

Dear President Obama and EPA Administrator McCarthy,

We, the undersigned environmental, health, labor, faith, farming, and multi-issue advocacy organizations, are writing to you with great concern regarding the EPA's proposed greenhouse gas performance standards for existing power plants, also known as the "Clean Power Plan." Climate change is the issue of our time, and we strongly support your decision to take executive action to reduce greenhouse gas emissions. We also agree that we cannot wait any longer as members of Congress who deny the reality of climate change thwart action on this pressing issue. However, the window to save our planet from climate catastrophe is rapidly closing, so the action you take must be swift and meaningful. As discussed below, the proposed rule falls far short of what is urgently needed, and to the extent that it promotes greater dependence on natural gas, it may actually be counter-productive.

First, the rule sets woefully inadequate targets. Climate scientists have long warned that immediate action to dramatically cut greenhouse gas emissions is necessary to prevent a global temperature rise of more than 2 °C, a level at which serious damage will still occur, and beyond which the worst impacts of climate change cannot be avoided. The proposed rule, which the EPA predicts could reduce carbon dioxide emissions from power plants 30% below 2005 levels by 2030, fails to adequately respond to this threat. According to Climate Action Tracker, an organization made up of scientists affiliated with the Intergovernmental Panel on Climate Change (IPCC), the rule, in combination with other U.S. policies, would achieve an economy-wide greenhouse gas reduction of only about 10% below 2005 levels by 2030. Disturbingly, when compared to levels in 1990—the internationally recognized base year for measuring reductions—the rule would allow total U.S. greenhouse gas emissions to *rise* by 5%. The best science indicates that by 2030 or sooner, developed countries will have to cut greenhouse gas emissions economy-wide by 35% to 65% below 1990 levels to preserve a good chance of avoiding a 2 °C rise in temperature.¹ This rule as written does not constitute the bold action that is desperately needed to avoid climate catastrophe.

The proposed rule, moreover, settles for much too lenient state-level targets. In fact, the EPA's goals in many states are weaker than the targets those states have already set for themselves and expect to meet without any additional action. Although the rule encourages power plants to reduce emissions through technology improvements that boost efficiency, this is not actually required. Many states would be able to comply with the rule's weak carbon dioxide targets by simply running gas-fired power plants more often, an interim measure dependent on reserve capacity, or by trading allowances for emissions with states like California that are already on track to exceed targets set for them by the rule. Another problem is that the rule's targets do not actually limit total emissions, but instead limit the "intensity" of emissions (pounds of CO₂/MWh). Like a diet that limits calories per serving but not the number of servings, such an approach will ultimately fail if emissions are allowed to rise with increased demand. Targets should be based on the total amount of greenhouse gas entering the atmosphere,

¹ B. Hare, M. Lindberg, et al. Below 2 degrees C or 1.5 degrees C depends on rapid action from both Annex I and Non-Annex I countries, *Climate Action Tracker*, Policy Brief, June 4, 2014-revised June 7, 2014 ; see also M. G.J. den Elzen, A. F. Hof, M. Roelfsema, Analysing the greenhouse gas emission reductions of the mitigation action plans by non-Annex I countries by 2020, Netherlands Environmental Assessment Agency, *Energy Policy*, Volume 56, May 2013. <http://www.sciencedirect.com/science/article/pii/S0301421513000426>

or at a minimum contain mass-based backstops, to ensure that aggressive greenhouse gas reduction targets are met.

Second, the proposed rule encourages the expanded use of natural gas from fracking, which could actually make the climate crisis worse. Directly regulating only carbon dioxide emissions from fuel combustion, the proposed rule encourages states to burn natural gas instead of coal for electricity. However, methane, the main ingredient of natural gas, traps 86 times more heat than carbon dioxide over 20 years² – the timeframe during which the proposed rule will operate, and during which scientists say bold action must be taken to prevent climate disaster. Furthermore, several independent studies indicate that at least 3% and potentially as much as 7% of the methane in natural gas is lost to the atmosphere during extraction, processing, and transport – a leakage rate that would make natural gas just as bad or worse than coal as an overall driver of climate change.³ Increased dependency on gas also means more fracking, a known cause of air and water contamination, earthquakes, and a litany of other environmental and human health problems.⁴ Any rule to address climate change must not promote the increased use of gas.

The EPA is legally obligated to take action to reduce leakage from oil and gas production, storage, and transmission. However, while some believe regulations could help address problems associated with methane and fracking, the industry's dominance over U.S. energy policy makes a robust and strictly enforced regulatory regime unlikely. Further, even the absence of any leakage would not make more natural gas production and use a sensible part of any short or long term climate plan. Instead, we must transition rapidly to truly sustainable energy sources. Increased reliance on fracked gas at best significantly delays and at worst may displace solutions such as wind, solar, and energy efficiency altogether.

Third, the rule fails to advance the most promising solution to the climate crisis: renewable energy. This is shocking in light of outstanding improvements that have been made in both wind and solar technology in recent years. Instead of challenging states to maximize the development of renewables, the rule includes weak suggested goals for the amount of power each state should derive from renewable energy based on an averaging of existing programs. Many of those suggested goals are even weaker than what several states have planned, and in some cases already have achieved. In fact, the EPA predicts that the rule as proposed would have virtually no effect on the amount of renewables in 2030 compared to forecasts without the rule. Effectively responding to today's climate crisis demands a rapid transition away from fossil fuels, clear regulatory signals, and robust governmental support. The rule should do everything possible to speed the needed shift to renewable energy by setting technology-forcing targets for 2030 that reflect the maximum level of renewable generation achievable in each state.

² G. Myhre et al., *Anthropogenic and Natural Radiative Forcing*, in CLIMATE CHANGE 2013: THE PHYSICAL SCIENCE BASIS. CONTRIBUTION OF WORKING GROUP I TO THE FIFTH ASSESSMENT REPORT OF THE INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE IPCC Table 8.7 at 714 (Cambridge Univ. Press 2013).

³ Robert W. Howarth, "A Bridge to Nowhere: Methane Emissions and the Greenhouse Gas Footprint of Natural Gas," *Energy Science & Engineering*. April 2014. <http://onlinelibrary.wiley.com/doi/10.1002/ese3.35/pdf>

⁴ Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking (Unconventional Gas and Oil Extraction), *Concerned Health Professionals of New York*, July 10, 2014. <http://concernedhealthny.org/compendium/>

Of course we support your commitment to use executive action to address climate change. However, the EPA's proposed rule falls far short of what is required to meet this challenge. Simply put, we cannot solve the climate crisis if most of our energy continues to come from fossil fuels. Fracked gas is not a solution. Instead of replacing one damaging fossil fuel with another, we urge you to adopt a rule that contains much stronger targets and makes the necessary bold and rapid switch to renewables. Current and future generations depend on it.

Sincerely,

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