

## **RAQPC Draft Position on the GHG ANPR**

It is important to act as soon as possible to reduce greenhouse gas (GHG) concentrations. Aside from mitigating the climate effects of GHG emission reductions, any measures that result in GHG emission reductions are likely to have secondary effects which result in decreased concentrations of Clean Air Act (CAA) criteria pollutants such as ozone and particulate matter. Such reductions can produce direct improvements in human health, but also are likely to result in increases in efficiency which can result in cost savings as well as other economic benefits.

The CAA was designed to help control local and regional air quality problems that present direct threats to human health through actions taken by local, state, and federal agencies in order to meet federally mandated standards for control of localized pollutants. Because of the global scope of GHG emissions, the CAA may prove to be a less than ideal solution for controlling GHGs. However, controlling and ultimately reducing GHGs will undoubtedly result in reductions in health and economic hazards which are related to rising emissions.

Despite such concerns that the Clean Air Act (CAA) is not an ideal framework for dealing with GHG emissions, the risk to the economy, health, and climate of the United States from any further delay in action is dire enough that measures to decrease the emissions of GHGs must be undertaken as soon as possible. By applying the CAA to GHGs, the EPA as well as state and local agencies can make use of the already existing tools such as the New Source Performance Standards and the Best Available Control Technology standard that are currently used for the CAA criteria pollutants for GHGs. These tools, in conjunction with strengthened standards, will help to provide an interim solution which will allow agencies to quickly begin to control GHGs rather than waiting for new legislation or regulations. Once new rules have been developed which include tools specifically designed for the control of GHGs, the CAA will no longer be needed for GHGs and those provisions which apply to GHGs should be allowed to sunset.