

May 28, 2014

Dear Governor Bullock,

We, the undersigned businesses and organizations, respectfully request that you support and embrace the U.S. Environmental Protection Agency's (EPA) efforts to reduce carbon pollution from existing power plants and hasten the transition to clean energy. This EPA proposal is being developed pursuant to EPA's authority under the federal Clean Air Act §111(d) and represents the best available tool to reduce dangerous climate-changing carbon pollution in the United States and Montana. The Clean Air Act has been used successfully to limit harmful pollutants such as mercury, lead, and sulfur dioxide. It is time for EPA to use the Clean Air Act to limit carbon pollution as well.

As organizations, we represent tens of thousands of Montanans who are alarmed by the unlimited release of carbon pollution into our atmosphere, and as businesses we recognize that our long-term economic prosperity in large part depends upon a reduction in carbon pollution to avoid irreversible climate change. Montana has enormous opportunity to grow our existing industries, such as renewable energy, agriculture and tourism. However, this growth in large part depends upon addressing the climate crisis.

We thank you for your previous support of clean and renewable energy. Montana has developed low- or zero-carbon energy sources and done so at an affordable price. As a result, many clean energy jobs have been created in recent years. We are encouraged by your efforts to build on this success, and we look forward to working closely with you to improve Montana's clean energy economy.

We appreciate your recognition that human-caused climate change is already causing significant impacts in Montana. Montana and the United States need a thoughtful transition from carbon-intensive energy sources to clean energy. Montana is heating up. Wildfires are fouling our summer air and costing taxpayers hundreds of millions of dollars. Longer summers and milder winters are allowing beetles to destroy our forests. Our world-renowned streams and rivers are warming up and suffering from low water flows in late summer. These dramatic changes are harming our farmers and ranchers, our tourism economy, and our way of life.

EPA is expected to propose standards for existing power plants in June 2014, as promised in the President's Climate Action Plan. EPA administrator Gina McCarthy has repeatedly emphasized that EPA's proposal will set targets that recognize the states' different circumstances and will offer states important flexibility in implementation.

In moving forward with carbon pollution standards, states like Montana will likely be able to choose from a variety of flexible compliance options to achieve meaningful reductions in carbon. There is the potential that state programs, such as Montana's Renewable Energy Standard and energy conservation programs, may serve as compliance mechanisms for the federal requirement. If done appropriately, this flexibility will help minimize the costs associated with implementing the rule, reduce dangerous carbon pollution, spur innovation

in our clean energy sector, and maximize the economic and environmental benefits to the state of Montana.

We urge you to support and implement a Montana program that ensures significant reductions in carbon pollution from existing power plants. Such a program should bring about appreciable and measurable reductions in carbon pollution, and be crafted in such a way that pollution sources and our transition to a clean energy economy do not disproportionately impact Montana's most vulnerable communities.

As your administration moves forward and develops a program tailored to Montana, we recommend that you consider the following guiding principles:

- Ensure that energy efficiency and zero-carbon energy is a centerpiece of the program. The cheapest and cleanest energy source that Montana has is the energy that we do not use.
- Encourage investments in clean energy resources to ensure that the transition to a modern energy economy provides family-sustaining livelihoods to Montana communities that have been traditionally tied to the coal sector.
- Prepare for a strategic and deliberate phase out of traditional coal-fired power plants that do not capture and permanently sequester their carbon emissions.
- Discourage the use of carbon-intensive fuel sources, such as natural gas. While investment in natural gas may represent a short-term reduction in carbon pollution, the infrastructure requirements assures that our energy system will continue to pollute carbon for decades to come.
- Fully explore and evaluate the benefits and drawbacks in establishing regional emissions programs, which may allow for greater compliance flexibility and additional opportunity for clean energy investment.
- Ensure that the program is regularly audited and updated to assure that it is achieving measurable reductions in carbon pollution.

A majority of Montanans recognize the threat posed by human-induced climate change and would like to see a thoughtful transition to a clean energy future. Meaningful reductions in carbon pollution are absolutely essential for preserving our economy and way of life. We urge you to make climate stability part of your legacy in Montana.

Sincerely,

Businesses

AirWorks, Inc.

Bill and Diane Yarus, Owners (Kalispell, MT)

Beard Cabinets, Inc.

Leslie Beard, Owner (Kalispell, MT)

Bozeman Green Build

John Palm, Owner (Bozeman, MT)

Bridger Bowl Ski Area

Doug Wales, Director of Sales (Bozeman, MT)

Centennial Timber Frames

Mike and Sandy Koness, Owners (Kalispell, MT)

ClearSky Climate Solutions, LLC

Keegan Eisenstadt, Owner (Missoula, MT)

David Ryan Energy Consulting

David Ryan, Consultant (Butte, MT)

Detour Destinations, Inc.

Greg Findley, Owner (Bozeman, MT)

Ford Custom Homes

Len Ford, Owner (Whitefish, MT)

Harvest Solar

Brad Van Wert, Owner (Bozeman, MT)

Liquid Solar Systems

Todd Hoitsma, Owner (Bozeman, MT)

Oasis Montana, Renewable Energy Supply and Design

Chris Daum, Owner (Stevensville, MT)

Onsite Energy

Orion Thornton, Owner (Bozeman, MT)

Sage Creek Solutions

Adam Pimley (Bozeman, MT)

Sage Mountain Center

Christopher Borton, Director (Whitehall, MT)

Solar Montana

Jackson Isbell, Owner (Helena, MT)

Solar Plexus, LLC

Mary Hamilton, Member Manager (Missoula, MT)

Sundance Solar Systems

Henry Dykema, Owner (Red Lodge, MT)

Sustainable Building Systems, LLC

Dan Brandborg, General Manager (Missoula, MT)

Sweetwater Travel

Dan Vermillion, Owner (Livingston, MT)

Winpower West

Benjamin Reed, Owner (Billings, MT)

Organizations

Alternative Energy Resources Organization

Caroline Wallace, Food and Agriculture Program Manager (Helena, MT)

Bozeman Climate Alliance

Kristen Walser (Bozeman, MT)

Citizens for Clean Energy

Rich Liebert (Great Falls)

Conservation Hawks

Todd Tanner, Executive Director (Big Fork, MT)

Earthjustice

Jenny Harbine, Staff Attorney (Bozeman, MT)

ecoCheyenne

Vanessa Braided Hair (Lame Deer, MT)

Glacier Climate Action

Steve Thompson (Whitefish, MT)

Helena Climate Action

Duane Catlett (Helena, MT)

Helena Service for Peace and Justice

Francis Kromkowski, (Helena, MT)

Helgate Hunters and Anglers

Casey Hackathorn, Board President (Missoula, MT)

Jeannette Rankin Peace Center

Betsy Mulligan-Dague, Executive Director (Missoula, MT)

League of Women Voters of Montana

Nancy Detrick, President (Billings, MT)

Montanans Against Toxic Burning

Jennifer Swearingen (Bozeman, MT)

Montana Audubon

Amy Cilimburg, Director of Bird Conservation and Climate Policy (Missoula, MT)

Montana Climate Action

Greg Findley (Bozeman, MT)

Montana Conservation Voters & MCV Education Fund

Theresa Keaveny, Executive Director (Billings, MT)

Montana Elders for a Livable Tomorrow

Jan and Harold Hoem (Missoula, MT)

Montana Environmental Information Center

Anne Hedges, Deputy Director (Helena, MT)

Montana Public Interest Research Group

Bryce Bennett, Executive Director (Missoula, MT)

Montana Renewable Energy Association

Diana Maneta, Executive Director (Missoula, MT)

National Wildlife Federation

Tom France, Regional Executive Director (Missoula, MT)

NW Energy Coalition

Diego Rivas, Montana Policy Associate (Helena, MT)

Renewable Northwest

Jeff Fox, Montana Policy Manager (Bozeman, MT)

Sierra Club

Bob Clark, Senior Organizing Representative (Missoula, MT)

Transition Missoula

Claudia Brown (Missoula, MT)

Westslope Chapter of Trout Unlimited
James Short, Board President (Missoula, MT)

Women's Voices for the Earth
Erin Switalski, Executive Director (Missou