My name is Alice Howell (registered as Nancy Alice Howell), from Lexington, KY.

I thank the EPA for holding regional hearings across the US on the proposed Clean Power Plan.

I am committed to a brighter future for the Commonwealth of Kentucky that sees vibrant communities with diversified economies, a clean environment, and sustainable energy availability that will make our state a most desirable place to live. I believe that we all have an obligation to invest in and protect the future sustainability of the planet and its citizens.

When the EPA introduced the proposed Climate Rule in early June, 2014, that would reduce CO2 emissions at coal-fired power plants, there was hope that there would be more of an emphasis on replacing high-risk coal-fired, natural gas-fired, and nuclear power plants with low- to no-risk renewables and energy efficiency. Instead, the focus was primarily on the “end-of-the-pipe” CO2 emissions.

Though the proposed 30% reduction in CO2 emissions from dirty fossil fuel fired power plants by 2030 is a step in the right direction, this plan does not address all the environmental impacts of the whole fuel cycle on externalities such as air and water quality, severe effects of mountain top removal mining and other fossil fuel extraction methods, and the health and economic impacts on communities. Since these externalities are not considered, there is the moral dilemma that the human costs are assumed as acceptable, though there are alternatives available that do not cause harm to people.

Big polluters want to continue to spew nearly unlimited amounts of carbon dioxide pollution into the air we breathe without regard for the public health impacts on children, seniors, and families, instead of adopting reasonable safeguards for carbon pollution that will protect public health.

The Clean Power Plan does not do enough to address concentrations of localized pollution. We would like to see stronger incentives to protect low-income communities, who can be disproportionately affected by carbon pollution. The rule is silent on how it will enforce Title VI under their implementing regulations, which states that EPA-funded agencies are “prohibited from taking acts, including permitting actions, which have a discriminatory effect.”

In Kentucky, the Energy and Environment Cabinet believes that we have almost met the CO2 reduction requirements specified in the Clean Power Plan. In their smug, self-satisfied view, because of the coal-fired power plants that have already closed or are currently slated to be mothballed before 2020, there is little more that we will have to do meet the Carbon Plans goals. The Clean Power Plan does not incentivize Kentucky, or other similar coal/gas energy dependent states, to move toward sustainable energy development, to tap
the low-hanging fruit of economic development around energy efficiency, or to support demand-side energy efficiency.

With the EPA’s mission to protect human health and the environment, and one of its purposes being that environmental protection contributes to making our communities and ecosystems diverse, sustainable and economically productive, we ask:

EPA, please promulgate the strongest regulations we need to kick-start addressing the reality of climate change in Kentucky. Rather than pandering to the demands of the energy industry and the whining of the southeastern states about over-stepping your regulatory boundaries, center your Clean Power Plan on putting the wellbeing of the planet and its inhabitants in the priority position.

Thank you for the time and effort that you have put forward so far on addressing climate change.

Sincerely,

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