

**Comments for EPA hearing on the proposed Clean Power Plan,
Atlanta, Georgia, July 29, 2014 on behalf of the
Climate Change Task Force of the League of Women Voters of the US.**

I'm Joyce Lanning from Birmingham, Alabama, and a proud grandmother. Since 2008, I've also been a member of the Climate Change Task Force of the League of Women Voters of the United States, the role that brings me here today. Thank you for this opportunity to speak – a first for me in my 71 years.

Picture with me a time almost 43 years ago. I can barely see the smokestacks of Birmingham's skyline through the reddish-brown haze that signaled prosperity for our community back then. It was November 1971, and the health hazards from visible air pollution trapped over our city by stagnant air were so bad that the Health Department begged the smokestack industries to shut down for a few days until the air cleared and the danger to anyone who breathed was over.

When industries refused, a Federal District judge, for the first time in the country since the year-old Clean Air Act was passed, invoked its emergency powers and ordered over 20 of the largest polluters idled until the toxic emergency was over. It worked, but city businessmen complained that it was far too aggressive. The county health officer said, "If you are saying that we should be counting bodies before we do something, I disagree."¹

Seems to me that's where we are today with invisible carbon pollution from electric power plants – needing to act before the 'body count' gets much higher. Already we are seeing and feeling the impacts of too much CO₂ - a warming planet, devastating extreme weather events, droughts and forest fires, rising sea levels, storm surges and an increasing 'body count' - in lives, health, jobs, property and prosperity.²

We must set limits on carbon pollution because the market is failing to give us the true cost of electric power. I taught college economics. A market only works when the price correctly includes the full costs, like health impacts, premature death, environmentally destructive mining, and the damages caused by climate change. The price for electricity fails to include these external damages.³

You can picture it this way: a male African elephant can weigh 6.8 metric tons. Using the air as a free waste dump, we're tossing almost 300 million elephants into the sky every year – just in the US.⁴ Now see them falling back down on us, creating havoc with the systems that support us and other life on our planet.

The Clean Air Act has successfully addressed dangers from particulates, lead and harmful gases with benefits significantly greater than the costs, which were far lower than the disastrous costs predicted by opponents.⁵ By releasing American ingenuity, benefits of this proposed rule can also exceed costs.⁶

In 2010, LWWUS created a Toolkit for Climate Action⁷ for local Leagues to use as a resource for addressing climate disruption. Our recent update focused on adapting to

changes already in the pipeline, but we still need to dramatically reduce the amount of CO₂ we're dumping into the atmosphere. This proposed rule will support the work of our nearly 800 state and local Leagues across the country.

The good news is that this rule, for example by encouraging energy efficiency, can help consumers save energy and money by cutting their electricity use and their utility bills. And the proposed Clean Power Plan gives states the flexibility to choose the most cost-effective measures to achieve the needed reductions.⁸

The Department of Defense is leading the way - not waiting for certainties that never come. They already understand the potential 'body count.' They're managing major risks by cutting their energy use and reducing their carbon footprint.⁹

The LWV has advocated reductions in CO₂ emissions for 15 years. Most recently, delegates to our national convention in June voted overwhelmingly to support putting a price on carbon.¹⁰ The League and our Climate Change Task Force strongly endorse this proposed rule to limit carbon pollution from power plants.

As for me, personally, I was jolted out of my complacency in 2007¹¹ and continue to learn about the risky carbon business¹² that threatens us and all who come after us. I support this rule as a step toward a healthy future I envision for our own young and the young of all species.

Again, thank you.

Submitted by:

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¹ "An old cloud of polluted air lifts from Birmingham's shoulders"
http://blog.al.com/spotnews/2011/11/an_old_cloud_of_polluted_air_1.html

² 2014 National Climate Assessment. U.S. Global Change Research Program
<http://nca2014.globalchange.gov/>

³ Muller, Nicholas Z., Robert Mendelsohn, and William Nordhaus. 2011.
"Environmental Accounting for Pollution in the United States Economy." *American Economic Review*, 101(5): 1649-75.
<http://www.aeaweb.org/articles.php?doi=10.1257/aer.101.5.1649>

⁴ U.S. energy-related emissions of carbon dioxide (CO₂) by the electric power sector in 2012 were 2,039 million metric tons, which is almost 40% of energy-related emissions.
<http://www.eia.gov/tools/faqs/faq.cfm?id=77&t=11>

⁵ National Center for Environmental Economics: "The Benefits and Costs of the Clean Air Act 1990 to 2010: EPA Report to Congress"

<http://yosemite.epa.gov/ee/epa/erm.nsf/vwrepnumlookup/ee-0295a?opendocument>

⁶ “Regulatory Impact Analysis for the Proposed Carbon Pollution Guidelines for Existing Power Plants and Emission Standards for Modified and Reconstructed Power Plants: Chapter 8: Comparison Of Benefits And Costs”

<http://www.epa.gov/ttn/ecas/regdata/RIAs/111dproposalRIAFinal0602.pdf>

⁷ League of Women Voters of the US: Toolkit for Climate Action.

http://participate.lwv.org/c/9217/p/salsa/web/common/public/content?content_item_KEY=3766

⁸ “... we believe that the impacts on electricity *rates and bills* from well-designed CO₂ pollution control programs will be modest in the near term, especially for low-income customers” and “With the EPA Clean Power Plan the rate goes up but the bill goes down.” *EPA’s Clean Power Plan: States’ Tools for Reducing Costs and Increasing Benefits to Consumers*, Analysis Group, July 2014, p. 3.

⁹ Department of Defense: Strategic Sustainability Performance Plan, FY 2012

http://www.acq.osd.mil/ie/download/green_energy/dod_sustainability/2012/DoD%20SSPP%20FY12-FINAL.PDF

¹⁰ “The LWVUS should support a price on carbon emissions that will increase in stages, as part of an overall program to improve energy efficiency and to replace fossil fuels with renewable energy, fast enough to avoid serious damage to the climate system.”

¹¹ The Nobel Peace Prize 2007 was awarded jointly to Intergovernmental Panel on Climate Change (IPCC) and Albert Arnold (Al) Gore Jr. *“for their efforts to build up and disseminate greater knowledge about man-made climate change, and to lay the foundations for the measures that are needed to counteract such change”*

http://www.nobelprize.org/nobel_prizes/peace/laureates/2007/

¹² Risky Business: The Economic Risks of Climate Change in the United States, www.riskybusiness.org