nau.edu/itep/main/ntaa/PolicyResponseKits/PolicyResponseKitsHome/