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**PUBLIC COMMENTS REGARDING THE ENVIRONMENTAL  
PROTECTION AGENCY'S NEW SOURCE PERFORMANCE STANDARDS  
ON GREENHOUSE GAS EMISSIONS**

ATLANTA, GEORGIA  
FEBRUARY 15, 2011

Good afternoon. My name is Seandra Rawls and I am the Diversity and Community Partnerships Coordinator for the Southern Alliance for Clean Energy, based here in Atlanta, GA. We are a regional organization, representing citizens across the Southeast. We support EPA's authority and decision to design strong New Source Performance Standards for greenhouse gases (GHG) to protect our climate and safeguard low-income communities and communities of color who stand to suffer more from climate change than others.

Here in the Southeast, we have nearly 90 coal plants from Kentucky to Mississippi<sup>1</sup>, whose average age is 7 years older than most U.S. coal plants. Many of these facilities live far beyond their intended lifespan, are inefficient, and emit more GHGs than their newer counterparts. Southeast coal plants emit around 350 Million tons of CO<sub>2</sub> every year<sup>2</sup>. NSPS

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<sup>1</sup> NC, SC, FL, AL, GA, MS, KY and TN

<sup>2</sup> Calculated from data available through EPA's Clean Air Market database, available at <http://camdataandmaps.epa.gov/gdm/index.cfm?fuseaction=iss.isshome>. Data is based on emissions from plants in FL, SC, NC, TN, GA, AL, MS and TVA plants in KY.

will give utilities necessary market signals to develop and implement new technologies to lower GHG emissions, retire old coal facilities, and drive electricity production toward less carbon-intensive sources.

Not only is the Southeast disproportionately contributing to the carbon load in the atmosphere with our dirty coal plants, we are also more vulnerable to the impacts of climate change. With over 2,000 miles of coastline<sup>3</sup>, 2.2 trillion dollars in property, and home to 16 million people, we are particularly susceptible to sea level rise, stronger storms, drought, saltwater intrusion, and the loss of ecosystems and coastal community resources. I'd like to submit a video documentary that SACE produced featuring some of our most treasured and vulnerable coastal places.

Additionally, about 80 percent of all US counties that experience persistent poverty<sup>4</sup> lie within the Southeast, making constituents here some of the most vulnerable to climate change impacts. Carbon pollution is also directly linked to other life-threatening pollution from coal-fired power plants like mercury, soot and smog. As our cities warm, ozone smog and corresponding asthma attacks will occur more frequently. African Americans and Latinos already experience disproportionate impacts from pollution based on where they live. These new standards offer a critical new opportunity to protect citizens from the effects of coal-fired power plant pollution, particularly low-income and minority communities' health.

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<sup>3</sup> Our coastline is low-lying – making it more vulnerable to SLR.

<sup>4</sup> Oxfam America, Exposed pg2

For these reasons and more, we support EPA's selection of carbon-reducing Best Demonstrated Technology and believe that new performance standards must drive new, efficient, and clean technologies. These technologies, such as carbon capture and sequestration and use of biomass as a fuel must be thoroughly vetted with sound science to ensure life-cycle carbon neutrality and not adversely contribute to the health and wellbeing of **any** surrounding communities. Additionally, NSPS ought not drive technological changes that increase demand for coal and destructive mining practices like mountaintop removal in attempts to reduce GHGs.

I'd like to thank EPA for the opportunity to comment today on this important rule making for greenhouse gas emissions. Thank you.