

Alabama Environmental Council * Carolinas Clean Air Coalition * Center for a Sustainable Coast * Coastal Conservation League * Conservation Voters of South Carolina * Fall-line Alliance for a Clean Environment * Faiths United for Sustainable Energy * Florida State University Environmental Service Program * Georgians for Smart Energy * Humanist Fellowship * Southern Alliance for Clean Energy * Upstate Forever * Waccamaw RIVERKEEPER

June 23, 2009

The Honorable Lisa Jackson
United States Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mailcode 6102T
1200 Pennsylvania Avenue, NW
Washington, DC 20004

RE: Docket ID No. EPA-HQ-OAR-2009-0171

Dear Administrator Jackson:

The undersigned organizations strongly support finalizing the EPA's determination that greenhouse gases endanger the public health and welfare. We encourage the EPA to take rapid regulatory action to address this danger in a comprehensive manner.

The record is clear that the pollutants EPA addresses in the "Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act" (74 Fed. Reg. 18,886) are already demonstrating the danger they pose. Carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride affect the climate, endangering communities in the Southeast United States. Rising greenhouse gas concentrations present a very real danger to the health and welfare of this and future generations.

As groups representing the Southeastern United States, we are particularly concerned with the magnitude of damage global warming-related problems would cause our extensive coastline through rapid sea level rise, storm surges and more frequent and intense storm and hurricane activity. The June 2009, State of Knowledge Report from the U.S. Global Change Research Program states that sea level will rise between 3 to 4 feet by the end of this century under higher emissions, exceeding 2007 IPCC estimates. Places, like the Southeast U.S., where land is naturally subsiding will be disproportionately impacted compared to the rest of the nation. Businesses, homes, schools, churches and citizens will be forced to relocate, and national treasures will be lost.

Further inland, changes in precipitation patterns – especially in our Appalachian Mountain and other unique ecosystems across the Southeast – and a warmer climate threaten economic prosperity, public health and way of life. Within this century, annual

temperatures are projected to rise between 4.5°F to 9°F (under higher and lower emission scenarios respectively). Higher air and water temperatures could lead to more heat-related deaths, declines in crop yields and forest productivity as well as fish kills and loss of aquatic diversity.

To address these threats, we fully support and encourage a process to finalize the endangerment finding quickly and use the resulting authority under the Clean Air Act to reduce greenhouse gas emissions from both mobile and stationary sources. Moving rapidly to address greenhouse gas emissions from all sources – mobile and stationary, large and small – is essential to avoid the devastating health and economic consequences of inaction.

And while the existence of this endangerment finding is certain to spur legislative activity, we caution the EPA against viewing this process as secondary to the cap-and-trade debate currently taking place in Congress. The legislative process is full of uncertainty and moving forward on this finding is critical to our ultimate success by ensuring that we are not solely dependent on Congress and the political process. The stakes are much too high.

For example, despite an increasing number of commercial entities who have publicly acknowledged the reality of the climate change threat, power generators in our region continue to seek permits to build new coal-fired power plants and other facilities, committing us to significantly higher emissions of greenhouse gases and other pollutants than are safe. An endangerment finding would provide EPA with new and important tools to address emissions from these facilities in order to protect human health and the environment.

For the reasons above, we support finalizing the endangerment finding quickly and promulgating subsequent regulations to reduce greenhouse gas emissions from all mobile and stationary sources. This is an important process that should proceed regardless of any progress Congress makes in crafting and enacting comprehensive climate change legislation.

Sincerely,

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