

The Honorable Michael Regan, EPA Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460  
April 21 2023

**Re: EPA must accelerate its efforts to cut climate pollution from the power sector**

Dear Administrator Regan,

As local organizations committed to ensuring Michigan addresses climate change and equitably slashes climate pollution across its economy and power sector, we write to urge the Biden administration and EPA to accelerate their efforts to clean up the nation's power sector. With robust carbon pollution standards for new and existing power plants, we can bolster our state's economy and improve public health.

In Michigan, power generation is the sector that produces the largest amount of climate pollution (29% of the state's total emissions). The state's top ten power plants alone emit [38.9 million metric tons](#), which is equivalent to the annual emissions of 8.4 million gas-powered cars.

Cleaning up the power sector is critical if the state is going to successfully implement the MI Healthy Climate Plan—Governor Whitmer's economy-wide plan to cut emissions, create jobs, and improve health. [Recent analysis shows](#) that carrying out the state's climate plan would create over 64,000 new manufacturing jobs, prevent over 200 deaths and over 3,000 asthma attacks, and facilitate at least a 2 percent increase in the state's GDP.

Our state will not achieve its climate goals without cutting pollution from the power sector significantly and urgently. While Michigan has [cut power sector carbon pollution 14% since 2005](#), it must reduce the sector's carbon pollution by at least 80% by 2030 to hit its targets.

Cutting power sector pollution would also create needed benefits for public health. Deadly air pollutants like soot, smog, and mercury from the power sector are key drivers of environmental injustice, especially in Michigan. Southwest [Detroit residents](#) have for too long suffered the injustice and health consequences of living in one of the most polluted zipcodes in the country, a direct result of unchecked pollution from power plants and manufacturing facilities powered by dirty energy.

Federal safeguards to reduce pollution from power plants will help us take steps to undo decades of environmental injustice. They will give communities more opportunities to be powered by cleaner energy, and help us deliver on a more equitable, resilient future.

These federal rules are not sufficient, however, and must be paired with other actions that phase down fossil fuels and protect communities from the pollution and harm that fossil fuels create.

**With clean power standards, the Biden administration can set Michigan and other states up for a healthier, more resilient future.**

The U.S. took an important step on clean energy in 2022, when Congress and President Biden enacted the Inflation Reduction Act (IRA), which includes incentives to ensure clean energy is nearly always the cheapest source of energy. However, according to [new modeling](#) and the recent IPCC report that emphasizes we cannot afford anymore fossil fuel development and subsequent pollution, it is clear the administration must take further action to meet its own clean energy and climate goals this decade.

The IRA's investments are projected to increase carbon-free electricity in the U.S. from approximately 40% in 2022 to 66% clean power by 2030. This falls short of the levels required to achieve U.S. climate targets, including 80% clean power by 2030 and 100% by 2035.

To close the gaps between U.S. climate and clean power targets and our current trajectory, and to further advance President Biden's critical climate and environmental justice commitments, we urge EPA to take decisive action to cut pollution and advance clean electricity in the power sector over the next two years, including:

- **Set ambitious carbon pollution standards** for new and existing power plants under sections 111(b) and 111(d) of the Clean Air Act. By pairing the IRA with strong EPA carbon standards for power plants, the Biden administration could cut power sector carbon pollution to [77 percent below 2005 levels and achieve a 76 percent clean electrical grid](#) by the end of this decade.
- **Set additional EPA pollution standards** that reduce conventional air and water pollutants and improve public health. EPA has long-standing legal authority to regulate sources of air, water, and other pollution under key environmental laws, including the Clean Air Act, the Clean Water Act, and the Resource Conservation and Recovery Act.
- **Implement the Inflation Reduction Act effectively, efficiently, and equitably.** IRA climate and clean energy provisions can bring down power sector carbon emissions to [66 percent below 2005 levels by 2030](#). But these reductions will only be realized if EPA implements the programs effectively and efficiently, with timely federal guidance on tax credits and grant programs and the distribution of funds in a way that maximizes carbon reductions and transitions to clean energy sources.

**Further and faster**

EPA is [falling behind schedule](#) on seven out of ten critical power sector pollution rules. Without further concerted effort, the agency risks leaving this crucial business undone at the end of the first term. Issuing final rules in the months before the 2024 election also leaves them open to possible repeal by the [Congressional Review Act](#), meaning EPA could not issue any rule “substantially the same” without new legislation.

As Michiganders committed to a healthier, more resilient future, we urge EPA to move quickly to prevent more pollution from the power sector that disproportionately harms low-income, Black, and Brown communities. We must accelerate the clean up of power sector pollution and ensure critical clean air and water standards are not left vulnerable to the Congressional Review Act.

Thank you in advance for your consideration of our recommendations. We look forward to continuing to work with your agency on advancing bold climate action in our state and beyond.

Sincerely,

Michigan Environmental Council

A2D2-Ann Arbor inDivisible for Democracy

Wolfpack

The Inovo Group

King Orchards

Voices for Carbon Neutrality at University of Michigan

Savage New Media, LLC

Dr. Lawrence Hennessey, MD



Asthma and Allergy  
Foundation of America®  

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MICHIGAN CHAPTER



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ENVIRONMENTAL  
LAW CENTER**

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**MiCCA**

*Michigan Clinicians for Climate Action*

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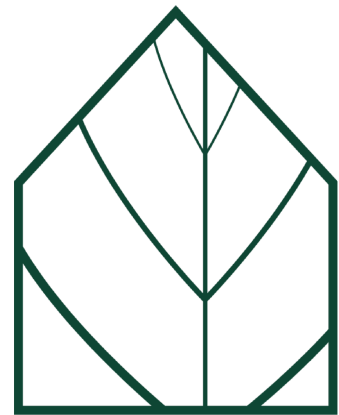


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CONSERVATION  
VOTERS**



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**FLOW**  
FOR LOVE OF WATER



**VOLTA**  
**HOMES**