PEC Comments about EPA’s New Carbon Pollution Standards

Docket ID: EPA-HQ-OAR-2013-0602 - Support Carbon Pollution Standards for Power Plants

Date: October 2, 2014

Dear Administrator McCarthy,

Thank you for proposing limits on carbon pollution from existing power plants. As a nationwide network that cares for God’s Creation, Presbyterians for Earth Care (PEC) is deeply concerned about the effects of the burning of fossil fuels on climate change and the threats on the well being of current and future generations. Presbyterians understand God’s Creation to be sacred and our denominational policy states “God’s work in creation is too wonderful, too ancient, too beautiful, too good to be desecrated.” Limiting carbon pollution from power plants is a crucial step to protect God’s Creation, including all life, particularly those most vulnerable to the negative effects of climate change.

Although the proposed rule to reduce carbon dioxide emissions is a bold step, it unfortunately falls far short of what is needed. EPA should strengthen its proposal by

- Calling for more ambitious reductions of carbon emissions from power plants by at least 50% from 2005 levels by 2030
- Requiring at least 80% of our energy from non-fossil fuel sources, renewable energy and energy efficiency, by 2050
- Ensuring that states meet their interim goals by not allowing beginning dates past 2020.

States should be encouraged to reduce carbon emissions by closing fossil fuel plants to the full extent possible through maximizing efficiency and aggressively increasing renewables. In addition, it is important to PEC that the final rule for the Clean Power Plan explicitly lists a carbon tax as an option for states to comply with the standards. Guidance should be provided to states on implementation and administration of such a tax, including acceptable dollar amounts and escalation rates. States should have as many options as possible available to them, as long as the measures are effective in reducing carbon emissions.

As a faith-based environmental organization, Presbyterians for Earth Care advocates for environmental justice for all God’s people and all God’s creation. If we hope to prevent the worst impacts of climate change and protect communities around the world, strengthening the
proposed carbon emission standards and requiring investment in and development of non-fossil fuel renewable energy sources are important steps toward reaching that goal.

Thank you for taking this courageous action to lead the world in protecting the future of our nation and our planet.

Sincerely,

Diane Waddell
Presbyterians for Earth Care Moderator

“The LORD God took the human and put him in the Garden of Eden to till it and keep it” Genesis 2:15