LEAGUE OF WOMEN VOTERS®
OF THE UNITED STATES

February 21, 2014

U.S. EPA Headquarters
1201 Constitution Ave. NW
Washington, DC 20460

Comments for the Environmental Protection Agency's Proposed Standard Reducing Carbon Pollution from New Power Plants

Submitted online via Regulations.gov

Docket ID: EPA-HQ-OAR-2013-0495

S**upport.** The League of Women Voters of the United States (LWVUS) supports the proposed new source performance standard for emissions of carbon dioxide by the Environmental Protection Agency (EPA) in September 2013. LWVUS strongly supported the first iteration of this proposed regulation in 2012 and worked to collect comments regarding this groundbreaking proposal from our 140,000 members and supporters across the United States. We stand in support of the updated proposal, and commend the EPA for continuing to seek public input on this historic regulation. Taking steps to reduce the amount of carbon dioxide are essential to protect our children and future generations from the effects of climate change. LWVUS urges the EPA to go even further by limiting carbon pollution from existing power plants to achieve at least a 20 percent reduction below 1990 levels by 2020.

Importance. When President Obama announced his plan to fight climate change in June 2013, the League called it a "turning point in the fight against climate change." Climate change is the greatest challenge of our lifetime and LWVUS commends the EPA for taking the steps laid out by the President. Power plants are the largest contributor of carbon emissions, making them the chief cause of climate change. This new clean air standard will protect public health, fight climate change, and create jobs through innovation in cleaner, safer energy technology.

Burning coal accounts for about half of the electricity generated in the U.S. and carbon pollution from U.S. power plants accounts for 40 percent of the CO2 emissions that contribute to climate change.[1] Carbon pollution that causes climate change is responsible for increased air pollution that can cause thousands of deaths every year if it continues to remain unchecked. We must protect public health by extending limits like the ones placed on arsenic, lead, mercury and soot, to carbon pollution. We have a moral obligation to our children and future generations to address the cause of climate change beginning with CO2 emissions from new power plants.

Increasingly dangerous CO_2 levels. The level of CO_2 in the atmosphere now far exceeds the natural range from the previous 800,000 years, according to ice core records.[2] In the pre-industrial world, the atmospheric concentration of CO_2 averaged about 285 parts per million (ppm). At the time of the UN Earth Summit in 1992, atmospheric CO_2 was about 355 ppm. In April 2012, the level reached 396 ppm. And April saw the 326th straight month with global temperatures above the 20th century average.[3]

Economic consequences. Failing to take timely action to curb carbon pollution has serious economic consequences.

1. Extreme weather events, including drought, hurricanes, like superstorm Sandy, and floods, are costing billions of dollars in damages in this country alone.[4]
2. Climate change-related events such as heat waves, high levels of ozone pollution, and outbreaks of vector-borne diseases have already had a significant impact on health care costs.[5]
3. The longer we allow CO_2 concentrations to rise, the more drastic the eventual cuts in emissions — and the higher the associated costs — will be.
4. In the absence of a coherent clean energy policy, the U.S. is falling behind in developing and bringing to market the emerging technologies that sustain economic growth.[6]

Urgency. The U.S. must take aggressive action to reduce greenhouse gas emissions from all sources, with emissions reduction targets of at least 20 percent below 1990 levels by 2020 and 80-100 percent below 1990 levels by 2050. Reaching these targets will require current power plants to dramatically reduce their carbon emissions, and the League of Women Voters urges the EPA to require those steps as quickly as possible.

---

1 U.S. Department of Energy, at http://fossil.energy.gov/programs/powersystems/pollutioncontrols/Retrofitting_Existing_Plan ts.html

2 *High-resolution carbon dioxide concentration record 650,000-800,000 years before present*, Nature, May 2008, at http://www.nature.com/nature/journal/v453/n7193/abs/nature06949.html.

3 http://co2now.org/

4 National Oceanic and Atmospheric Administration, at http://www.noaanews.noaa.gov/stories2012/20120119_global_stats.html

5 *Six Climate Change-Related Events in the United States Accounted for About $14 Billion in Lost Lives and Health Costs*, Kim Knowlton et al, Health Affairs, November 2011, at http://content.healthaffairs.org/content/30/11/2167.abstract

6 *How to Power the Innovation Lifecycle: Better Policies Can Carry New Energy Sources to Market*, Center for American Progress, June 2010, at http://www.americanprogress.org/issues/2010/06/innovation_lifecycle.html