This summer, the Obama administration and the U.S. Environmental Protection Agency (EPA) finalized the Clean Power Plan—the first-ever carbon pollution safeguards for the nation. These safeguards will protect our air, our water, our climate, and the health of our communities. The Clean Air Act directed the Environmental Protection Agency to set national clean air standards—in this case, standards for carbon pollution from the nation’s existing fossil fuel-fired power plants—and the Supreme Court upheld this directive. This plan gives states the first shot at developing and implementing these standards in a way that’s best for them, by writing state-specific pollution control plans tailored to local conditions. The Clean Power Plan gives states the flexibility to decide the appropriate pollution reduction measures to meet the standard.

There is every reason for a state to develop its own plan that takes into account its own unique circumstances, and most states will choose to develop and implement pollution reduction programs based on that knowledge to comply with the Clean Power Plan. The EPA assists state efforts by providing technical and policy guidance. They must also review and approve state plans to ensure that the plans comply with the Clean Power Plan guidelines set out by EPA and the Clean Air Act as a whole. If a state fails to adopt and implement an adequate plan, EPA is required to issue and enforce a Federal Implementation Plan (FIP). States may also choose to accept a federal plan as an alternative to developing their own plan. EPA has issued for comment a proposed model federal plan and model trading rules that states could adopt for state plans. Before issuing a federal plan for any one state, EPA would need to propose and take comment on a federal plan specifically for that state, but the model plan will serve as the template.
Sierra Club’s position is that in order to ensure the draft model FIP is strong and just, EPA must:

1. Ensure the carbon pollution standards in the model federal plan achieve the pollution reductions promised in the final Clean Power Plan, or even further reductions

2. Ensure that states address potential carbon pollution from new power plants to achieve overall electric sector reductions in carbon pollution

3. Protect low-income consumers by maximizing utilities’ incentives to invest in energy efficiency, which lowers household energy bills.

4. Ensure that the model federal plan protects and benefits minority, low-income, and indigenous communities that have long borne the brunt of fossil fuel pollution, and are likely to experience the worst impacts of climate disruption.

5. Resist giveaways of allowances to polluting sources.

Fossil-fuel fired power plants are the largest source of carbon pollution, and are thus a major contributor to climate change. Carbon emissions from power plants represent 40 percent of the total CO2 emissions emitted in the United States. Power plants also emit conventional and toxic air pollutants that contribute to respiratory and heart diseases, as well as premature death.

In addition to being a public health issue, climate change is also a human rights issue. Communities across the globe are dealing with the devastating effects—from families displaced from their homes due to extreme weather events, to children suffering from the health impacts of poor air quality. By implementing these safeguards, the Clean Power Plan will lead to significant climate and public health benefits for all. EPA has estimated that, by 2030, the Clean Power Plan will prevent 150,000 asthma attacks and up to 6,600 premature deaths annually.

The Clean Power Plan also provides great opportunities for economic growth and sustainable development. Investing in clean energy will create jobs and fuel economic growth in our country. The EPA estimates the Clean Power Plan will deliver annual benefits of up to $93 billion by 2030.

The Clean Power Plan will clean up our air and address climate disruption, while also modernizing how we power our country and our economy, spurring innovation and creating thousands of jobs and billions of dollars in new investments.

Tell the EPA you support a strong and just Federal Implementation Plan to ensure the United States can lead on climate and protect our communities from climate disaster at sc.org/CPPFIPComments.