



# Audubon NORTH CAROLINA

January 14, 2016

Ms. Joelle Burleson  
Division of Air Quality  
North Carolina Department of Environmental Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641

*Submitted electronically via [daq.publiccomments@ncdenr.gov](mailto:daq.publiccomments@ncdenr.gov)*

**RE: Comments on proposed rules for carbon dioxide emissions standards for existing electric utility generating units under Clean Air Act Section 111(d).**

Dear Ms. Burleson,

In 1902, Audubon North Carolina was formed and helped spur wildlife conservation and protection efforts in the state. Today, on behalf of over 25,000 members and supporters, Audubon conserves and restores habitat we share with all wildlife, focusing on the needs of birds. Audubon North Carolina achieves this mission through a blend of science-based research and conservation, education and outreach, and advocacy.

In September 2014, Audubon released its groundbreaking Birds and Climate Change Report. To prepare this report, Audubon scientists used hundreds of thousands of citizen-science observations and sophisticated climate models to predict how birds in the U.S. and Canada will react to climate change. This work defines the climate conditions individual bird species need to survive, then maps where those conditions will be found in the future as the Earth's climate responds to increased greenhouse gases. The report is the broadest and most detailed study of its kind, and is the closest thing we have to a field guide of the *future* of North American birds.

The results of this peer-reviewed study are clear – climate change represents the greatest long-term threat to birds, endangering over half of America's bird species by 2080. Here in North Carolina, a total of 170 bird species, including iconic birds such as the Brown Pelican, Wild Turkey, Osprey, and Brown-headed Nuthatch are in trouble due to climate change. You can learn more about the study and its results here: <http://climate.audubon.org/article/audubon-report-glance>

Given the threat that climate change poses to North Carolina's natural heritage, the international community, the United States and individual states must all play an important role

in establishing ambitious, yet achievable and cost effective goals and implementation plans to reduce greenhouse gas emissions. Given its low emissions profile and rapidly declining costs, expanding renewable energy that is properly sited and designed should be a core component of North Carolina's emissions reduction strategy. Audubon encourages DEQ to develop a 'Smart from the Start' Program to support renewable energy developers in identifying and avoiding harm to sensitive bird habitat, migratory pathways and important natural areas as soon as possible in the renewable energy or biomass feedstock project planning process.

The Environmental Protection Agency's (EPA) Clean Power Plan under Section 111(d) of the Clean Air Act has established reasonable emissions reductions goals and provides states with significant flexibility in choosing how to meet those goals. We respectfully request that the Environmental Management Commission (EMC) not approve the proposed rules as submitted and instead encourage the Department of Environmental Quality (DEQ) to prepare and resubmit a new rule or 'backup plan' that fully complies with the emissions reduction goals that have been set by EPA. Waiting for all possible legal challenges to be resolved risks gambling with North Carolina's natural heritage and could lead to higher energy costs for North Carolina consumers.

The proposed 'backup plan' should be informed by a wide range of stakeholder groups and public opinion prior to release. North Carolina should consider approaches such as the open stakeholder listening sessions and working groups that informed regulators in Virginia and South Carolina. Soliciting and incorporating stakeholder feedback early in the compliance planning process will increase confidence in the regulatory process and the durability of the final plan.

Finally, at a time when we need higher levels of cost effective renewable energy to come online in North Carolina to meet the Clean Power Plan, we must send the appropriate market signals to industry. DEQ should recommend that North Carolina lawmakers keep in place and further strengthen important and complementary renewable energy policies such as the Renewable Energy and Energy Efficiency Portfolio Standard (REPS).

Thank you for accepting these comments. Audubon North Carolina looks forward to continued engagement with you on this important issue and working together to protect our state's natural heritage by expanding renewable energy and providing support to renewable energy developers to ensure that it is as bird-friendly as possible.

Sincerely,



Heather Hahn  
Executive Director  
Audubon North Carolina