

Clean Power Plan: Public Hearing Testimony

Thank you for the opportunity to comment on the EPA's Clean Power Plan. My name is Kate DeAngelis, and I represent Friends of the Earth US. President Obama's proposed limits on carbon pollution represent the most significant step any American president has taken to mitigate climate disruption. It is important to address emissions from the electric power sector because it contributes almost 40 percent of the country's emissions. Despite this, the rule is not stringent enough to force the emission reductions necessary to avoid the worst impacts of global climate disruption. I would like to encourage EPA to make the following changes to strengthen the rule.

First, the reduction targets for each state are woefully insufficient and should be increased. These targets range from too lenient to reductions that would have taken place without the rule. The state targets add up to a national goal that will not avert the worst impacts of climate change. Substantial reductions should be required by 2020 with even greater reductions in the future. Greenhouse gases remain in the atmosphere for decades after they are released so they have a strong cumulative effect. Immediate reductions are more important than future reductions; waiting 15 years is an unacceptable delay. In addition, the base year should be changed from 2005 to 1990 because having 2005 as a baseline takes credit for reductions that have already occurred.

Second, increased reliance on natural gas will not reduce our emissions, but will only continue our dependence on dirty fossil fuels. The climate impacts of natural gas remain unclear and could be as bad as coal. This is because the extraction, processing and transportation of natural gas releases large amounts of methane, which is 86 times more potent than carbon dioxide. The leakage of methane could be a hundred to a thousand times higher than what the EPA estimates, making the climate impacts much worse than currently calculated. Additional natural gas would also require increased fracking. High levels of toxins have been in the air near fracking wells; these toxins cause such health impacts such as headaches and nausea. Fracking also contaminates drinking water with billions of gallons of toxic waste each year and could potentially result in an increase in earthquakes.

Third, a massive shift away from fossil fuels to renewable energy is necessary to avoid the worst impacts of climate change. More ambitious renewable energy targets are achievable. The rule's targets are much lower than what is possible. The majority of states have mandatory or voluntary renewable energy portfolio standards—many of which require more renewable energy than EPA predicts. For example, Missouri's existing clean energy policies have them on track to meet the EPA target by 2021. Moreover, many states have huge renewable energy potential that could meet their entire electricity needs. All states should be required to greatly increase their reliance on clean, renewable energy, such as wind and solar. Those states that have been more ambitious should be forced to go further and coal-dependent states should be forced to make substantial shifts from coal to clean renewable energy.

Finally, the EPA should allow states to implement a carbon tax as a means to comply with the power plant rule. A carbon tax allows states to efficiently reduce their emissions while raising additional revenue. EPA should clarify that states are allowed to implement a carbon tax as a compliance mechanism. EPA has given a strong signal to states that meeting their targets with cap-and-trade will be acceptable, but barely mentions a carbon tax. The rule should explicitly allow a sufficiently robust carbon tax and then discuss how such a tax

would be acceptable, including analysis on the price that would need to be set to result in the required emission reductions and how the carbon tax could be administered.

Thank you for taking the time to listen to my comments. I support the EPA's efforts to address carbon pollution from existing power plants, but encourage the EPA to strengthen the targets so that the rule will result in reductions sufficient to prevent catastrophic climate change.