

To strengthen  
and promote  
cities as centers  
of opportunity,  
leadership, and  
governance.



**National League  
of Cities**

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Donald J. Borut

November 26, 2008

The Honorable Stephen L. Johnson  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Dear Administrator Johnson:

On behalf of the 19,000 cities and towns represented by the National League of Cities (NLC), we appreciate the opportunity to respond to the Agency's Advance Notice of Proposed Rulemaking on Regulating Greenhouse Gas Emissions under the Clean Air Act. Clean air is essential to the health of citizens and the welfare of our communities.

As you consider an overall approach for potentially addressing greenhouse gas emissions under the Clean Air Act, NLC urges the federal government to coordinate air quality regulations with local governments as well as federal agencies. A coordinated approach across all federal agencies regulating air quality is essential to avoid conflicting regulations.

NLC calls for a national strategy for addressing greenhouse gas emissions that protects human health from the harmful effects of air emissions and targets the sources responsible for current air emissions.

A national strategy must recognize regional problems and emphasize regional solutions, while also emphasizing air shed solutions to problems from the transport of air pollution across political boundaries. Therefore, a national strategy should support local government efforts to partner with other local governments as a means of improving air quality on a regional scale. Additionally, authority to conduct air quality planning should be vested with general-purpose local governments and/or regional policy making organizations. State and local governments should continue to have the authority to establish stricter standards than those set by the federal government.

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Reducing greenhouse gas emissions is necessary to halt the potentially irreversible effect on the global environment. NLC believes that a multi-pollutant strategy to reduce emissions from power plants, mobile sources and other major sources will provide significant reductions in greenhouse gas emissions that cause climate change. NLC supports this approach because it is flexible, predictable and market-based.

The federal government, however, should continue to assess the potential economic and environmental consequences of proposed policies to reduce greenhouse gas emissions and ensure that the nation's cities are part of that process. Care must be taken to ensure that reductions in greenhouse gas emissions are justified and fair to our local governments. This is a global problem that demands a global solution.

Thank you for consideration of NLC's policy as you develop potential rules for regulation greenhouse gas emissions under the Clean Air Act.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald J. Borut". The signature is fluid and cursive, with a large, stylized initial "D" and "B".

Donald J. Borut  
Executive Director