



LEAGUE OF WOMEN VOTERS®
OF MASSACHUSETTS

November 30, 2014

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

RE: EPA-HQ-OAR-2013-0602

**Comments Regarding the Proposed EPA Clean Power Plan
To Reduce Carbon Pollution from Existing Power Plants**

The League of Women Voters of Massachusetts supports the Clean Power Plan proposed by the Environmental Protection Agency (EPA) and deeply appreciates the opportunity for public comment.

Given the urgent [need for immediate](#), meaningful action on climate change, LWVMA urges that the Plan be strengthened through reassessment of the current and projected role of renewable energy generation options. [Existing renewable energy generation](#) is greater than indicated in the draft Plan, validating the conclusion that an expanded role of the renewable energy building block would increase the level of cost-effective, renewable energy generation possible in the United States, making higher emissions reduction targets achievable.

Climate change is a global issue, but as a coastal state, [Massachusetts](#) is particularly vulnerable to some of its worst impacts, including sea level rise and the increasing ferocity of weather events that threaten the health and safety of residents; vital transportation, energy and communications infrastructure; and our economy. As [Sandy](#) and other recent super storms have demonstrated, the impacts of climate change are evident today. In the last two years alone, Boston has ‘dodged’ four so-called “[100 Year Storm](#)” events.¹

Recent reports from the [IPCC](#), the [National Climate Assessment](#) and the [Department of Defense](#) make it abundantly clear that these impacts will only worsen with time. It is the most disadvantaged among us who will suffer the most at the local, regional and global level, making climate change a moral as well as an environmental and economic issue. As underscored by the findings of these reports, adaptation plans are necessary to deal with the immediate and future consequences of climate disruption, but there is a critical need for significant, proactive measures to ameliorate the unimaginable devastation confronting future generations.

Burning coal accounts for about half of the electricity currently generated in the U.S., and carbon pollution from U.S. power plants accounts for approximately [40 percent of the CO₂ emissions](#) that contribute to climate change. Emissions from power plants take an enormous toll on our health and the environment. Estimated [health care costs](#) associated with six climate change-related events from 2000-2009, including the value of lives lost due to premature deaths, exceeded \$14 billion. These costs are borne by families and society, not the polluters. These [costs](#) are expected to rise as global warming continues and will far exceed the cost of timely action.

Recent EPA proposals to reduce carbon pollution from future as well as existing power plants are clear steps in the right direction of addressing climate change that merit support. Implementing these proposals

¹ Brian Swett, Chief of Environment, Energy and Open Space, Boston, MA: Wellesley, MA presentation, Nov. 1, 2014.



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will result in significant health and environmental benefits while spurring an innovation economy based on sustainable, renewable energy sources.

However, given the urgency and the time needed to implement effective measures, even bolder action is required to adequately address the climate change crisis. Promoting a stronger role for renewable energy makes bolder action possible.

A review of the current status of renewable energy adoption and related growth projections for the U.S. renewable energy sector suggests that the EPA has underestimated the potential role of renewables in its plan. As reported in a [policy brief](#) from the Union of Concerned Scientists:

- “In seven states, actual renewable energy generation levels in 2013 exceed the EPA’s renewable energy targets in 2030.
- Seventeen of the 29 states with Renewable Electricity Standards (RESs) policies have lower targets under the EPA approach than what is already required under their respective state laws.
- The average annual national renewable energy growth rate under the EPA proposal is 0.65 percent of total sales between 2017 and 2030. By contrast, many states have already been achieving an average annual growth rate of more than 1 percent over the last five years.”

LWVMA urges the EPA to *accelerate* the transition from dirty to clean energy by establishing a much larger emission reduction target of 35-40% reductions below 2005 levels by 2030 through the following actions:

- Stronger role for renewable energy and energy efficiency as means for displacing carbon emissions from power plants;
- Supporting state and regional efforts to price carbon to reflect the true cost of carbon-based pollution in terms of health and environmental impact. Pricing carbon based on its [social cost](#) will send a market signal that will stimulate a more rapid shift from fossil-based fuels to clean, renewable energy.
- Steadfast adherence to the established reductions’ timeline.

In 1963, Dr. Martin Luther King called on the nation to recognize the “[fierce urgency of NOW](#)” for ensuring civil rights for all citizens. The pressing, fundamental need for equity demanded a rejection of “gradualism.” Climate change presents an existential threat to civilization due to the irreversible destruction of the biosphere and demands that same level of urgency. There is no more time to waste; the time to act is now.

Thank you for the opportunity to comment and for your consideration of these comments.

Sincerely,

Handwritten signature of Anne S. Borg in cursive.

Anne S. Borg

Handwritten signature of Marilyn Peterson in cursive.

Marilyn Peterson

Co-Presidents, League of Women Voters of Massachusetts