

June 25, 2012

President Barack Obama  
The White House  
1600 Pennsylvania Avenue  
Washington, D.C. 20500

The Honorable Lisa Jackson, Administrator  
Environmental Protection Agency  
Room 3000, Ariel Rios Building  
1200 Pennsylvania Avenue  
Washington, D.C. 20460

**Attn: Docket ID No. EPA-HQ-OAR-2011-0660. Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility Generating Units**

Dear President Obama and Administrator Jackson:

We, the undersigned groups, on behalf of our millions of members and supporters across the nation, write today to express our strong support for the establishment of protective carbon pollution standards for new power plants issued under the nation's clean air laws. We urge you to finalize these standards as soon as possible and to move swiftly to propose and finalize carbon pollution standards for existing power plants. The carbon pollution standards should ensure that new power plants use the most efficient, lowest-emitting technologies and that emissions from existing power plants are reduced by the amounts that science demands. This goal is achievable because of the availability of cost-effective technologies that are produced in America and create American jobs.

**The need to curb climate-destabilizing pollution from power plants is urgent. The new source carbon pollution standards are a vitally important step towards accomplishing this critical task.**

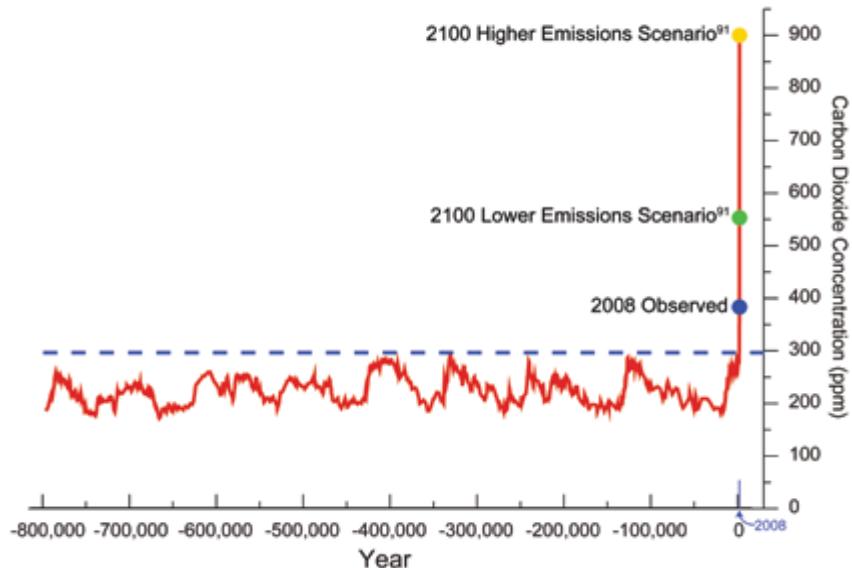
In December of 2009 the U.S. Environmental Protection Agency (EPA) concluded—after reviewing a comprehensive and massive body of peer-reviewed scientific research on climate change—that heat-trapping greenhouse gas emissions may reasonably be anticipated to endanger public health and welfare of both current and future generations.<sup>1</sup> Due to human activities—primarily the combustion of fossil fuels and deforestation—the concentration of these gases in the atmosphere is rapidly rising. Atmospheric carbon dioxide (CO<sub>2</sub>) levels have increased by approximately 38% since the Industrial Revolution; current atmospheric

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<sup>1</sup> See Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, 74 Fed. Reg. 66,496 (Dec. 15, 2009) (to be codified at 40 C.F.R. ch. I).

concentrations of both CO<sub>2</sub> and methane (an even more potent greenhouse gas) are significantly higher than they have been for the last 800,000 years.<sup>2</sup>

### 800,000 Year Record of Carbon Dioxide Concentration



This chart shows CO<sub>2</sub> concentrations in the atmosphere over the last 800,000 years, based upon analyzing air bubbles trapped in an Antarctic ice core. It also shows that unless we curb greenhouse gas emissions atmospheric CO<sub>2</sub> concentrations will likely double or triple by the end of this century.<sup>3</sup>

The increase in the amount of solar radiation that is trapped in the earth's atmosphere is causing average global temperatures to rise. Global temperature records independently assembled by NOAA, NASA, and the United Kingdom's Hadley Center indicate that global mean surface temperatures have risen by  $1.3 \pm 0.32^{\circ}\text{F}$  over the past 100 years (1906-2005), with the greatest warming occurring during the past 30 years.<sup>4</sup>

<sup>2</sup> See U.S. ENVTL. PROT. AGENCY, TECHNICAL SUPPORT DOCUMENT FOR ENDANGERMENT AND CAUSE OR CONTRIBUTE FINDINGS FOR GREENHOUSE GASES UNDER SECTION 202(a) OF THE CLEAN AIR ACT ES-1 to -2 (2009); Kenneth L. Denman et al., *Couplings Between Changes in the Climate System and Biogeochemistry*, in INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, CLIMATE CHANGE 2007: THE PHYSICAL SCIENCE BASIS, at 512 (S. Solomon et al. eds., 2007); Piers Forster et al., *Changes in Atmospheric Constituents and in Radiative Forcing*, in CLIMATE CHANGE 2007, *supra*; Eystein Jansen et al., *Paleoclimate*, in CLIMATE CHANGE 2007, *supra*; THOMAS R. KARL ET AL., U.S. GLOBAL CHANGE RESEARCH PROGRAM, GLOBAL CLIMATE CHANGE IMPACTS IN THE UNITED STATES (2009).

<sup>3</sup> U.S. GLOBAL CHANGE RESEARCH PROGRAM, *supra* note 2, at 13.

<sup>4</sup> See Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, 74 Fed. Reg. at 66,522; U.S. ENVTL. PROT. AGENCY, *supra* note 2, at ES-2, -28 to -29; Gabriele C. Hegerl, *Understanding and Attributing Climate Change*, in CLIMATE CHANGE 2007, *supra* note 2, at 683.

**Climate change presents severe risks to the health and well-being of Americans. If carbon pollution is unchecked, the economic and welfare costs of intensifying climate impacts will be profound.**

The United States Global Change Research Program has determined that if carbon pollution emissions are **not** reduced it is likely that American communities will experience increasingly severe and costly climate impacts, including:

- Rising levels of dangerous smog in cities—which will lead to an increased risk of respiratory infections, more asthma attacks, and more premature deaths;
- Increased risk of illness and death due to extreme heat;
- More intense hurricanes and storm surges;
- Increased frequency and severity of flooding;
- Increases in insect pests and in the prevalence of diseases transmitted by food, water, and insects;
- Reduced precipitation and runoff in the arid West;
- Reduced crop yields and livestock productivity; and
- More wildfires and increasingly frequent and severe droughts in some regions.<sup>5</sup>

**Climate science indicates that it is necessary to make deep cuts in the amount of carbon pollution emitted—which will require major reductions in power sector emissions.**

The National Research Council's 2011 report on climate stabilization concurs that steep emission reductions, on the order of 80% globally, are necessary to stop CO<sub>2</sub> concentrations in the atmosphere from reaching dangerous levels.<sup>6</sup> Cutting emissions from the power sector will be a necessary component of these emissions cuts, as the U.S. power sector is responsible for approximately 40% of U.S. carbon emissions<sup>7</sup> and 7% of global greenhouse gas emissions.<sup>8</sup>

**America has the resources and the technologies needed to sharply reduce power sector carbon pollution.**

The standards should ensure that new power plants use the most efficient, lowest-emitting technology available, and reflect the emission rates achievable by state-of-the-art combined cycle natural gas plants. Standards issued for existing power plants should achieve the pace and scope of emission reductions that science demands and that proven, cost-effective technologies readily enable.

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<sup>5</sup> U.S. GLOBAL CHANGE RESEARCH PROGRAM, *supra* note 2, at 8-109.

<sup>6</sup> NAT'L RESEARCH COUNCIL, CLIMATE STABILIZATION TARGETS 10 (2011) (excerpt attached as Ex. A). For full report please see: [http://www.nap.edu/catalog.php?record\\_id=12877](http://www.nap.edu/catalog.php?record_id=12877).

<sup>7</sup> U.S. ENVTL. PROT. AGENCY, INVENTORY OF U.S. GREENHOUSE GAS EMISSIONS AND SINKS: 1990-2010, at ES-4 tbl.ES-2 (2012).

<sup>8</sup> *Environmental Indicators—GHGs*, U.N. STATISTICS DIV., [http://unstats.un.org/unsd/environment/air\\_greenhouse\\_emissions.htm](http://unstats.un.org/unsd/environment/air_greenhouse_emissions.htm) (last updated July 2010).

Carbon pollution standards for new and existing power plants will further the progress we are making towards a cleaner, more secure, and more independent future for energy in America. These standards can ensure that we will use our nation's electricity resources more efficiently to cut energy costs for American families and businesses, mobilize American innovation, technologies, and fuels for cleaner energy generation, and ensure that America is at the cutting edge of the clean energy economy of the future.

Sincerely,

Citizens for Pennsylvania's Future (PennFuture)  
Clean Air Task Force  
Clean Water Action  
Climate Solutions  
Conservation Law Foundation  
Earthjustice  
Environment America  
Environment Northeast  
Environmental Defense Fund  
Greenpeace USA  
Health Care Without Harm  
Interfaith Power and Light, The Regeneration Project  
League of Conservation Voters  
Moms Clean Air Force  
National Wildlife Federation  
Natural Resources Defense Council  
New Jersey Audubon  
NW Energy Coalition  
Oregon Environmental Council  
Physicians for Social Responsibility  
Powder River Basin Resource Council  
Renewable Northwest Project  
Safe Climate Campaign  
Sierra Club  
Southern Alliance for Clean Energy  
The Center for the Celebration of Creation  
The Climate Reality Project  
US Climate Action Network  
Washington Environmental Council  
Western Environmental Law Center  
Western Resource Advocates  
WildEarth Guardians