

April 15, 2004

Environmental Protection Agency
EPA Docket Center (EPA/DC)
Air and Radiation Docket and Information Center, 6102T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attention Docket ID No. OAR-2002-0056

Dear Administrator Leavitt:

On behalf of the Presbyterian Church (U.S.A.) Washington Office, I am writing to express our concerns about the proposed Utility Mercury Reductions Rule. The Presbyterian Church (U.S.A.), whose membership includes approximately 2.5 million people who worship in over 11,000 congregations, recognizes that we are called to be stewards of God's creation.

In 1990, the 202nd General Assembly of the PC(USA) declared,

The new global reality and our faith call us to make environmental justice and stewardship a central concern of our church's mission and to encourage local congregations and presbyteries to link with existing environmental organizations in order to make the most appropriate lifestyle changes as individuals and as a community of faith, and to mobilize at every level for maximum involvement and influence.

In 2002, the 214th General Assembly passed a resolution, "On Cleaning Up Power Plant Pollution," which called on government officials to enforce current clean air laws, resist efforts to abolish or undercut established clean air programs, and to enact new clean air laws for power plants to substantially reduce pollutants that cause smog, acid rain, respiratory disease, mercury contamination, and global warming.

As such, we are concerned that the proposed Utility Mercury Reductions Rule will undercut established clean air programs. Rather than following current law to reduce mercury emissions by 90% by 2008, the proposed rule would delay a significant reduction in mercury emissions until 2018 or later.

We urge you to consider the effect that this ruling will have on our children and on God's creation. EPA should follow the regulations already set out in the Clean Air Act and treat mercury as an air toxin. Mercury pollution should be lowered by 90 percent no later than 2008. If you have any questions or concerns, do not hesitate to contact me or Carolynn Race, Associate for Domestic Poverty & Environmental Issues at (202) 543-1126 or crace@ctr.pcusa.org. Thank you for your time.

Sincerely yours,

The Reverend Elenora Giddings Ivory
Director