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October 1, 2001

Chair
Council on Environmental Quality
Executive Office of the President
17th and G Streets, NW
Washington, DC 20503
Attention: Task Force

Submitted via facsimile to: 202.456.6546 and regular mail

**RE: Comments on Executive Order 13212,
FEDERAL REGISTER, Vol. 66, No. 161,
66 FR 43586**

Georgians for Clean Energy submitted public comments during EPA's 90-day review of the Interpretation and Enforcement of Clean Air Act New Source Review Programs that are relevant to Executive Order 13212 in the form of:

- 1) Our organization's oral public comments presented by Rita Kilpatrick during the EPA's public hearing held in Baton Rouge on July 20, 2001, and
- 2) Our organization's sign-on support of written public comments submitted in a joint filing by the Clean Air Task Force and other non-profit organizations throughout the country, dated July 24, 2001 in EPA Docket No. A-2001-19.

Please refer to the above-mentioned comments, all of which are relevant to Executive Order 13212, and are already part of the official record for the EPA's 90 day NSR review.

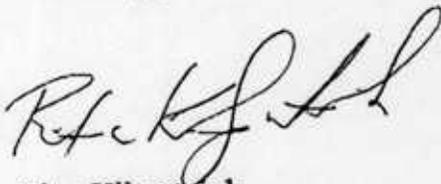
In addition, we submit the following supplemental comments related to the issues of Executive Order 13212.

Georgians for Clean Energy has the following concerns about the creation of a "federal interagency task force which will work with and monitor federal agencies' efforts to expedite their review of permits or take other actions necessary to accelerate the completion of energy-related projects, while maintaining safety, public health, and environmental protections":

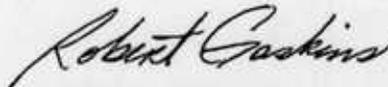
- This new task force must not undermine or weaken the environmental regulation of energy projects, and New Source Review permitting in particular, endangering public health through air pollution at unacceptable levels.
- This new task force must not eliminate EPA's federal, legal responsibilities to ensure that energy projects meet NSR requirements.
- This new task force must not push to expedite environmentally-destructive energy projects under the guise of a perceived energy supply crisis. Georgia's real energy crisis is an energy-efficiency crisis and a water and air crisis. Our state suffers from chronic and inadequate planning for energy efficiency resources. Over the last 5 years, Georgia has suffered from an excess of power plants proposed or constructed to such a serious degree that, recently, the State of Georgia has been forced to place a hold on natural gas plant permit applications. Our state is an electricity exporting state. The last major coal plant built in Georgia, Plant Scherer, was built under a utility promise that these new power supplies were truly needed for our state; yet after plant construction was completed, the utility sold a significant amount of the plant to out of state utilities. Such Georgia circumstances call into question the existence of a so-called "energy supply crisis" that has been portrayed at the national level.
- A new task force must not curtail or eliminate the public involvement process, reduce citizens' ability to shape the future of their communities, or break down the important policy role that citizens play in the process.

Please do not hesitate to call us at 404-659-5675 for additional information.

Sincerely,



Rita Kilpatrick
Executive Director



Robert Gaskins
Clean Air Director

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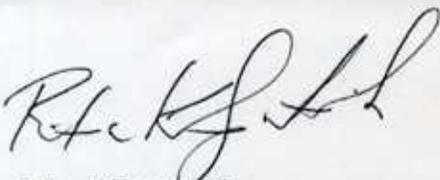
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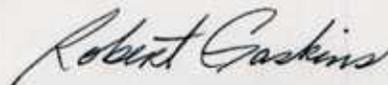
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