

GEORGETOWN CLIMATE CENTER

Georgetown State-Federal Climate Resource Center

To: EPA Administrator Jackson and EPA Docket

From: Vicki Arroyo, Executive Director, Georgetown Climate Center (Georgetown State-Federal Climate Resource Center)

Subject: Comments on EPA Endangerment Finding (EPA-HQ-OAR-2009-0171)

Date: May 14, 2009

The Georgetown Climate Center offers these comments in support of US EPA's proposed endangerment and "cause or contribute" findings under Section 202(a) of the Clean Air Act:

It is incontrovertible that the six greenhouse gases identified in the Administrator's endangerment finding constitute air pollutants that can be reasonably anticipated to "endanger public health and welfare" under the Clean Air Act. In addition to the findings of major assessments such as the Intergovernmental Panel on Climate Change and U.S. Climate Change Science Program cited by EPA in this notice, recent scientific literature paints a compelling picture that these assessments – as dire as they are in cataloguing both observed and anticipated adverse impacts of climate change – underestimate actual observed risks (e.g., ice loss and resulting sea-level rise) and the rate of change.¹ These recent observations and many others support the importance of finalizing this endangerment finding and moving forward with addressing pollutants that contribute to global warming without further delay.

We agree with the Administrator that there is ample evidence to find both direct and indirect endangerment to public health from storms, vector-borne diseases, increased frequency of heat waves and ozone exceedance days, etc. and innumerable adverse impacts on welfare as well. We also agree with the Administrator's decision that endangerment should be assessed without regard to potential GHG mitigation measures (this would constitute rather circular logic since such measures may only follow an endangerment finding) or adaptation. While adaptation, or coping, with some impacts of climate change is already necessary and will be of increasing importance, the challenges of adapting to the myriad risks we are facing will outstrip our ability to adapt.

In addition greenhouse gases emissions carry with them risks to which we simply cannot adapt, including some not highlighted in this notice. For example, in addition to the direct and indirect risks of warming and precipitation changes identified, acidification of oceans and waterways fits squarely in the definition of welfare losses that threaten our seas and the animals and plants that reside there, as well

¹ See, for example, Ramstorf, Stefan, "A semi-empirical approach to projecting future sea-level rise," *Science*. January 10, 2007; Meier, Mark et al. "Glaciers Dominate Eustatic Sea-Level Rise in the 21st Century," *Science*. August 24, 2007 re: ice dynamics and projected sea level rise. Regarding increased smog see Sitch, S. et al. "Indirect radiative forcing of climate change through ozone effect on the land carbon sink," *Nature*. August 16, 2007. For millions in US Southwest and in Mexico to be left high and dry, see Barnett, Tim and David Pierce, "Sustainable water deliveries from the Colorado River in a changing climate," *Proc. Natl. Acad. Sciences*, April 30, 2009.

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as communities that are dependent on these ecosystems and fisheries.² We currently know of no safe way to reverse this trend, and further acidification poses staggering and dire risks. Reducing carbon dioxide – the primary greenhouse gas and dominant driver of climate change – is the most important thing we can do to curb acidification. There is no substitute.

We further agree that the greenhouse gases emitted from motor vehicles (carbon dioxide, methane, nitrous oxide, and hydrofluorocarbons) cause or contribute to air pollution that endangers public health and welfare. Transportation contributes to just under one-third of the GHGs emitted in the U.S., and curbing these emissions is necessary – even if not sufficient – to mitigate global warming and its attendant risks to health and welfare. We urge the Administrator to move forward with proposing standards under Section 202(a) and, ultimately, other sections of the Act that support regulation of GHGs from major source categories. As we approach the 10-year anniversary of the initial filing of the petition for rulemaking on this issue, it is increasingly clear that action under existing Clean Air Act authority is both warranted and urgent. In many cases, the states have taken the lead on reducing emissions from automobiles and other sources, putting in place comprehensive plans, legislation and regulations that include emissions reduction targets, performance standards, and cap and trade programs. Their leadership provides many valuable lessons that should be considered and built upon as the federal government moves forward with the development of national standards. The threats associated with climate change require comprehensive action from all levels of government.

This proposal heralds a new day at EPA, one that is too long in coming and, we fervently hope, not too late. The dangers associated with climate change are all too real and are upon us. We applaud the agency's decision to recognize this fact and announce its intention to curb the risks associated with greenhouse gas emissions.

We look forward to working with EPA as the agency moves forward in a deliberative way to use its existing Clean Air Act authority in an intelligent and deliberative way to address this critical issue. Thank you for the opportunity to comment and for your leadership.

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² See Cooley, Sarah and Scott Donney, "Ocean Acidification's Impact on Fisheries and Societies: A U.S. Perspective." *Journal of Marine Education*, January 2009.