

December 1, 2014

Ms. Gina McCarthy  
Administrator  
Environmental Protection Agency  
EPA Docket Center (EPA/DC)  
Attention: Docket ID No. OAR–2013–0602  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OAR-2013-0602  
Comments of Audubon Arkansas, the Arkansas Public Policy Panel and the Arkansas Sierra Club on  
Proposed Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility  
Generating Units, 79 FR 34830 (June 18, 2014)

Dear Administrator McCarthy:

The attached comments document is submitted jointly on behalf of the Arkansas Stakeholder Organizations: Audubon Arkansas, Arkansas Public Policy Panel and the Sierra Club, Arkansas Chapter (“Organizations”). The purpose of our comments is to provide to the Environmental Protection Agency (“EPA”) our combined input on the “Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units” proposed rule, published in the Federal Register on June 18, 2014 (“Proposed Rule”). These comments are the result of our joint efforts in evaluating the components of the Proposed Rule as they pertain to Arkansas.

The Organizations strongly support the use of EPA’s authority under the Clean Air Act to reduce carbon emissions and we commend the Agency on the development of this proposed rule. Overwhelming evidence exists on the need for reducing carbon emissions and for increasing the speed at which emission reductions are achieved. This proposal provides the necessary and concrete action to ensure that the US initiates the steps to reduce carbon emissions to the level that must happen over the coming decades.

The Proposed Rule also provides states wide latitude in developing preferred compliance pathways, reflecting requests for compliance flexibility. While our specific comments are detailed in the pages that follow, we believe Arkansas is poised for success in implementing the Proposed Rule.

We appreciate the opportunity to provide these comments and request your utmost consideration.

Sincerely,

Brett Kincaid.  
VP & Executive Director  
Audubon Arkansas

Anna Weeks  
Environmental Policy Associate  
Arkansas Public Policy Panel

Glen Hooks  
Executive Director  
Sierra Club, AR Chapter