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U.S. EPA Headquarters
1201 Constitution Ave. NW
Washington, DC 20460
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Comments for EPA Public Hearing on Reducing Carbon Pollution from Existing Power Plants

Support. The League of Women Voters of the United States strongly supports the Clean Power Plan proposed by the Environmental Protection Agency (EPA). We believe that taking steps to reduce this dangerous greenhouse gas are essential to protect our children and future generations from the effects of climate change. We commend the EPA for holding this public hearing, and others like it across the country, to allow public comment on the proposed standard for existing power plants. The League does believe, however, that the EPA proposal can and should be strengthened to better and more realistically recognize the tremendous potential for renewable energy and energy conservation in cutting carbon emissions.

Importance. 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.

According to the American Lung Association, nearly half of Americans live in counties that have unhealthy levels of dirty air. Dirty air, exacerbated by the climate change caused by carbon pollution, is responsible for premature deaths, respiratory disease and a higher risk of asthma attacks. It also disproportionately affects low income communities, as well as children, seniors and those who work or play outdoors. It can also lead to hundreds of missed work and low activity days.

International and national scientific reports have shown that inaction will only increase the impacts and threats that climate change brings to our communities across the country. From increased health risks to devastating extreme weather events, climate change is threatening the lives of those around us. We have a moral obligation to our children and future generations to address the cause of climate change by cutting CO₂ emissions from existing power plants. Setting sensible carbon pollution standards for **all**

power plants is the right thing to do.

Increasingly dangerous CO₂ levels. The level of CO₂ 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 CO₂ averaged about 285 parts per million (ppm). At the time of the UN Earth Summit in 1992, atmospheric CO₂ 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 CO₂ 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

Need for stronger standards. The EPA made an important first step by proposing a rule to cut carbon pollution from new sources, and now comes forward with a proposal to cut carbon pollution from existing sources. We applaud EPA for taking these steps and we strongly support these proposals. But we also encourage you to work with state stakeholders to be more aggressive when determining final actions to reduce this deadly form of pollution. The League would like to see a 35 percent reduction in carbon pollution by 2030.

Reducing emissions from existing power plants is critical to addressing the growing danger that climate change poses to the health and welfare of U.S. citizens and people around the world, as acknowledged by both leading climate scientists and the EPA. Because of the need for immediate action, we believe that the EPA should speed up its consideration of these vitally important rules, and certainly should allow no slippage in the current timetable or in the interim steps called for in the plan.

In addition, the League believes that the EPA proposal should be strengthened by providing for greater use of renewable energy and energy efficiency in displacing carbon emissions from power plants. The state-by-state targets in the proposal are not based on policies already adopted by each state. Instead, the EPA approach underestimates the use of renewables and conservation and, for some states, assumes less use of renewables and conservation in 2030 than is already in place today or less than has already committed to by the state.

We urge you to more accurately estimate the potential for use of renewable energy and to strengthen the state-by-state targets accordingly. Similarly, energy conservation can realistically play a larger role in displacing carbon emissions and that should be recognized in the state estimates as well.

Urgency. The American public supports the EPA when it comes to strong regulations that will protect the health and well-being of our children and our communities. The U.S. must take aggressive action to reduce greenhouse gas emissions from all sources, with emissions reduction targets of at least 35 percent below overall 2005 levels by 2030. 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_Plants.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.noaaews.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