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Building and Construction Trades Department

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January 27, 2010

Hon. Rahm Emmanuel, Chief of Staff
The White House
1600 Pennsylvania Ave., NW
Washington, D.C. 20500

Dear Mr. Emanuel:

On behalf of the affiliated union of the AFL-CIO Building and Construction Trades Department, I am deeply concerned that aggressive implementation of GHG mitigation options available under the Clean Air Act could have severe negative consequences for our workers. While recognizing the importance of addressing pollution from power generation and heavy manufacturing, I am concerned that overly aggressive action in the absence of effective, economical pollution control technology could result in unintended consequences that hinder the employment growth necessary for a full economic recovery. We in the Building Trades are committed to working with the Agency as it proceeds on these important issues, but I must request that you reexamine the Administration's decision to proceed with the regulation of greenhouse gases at stationary sources by a process that overlooks important technological and economic conditions.

Our unions agree strongly with the Administration's numerous public statements that Congressional action is the most appropriate mechanism for defining the scope of domestic commitments to reduce greenhouse gas emissions that cause climate change. Further, we know that comprehensive legislation is the best means for realizing the wide-ranging employment opportunities that are possible in a clean energy, low-carbon economy. Indeed, that is why the Building Trades Department was among the first union organizations to endorse cap-and-trade legislation being considered in Congress.

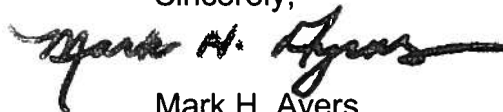
However, many of those opportunities will not be economically feasible absent the incentives and policy options possible through the enactment of national legislation. Further, balanced economy-wide legislation is the only means to take into account the wide ranging economic, energy, environmental, and social consequences of mandatory policies to reduce greenhouse gas (GHG) emissions. Our unions will be hard-pressed to support actions that lack the appropriate incentives to encourage both emissions reductions and job growth, while potentially having a chilling effect on the construction activities that put our members to work.

Further, we remain concerned that EPA and the Administration have not yet conducted a comprehensive economic analysis of the impacts including impacts on employment of proposed GHG rulemakings, including the Prevention of Significant Deterioration (PSD) and the Title V Greenhouse Gas Tailoring rule. We therefore are concerned that the revitalization of the very industries that will provide the energy and materials necessary to restart our economy and restore the jobs lost since the recession started will be stopped in its tracks while EPA and the states determine how to implement such regulation. For our economy to restore the millions of jobs needed for economic revitalization environmental protection and economic growth must be considered together.

I hope you will consider our views and concerns as the Agency proceeds on these important matters. Of course, my Department welcomes the opportunity to meet with appropriate staff to discuss these critical issues.

Thank you for your consideration of my concerns. I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark H. Ayers", with a long horizontal flourish extending to the right.

Mark H. Ayers
President

Cc: Honorable Lisa Jackson, Administrator
US Environmental Protection Agency
Cc: Honorable Lawrence Summers, Director
National Economic Council