

December 1, 2014

Dear President Obama:

The environmental, social, economic, and public health threats of climate disruption — both in the United States and around the world — require strong action and leadership from the United States.

While we strongly support the U.S. Environmental Protection Agency's (EPA) limiting carbon pollution from existing power plants, we are deeply concerned that as currently written, the EPA's Clean Power Plan is not commensurate with the magnitude of the climate crisis. While the proposal's aim to reduce carbon emissions from electricity generation by 30 percent from 2005 levels by 2030 is a historic first step, much more aggressive action is needed to avert catastrophic climate change.

On behalf of our millions of members and activists we urge you to put forward a final rule that adequately addresses carbon pollution from our power sector and drives the transformational change required to end our dependence on dirty energy.

**The Clean Power Plan must set more aggressive emissions reduction targets.** Emissions reductions must be consistent with what climate science demands. The emissions targets should be strengthened by increasing energy efficiency and the use of renewables. Energy efficiency is the cheapest, most rapidly deployable solution for reducing carbon emissions. States can cost-effectively achieve stronger energy savings than what the EPA is proposing. Similarly, states can produce more renewable electricity than the EPA has calculated under its proposed plan. Strengthening the carbon rule should start with recognizing the full potential and achievable deployment of energy efficiency and renewable energy.

**The Clean Power Plan should commit to equity, fairness and environmental justice.**

The EPA should conduct an analysis of the potential adverse impacts of its proposed greenhouse gas standards on low-income communities and communities of color, and require states to do the same for their compliance plans. Equity issues should also be addressed by ensuring meaningful participation and engagement of impacted communities in the development and execution of state implementation plans.

**The Clean Power Plan should not encourage the replacement of one fossil fuel with another, but should instead encourage clean, safe renewable energy and increased energy efficiency.** Academic studies question whether natural gas has any significant climate benefit over coal because of the leakage of methane, which is 86 times more potent than carbon dioxide over a 20 year span. Even without taking into account methane leakage, however, natural gas is a fossil fuel that emits greenhouse gas pollution when burned and thus cannot be part of a common-sense solution to climate disruption.

The Clean Power Plan's promotion of natural gas as an alternative to coal would continue our reliance on fossil fuels for many decades and incentivizes more investment in dirty energy infrastructure. Instead, the Clean Power Plan should promote a rapid transition away from fossil fuels towards renewable sources of power, such as wind and solar.

**“Solutions” to reduce global warming pollution must not create or exacerbate other environmental and social problems.** The Clean Power Plan's inclusion of nuclear power, “waste-to-energy”, carbon capture and sequestration, biomass incineration and other dirty fuels

fails to acknowledge adverse environmental and public health impacts. These technologies poison our land, water and public health and cannot be considered clean energy. Guidance for complying with the Clean Power Plan should not promote these false solutions to climate change.

**The Clean Power Plan must protect low-income consumers.** Low-income consumer protections and cost-effective energy are necessary to ensure clean, affordable and reliable electricity. The EPA should provide guidance for states to design energy efficiency, distributed renewable energy programs and other broad-based initiatives that can be implemented with maximum benefits for consumers. And we urge the EPA to work with states and stakeholders to promote processes and programs that will reduce the threat of climate disruption while ensuring that service and affordability is safeguarded for low-income consumers.

**The Clean Power Plan should not encourage cap and trade, and must keep offsets out.** “Cap and trade” schemes allow power plants that are hardest to clean up to carry on polluting. Trading may offer cheaper compliance for polluters, but it means that communities disproportionately burdened by the dirtiest power plants continue to live with the health impacts of co-pollutants. If trading schemes are adopted, carbon offsets from outside the power sector must not count toward compliance with the emission reduction requirements of the Clean Air Act.

**The Clean Power Plan should live up to the United States’ international obligations.** For a fair global deal with meaningful global emissions reductions, the United States must deeply reduce emissions domestically commensurate with its position as the world’s largest historic emitter greenhouse gas emissions. Fulfilling these commitments will be essential to securing an international agreement in Paris in 2015 and effective mitigation action, climate resilience and fair financial support beyond. A rule like the Clean Power Plan with insufficient reductions, delayed timelines, and perverse promotion of natural gas and nuclear power undermines our ability to serve as international leaders on climate disruption. We urge you to strengthen the plan for existing power plants to make it consistent with our historic obligations.

Climate change is the greatest challenge of our time and programs to avert catastrophic climate change must be proportionate with that challenge and ensure all Americans have access to affordable, reliable and sustainable energy and clean air.

Sincerely,

National and International Groups:  
Alliance of Nurses for Healthy Environments  
Aytzim: Ecological Judaism  
Beyond Nuclear  
Center for Biological Diversity  
Center for Environmental Health  
Center for Social Inclusion  
Center for Sustainable Economy  
ClimateMama  
Earthworks  
Energy Justice Network  
Food & Water Watch  
ForestEthics  
Friends Committee on National Legislation  
Friends of the Earth  
Global Alliance for Incinerator Alternatives  
Green America

Greenpeace  
Hip Hop Caucus  
inNative  
Institute for Policy Studies  
Interfaith Moral Action on Climate  
Labor Network for Sustainability  
MoveOn  
Nature Abounds  
Ocean Conservation Research  
Peace Action  
Post Carbon Institute  
Public Citizen  
Rainforest Action Network  
Rising Tide North America  
RootsAction  
Sciencecorps

The Center and Library for the Bible and Social Justice  
The Helen Caldicott Foundation  
The Mothers Project  
Unitarian Universalist Association  
Unitarian Universalist United Nations Office  
US Veterans Clean Energy CoOp  
William C. Velasquez Institute  
Women's International League for Peace and Freedom - US Section

State Groups:

AK

Alaska's Big Village Network  
Alaska Inter-Tribal Council  
Center for Water Advocacy  
Alaska Applied Sciences, Inc.

AZ

G.A.R.D.E.N. Inc.  
Physicians for Social Responsibility, Arizona Chapter

CA

San Luis Obispo Mothers for Peace  
Earth Day Los Angeles  
Rising Tide Southern California  
Environmental Health Trust  
Endangered Habitats League  
Association of bay area governments  
East Bay Community Solar Project  
Local Clean Energy Alliance  
Mercedians Against Fracking

DC Metro Area

BeeHive Collaborative  
Chesapeake Climate Action Network  
Interfaith Power & Light

FL

Hands Across the Sand

GA

Nuclear Watch South

IL

Eco-Justice Collaborative  
Friends of Bell Smith Springs

IA

Allamakee County Protectors  
Iowa River Friends

KY

Kentuckians For The Commonwealth

LA

Advocates for Environmental Human Rights  
Global Green USA  
Gulf Coast Center for Law & Policy

MA

Berkshire Environmental Action Team  
Regional Environmental Council  
Better Future Project  
Massachusetts PipeLine Awareness Network  
No Fracked Gas in Mass  
Shut it down  
EcoLaw Massachusetts  
Lobster Boat Blockade

MD

The Essene Church of Peace  
Calvert Citizens for a Healthy Community  
Climate First!, Inc.  
Crabshell Alliance

MI

Coalition for a Nuclear Free Great Lakes  
Don't Waste Michigan

MN

Save Our Sky Blue Waters

MO

Mid-Missouri Peaceworks/Missourians for Safe Energy  
Fairmont, Peace Group

NC

NC Interfaith Power and Light  
NC WARN  
River Guardian Foundation

NE

Western Nebraska Resources Council  
Bold Nebraska

NJ

350 NJ  
Citizens Climate Lobby NJ Camden Chapter  
Delaware River Keeper

The Mother Project NJ

NY

Center and Library for the Bible and Social Justice

Clean Air Rights for Everyone of NY

Climate Justice at Union Theological Seminary

Empire State Consumer Project

Earth Day New York

Protect Orange County

The Grail Climate Action Circle

Stop the Minisink Compressor Station

Social Ventures

United for Action

WE ACT

OR

Concerned Citizens for Clean Air

Unitarian Universalist Ministry for Earth

Southern Oregon Climate Action Now

Oregonians for Renewable Energy Progress

PA

The Shalom Center

Pennsylvania Alliance for Clean water and Air

Solar Grid Storage

Clean Air Council

TN

Statewide Organizing for Community

Empowerment

UT

Heal Utah

VA

Cloud Light Studio

EcoVillage Charlottesville

Healthy Food Coalition

VT

Vermonters for Sustainable Population

WI

DownRiver Alliance

Frac Sand Sentinel