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December 1, 2014

Gina McCarthy, Administrator
EPA Docket Center (EPA/DC),
Environmental Protection Agency
Mail Code 28221T
1200 Pennsylvania Ave. NW
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2013-0602

Re: *Delaware Comments on Proposed Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units, 79 FR 34830 (June 18, 2014)*

Dear Administrator McCarthy,

On June 18, 2014, EPA released its proposed rule for the regulation of greenhouse gases under Clean Air Act Section 111(d) and is seeking comments from the affected States and stakeholders by December 1, 2014. The Department of Natural Resources and Environmental Control (DNREC) respectfully submits these comments to the EPA.

Delaware is experiencing climate change, which is causing increased temperatures and precipitation.¹ Since 1900 the average annual temperature rose by 2°F, and average temperatures are expected to increase another 2.5 to 4.5 degrees by mid-century (2050) and by as much as 8 degrees by 2100 (late century). By 2100 average precipitation is expected to increase by about 10%. Heavy rainstorms are expected to become more frequent and more intense. Increasing temperatures may increase risk of serious illness, such as heat stroke, especially for our state's vulnerable citizens. Increased temperatures may also increase in the number of days when ground-level ozone concentrations exceed health based standards, which impacts children and the elderly and even healthy individuals. Changes in precipitation and temperature may also impact how disease spreads, including mosquito and tick borne diseases.

¹ <http://www.dnrec.delaware.gov/energy/Pages/The-Delaware-Climate-Impact-Assessment.aspx>

Climate change is also impacting Delaware by causing sea level rise.¹ As a coastal state, Delaware's economy and quality of life have historically been linked to its shores, its vast expanses of protected tidal wetlands, and its fertile farm fields. Inundation from sea level rise will occur in all three of Delaware's counties, affecting a range of resources. Because of its location, low average elevation, and dependence on the coast, Delaware is particularly vulnerable to the effects of rising sea levels including loss of low-lying land and structures, saltwater intrusion into ground and surface waters, and increased coastal flooding from storm events. Statewide, between 8% and 11% of the state's land area could be inundated by sea level rise by the year 2100.² Sea level rise is likely to affect the condition of roads and bridges and other infrastructure throughout the state, including access routes and evacuation routes to many beach communities and other low-lying areas. Although the direct impacts from sea level rise will be felt primarily in areas near tidal waters, every Delawarean is likely to be affected whether through increased costs of maintaining public infrastructure, decreased tax base, loss of recreational opportunities or loss of community character.

Because climate change is impacting Delaware's people, natural resources, infrastructure and industries, Delaware believes that strong actions to mitigate greenhouse gases are necessary to ensure a high quality of life and economic vitality for generations to come. Delaware conducted a "listening session" on November 5, 2014 to gain Delaware stakeholder input on the federal proposal. Over 50 stakeholders participated in the dialogue or submitted comments to us. The majority of responses from our stakeholders are in agreement that climate change is impacting Delaware, and they were in support of the EPA Clean Power Plan proposal.

For the above reasons Delaware supports EPA's Clean Power Plan proposal as a significant step toward reducing carbon emissions, and offers the following specific comments for the EPA to consider in developing a final rule.

- Delaware fully supports EPA's efforts to utilize its authority under section 111(d) of the Clean Air Act to reduce carbon emissions from the power section. By developing the building block framework as described in the Clean Power Plan proposal, EPA provides states with multiple strategies for demonstrating the "best system of emission reduction." Delaware is supportive of the flexibility EPA has provided by the proposal's acceptance of multi-state and mass-based programs as a means of compliance with the emission guidelines. Delaware and the RGGI states have successfully demonstrated the ability to coordinate across state agencies, work with independent system operators/regional transmission organizations as well as solicit input from stakeholders in order to reduce carbon emissions from our power plants cost effectively. We have collectively reduced

² <http://www.dnrec.delaware.gov/coastal/Pages/SLR/DelawareSLRVulnerabilityAssessment.aspx>