

October 31, 2017

Peter Tsirigotis
Sector Policies and Programs Division (D205-01)
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

Dear Mr. Tsirigotis,

The undersigned organizations respectfully request a public hearing on the proposed repeal of the Clean Power Plan (CPP). A public hearing will provide an essential forum for our community and the public to share input and raise concerns related to this proposal. The undersigned represent members of NHC's Housing, Health and Energy working group. This group formed in response to the Clean Power Plan to provide expertise and comments on housing, especially low income housing, and improving energy and health performance of affordable housing overall and as part of CPP. The group continues to advocate and work towards those goals.

We ask for this hearing in part because energy efficiency in affordable housing is an essential element to saving energy and reducing carbon pollution. Residential energy use is an under-explored area for achieving efficiency gains. This is especially true for low-income households in multifamily rental housing, as illustrated by a recent study that found multifamily rentals have far fewer energy efficiency measures than any other type of housing and spending by renters on home energy has increased by 53 percent from 2000 to 2010, more than twice the rate of growth in spending on all other types of goods and services.¹

Energy efficiency in homes has benefits beyond the energy savings. Lower energy costs allow households to spend more on essentials like food and health care or to save for the future. Lower and more predictable energy costs also improve the affordability of housing for low-income households. More efficient homes also reduce residents' risk of exposure to several environmental health threats that produce conditions such as respiratory symptoms, asthma, cancer, and cardiovascular disease.²

The CPP offered an opportunity to achieve energy efficiency gains in housing. Both the Clean Energy Incentive Program and the overall CPP would have encouraged essential investments that reduced carbon emissions cost-effectively while producing health benefits and cost savings for low-income households. For this reason, the undersigned request a public hearing process to discuss the inclusion of energy efficiency in affordable housing in future EPA plans.

Additionally, it is essential for the public to have a location accessible to a diverse array of impacted individuals to provide input on this action. These hearings should be held in Washington, DC, and in places across the country. The undersigned organizations would like to see a robust public engagement process as the EPA considers the repeal of the Clean Power Plan.

For these reasons, we request a public hearing under sections 307(d)(5) of the Clean Air Act on your proposed repeal of the Clean Power Plan. We ask that this hearing provide an opportunity for public participation, with hearing (s) held in a broadly accessible location, scheduled for a reasonable duration, and with sufficient time for individual organizations and members of the public to provide meaningful input.

¹ Gary Pivo, *Unequal access to energy efficiency in US multifamily rental housing: opportunities to improve* (Building Research and Information, 2014), 42:5, pp. 551-573.

² Hilary Thomson, Sian Thomas, Eva Sellström, and Mark Petticrew, "Housing Improvements for Health and Associated Socio-Economic Outcomes: Cochrane Database of Systematic Reviews (2010) DOI: 10.1002/14651858.CD008657.pub2



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To discuss any of these comments in further detail, please contact Rebekah King, Policy Associate, National Housing Conference, (202) 466-2121 x248, rking@nhc.org.

Sincerely,

Enterprise Community Partners
National Housing Conference
National Housing Trust
Natural Resources Defense Council
Stewards for Affordable Housing of the Future
U.S. Green Building Council