



Toolkit for Christian Community Engagement in the Implementation of the Clean Power Plan

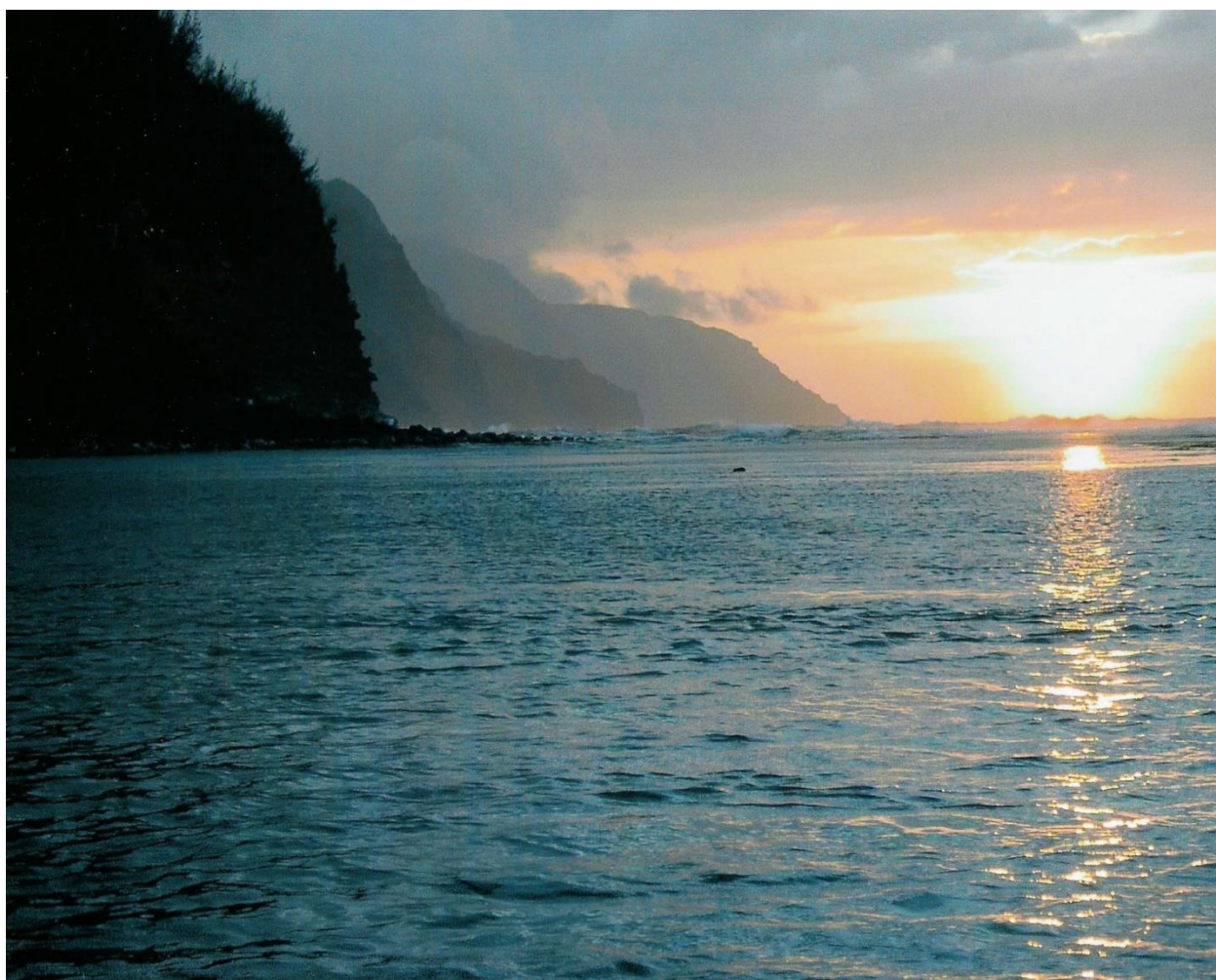


Photo by Chuck Moore
Random Snaps Photography

Creation Justice Ministries is grateful to Ruth Ivory-Moore for her extraordinary volunteer leadership as the author of this toolkit.

Table of Contents

| | Page |
|--|------|
| I. Executive Summary | 4 |
| II. The Christian call to participate in CPP implementation | 7 |
| III. CPP Background | 7 |
| A. General | |
| B. Legislative/Legal History | |
| C. CPP Summary and Relationship to Other Rules | |
| D. Applicability | |
| E. State Implementation Plan (SIP) decisions | |
| F. Federal Implementation Plan (FIP) | |
| G. Basis for EPA's goals | |
| H. Compliance dates | |
| IV. Clean Energy Incentive Program | 14 |
| V. Faith Principles incorporated in SIPs and FIPs | 16 |
| A. Stewardship | |
| B. Sustainability | |
| C. Sufficiency | |
| D. Justice | |
| VI. Benefit of Effective Engagement in SIP and FIP development | 19 |
| A. Health | |
| B. Environmental conditions | |
| C. Climate equity | |
| VII. SIP and FIP process engagement strategies | 21 |
| A. Environmental Justice Assessment/Incorporation | |
| B. Preparation/Scoping | |
| C. Identify Criteria grassroots/grasstops advocacy efforts | |
| 1. Development of the SIP. | |
| 2. FIP rule finalization | |
| 3. Education of state and community constituents | |
| 4. Get to know the community | |
| 5. Define success/impactful engagement | |
| 6. Suggested engagement strategies | |
| VIII. Resources and Tools | 26 |
| IX. Glossary of key Terms | 27 |
| X. Appendix | 30 |
| Figure 1: Impact of Climate Change on Health | 31 |
| Figure 2: Impact of Climate Change on Geographical Regions of the United States | 32 |
| Attachment I: Organization Welcome Letter | 34 |
| Attachment II: Writing Letters to Editors and Congress or State Representatives | 35 |

| | | |
|------------------|--|----|
| Attachment III: | Letter to Legislature, Suggested Outline | 36 |
| Attachment IV: | Letters to the Editor and Op-Ed Articles | 37 |
| Attachment V: | Op-ed Articles | 38 |
| Attachment VI: | Social Media Advocacy | 40 |
| Attachment VII: | Tips for Preparing Your Testimony | 41 |
| Attachment VIII: | Tips Generic Sample Talking Points and Testimony Document for the Clean Power Plan | 42 |
| Table I: | States' Status on Implementation of the Clean Power Plan Post U.S. Supreme Court Stay of the Rule (Source E&E News Power Plan Hub as of 2/22/16) | 44 |
| References | | 46 |

II. Executive Summary

Creation Justice Ministries' mission is to educate, equip and mobilize Christian communions/denominations, congregations and individuals to protect, restore, and rightly share God's Creation. Based on the priorities of its members, with a particular concern for the vulnerable and marginalized, Creation Justice Ministries provides collaborative opportunities to build ecumenical community; guides people of faith and faith communities towards eco-justice transformations; and raises a collective witness in the public arena echoing Christ's call for just relationship among all of Creation. God created the heavens and earth (the fauna, flora, and all its elements needed for subsistence). Then He created human beings, assigning them to be caretakers of the earth and all its resources. (Genesis 1-2:3). As noted by the Intergovernmental Panel on Climate Change (IPCC), the activities of human beings are damaging earth, causing its temperature to rise resulting in climate change.

The IPCC attributes climate change to be primarily the result of human activity which causes increased amounts of carbon dioxide and other greenhouse gases in the atmosphere. Climate change damages God's creations (society and ecosystems) in a broad array of ways. The damages include rainfall changes, extreme weather patterns, droughts, adverse influence on agricultural crop yields, negative human health impacts, changes to forests and other ecosystems—which are disproportionately felt and shouldered by the vulnerable citizens.

As Christian communities, we receive a call to be caretakers of God's creation from the Bible. Creation is a major theme in the Bible from Genesis 1:1 through Revelations 21:1. Protection and caring for God's creation is a role assigned to Christians, and not to be taken lightly. Christians should be in the forefront in caring for creation. In Genesis 1:28, 29, God gave humans the charge to care for the creation. Paul in his letter to the Colossians links Christ and creation. Christ was there at the Creation as the Son; and Christ sustains all Creation.

(Colossians 1: 15-23). Since the Christian's work is to be Christ centered, the role as caretaker of God's creation is reinforced.

Creation Justice Ministries is acutely aware of the threats posed by changing climate and understands being idle on the sidelines is not an option. With a sense of urgency, action must be taken, but it must be strategically planned. Creation Justice Ministries applauds the significant action taken by the Environmental Protection Agency's (EPA) in August 2015 to begin to mitigate the consequences of climate change by issuing the Clean Power Plan (CPP) rules. The CPP once fully implemented reduces emissions of carbon dioxide, CO₂, (the most potent long term greenhouse gas) from power plants that are the largest emitters of these emissions in the United States. The EPA predicts the CPP will reduce CO₂ emissions 32% below 2005 levels by 2030.

Of particular note, The CPP rule is being challenged by numerous states and trade associations in the courts. The United States Supreme Court recently issued a stay in the implementation of the rule pending resolution of all judicial proceedings. Creation Justice Ministries remains supportive of the EPA as it defends CPP rule in the litigation. Despite the judicial stay, many states are proceeding with the developing the CPP state implementation Plan (SIP). Therefore the SIP development process remains a meaningful and timely point in time for engagement with local, state and federal officials to encourage continued progress toward mitigation and reduction of damage to God's creation.

This "Creation Justice Ministries Advocacy Plan Toolkit for Engagement in the Implementation of the Clean Power Plan" (Toolkit) provides the framework for the faith based community's engagement in the CPP SIP process for both the states that are currently forging forward; and for those that will engage again post judicial resolution. The Toolkit provides the

framework for advocacy for facilitating stewardship of God's creation; fostering sustainability for future generations; encouraging energy conservation ensuring sufficiency for all; and creating means for equity and justice such that no groups are disproportionately impacted by climate change.

The Toolkit highlights the flexibility the CPP affords the states; key decisions each state must make; compliance timetables; and provides the bases for development of a comprehensive advocacy strategy. To assist with the communication on behalf with the appropriate entities the toolkit includes a wide gamut of aides as guidance for writing op-ed articles and letters to elected officials; key points for successful testimony; community engagement questions; and social media usage.

The Toolkit is not prescriptive, but highlights those touch points in the CPP that allows states flexibility that the faith based community should be mindful of to be sure that the state plan is not developed with the vulnerable population shouldering the brunt of the compliance strategies.. It also provides a framework for engagement in the process to educate, equip and mobilize Christians to action for mitigating the harms to God's creation caused by climate change.

III. The Christian call to participate in CPP implementation

Christians are called to responsibly steward the gifts of creation while protecting our vulnerable citizens and the earth's resources. (Genesis 1:28, 29) The impacts of climate change are far-reaching. "Together with other natural and human-made health stressors, climate change influences human health and disease in numerous ways. Some existing health threats will intensify and new health threats will emerge. Not everyone is equally at risk. Important considerations include age, economic resources, and location."¹ (See Figure 1.) The world population is witnessing rising floodwaters, severe droughts, disrupted access to food, harsh storms, higher rates of asthma, and increased vector-borne diseases. Climate change is most harming to the vulnerable among us: people living in poverty, older adults, and people living in countries least responsible for contributing to climate change.

The faith based communities are on the front lines of providing relief and aid to those bearing the unequal burden of climate change. Now, with the CPP, there is an opportunity to minimize suffering by limiting a major contributor to climate change: CO₂ pollution from power plants in the United States.

Each Christian fellowship, denomination, or communion has their own set of principles and policies that explain why they are compelled to care for and do justice for God's creation. We encourage Christians to deepen their knowledge of their own tradition.

IV. CPP Background

A. General

Scientists generally agree that climate change results from both natural and human causes, but that since the mid-20th century the dominate factor in climate change, that is, the earth warming is due to human caused greenhouse gas emissions. Greenhouse gases (GHGs)

like water vapor (H₂O), carbon dioxide (CO₂), and methane (CH₄) absorb energy, slowing or preventing the loss of heat to space. In this way, GHGs act like a blanket, making the Earth warmer than it would otherwise be, the “greenhouse effect.” Carbon dioxide is the primary greenhouse gas that is contributing to recent climate change.² According to the EPA, power plants are by far the largest domestic stationary source of emissions of CO₂. Climate change is harming the vulnerable among us: people living in poverty, the elderly, and people living in countries least responsible for contributing to climate change.

Implementation of the CPP affords an opportunity to minimize the suffering caused by climate change. Upon full implementation of the CPP, CO₂ emissions are projected by the EPA to be reduced by 32% below 2005 levels by 2030.

B. Legislative/Legal History.

In December 2010, the EPA entered into a settlement agreement to issue New Source Performance Standards (NSPSs) for greenhouse gas (GHG) emissions from new electric generating units (EGUs) under Section (§) 111(b) of the Clean Air Act (CAA) and emission guidelines under Section 111(d) covering existing EGUs^{3,4}. The agreed upon dates in the settlement agreement were not met, but addressing climate change is a major objective of President Obama’s administration. In June 2013 President Obama released the Climate Action Plan that contained a reference to the issuance of a presidential memorandum. The memorandum directed the EPA to develop, propose and finalize rules for addressing carbon dioxide emissions from existing power plants under the CAA §111(d) and rules for new power plants under CAA §111(b).

After issuing the rule proposals, receiving and considering a historic number of comments, the EPA on August 3, 2015 announced two final rules (the rules for new, modified

and reconstructed power plants under CAA §111(b) and the Clean Power Plan (CPP) rules for existing power plants under CAA §111(d)). The USEPA also issued proposed model rules for a federal implementation plan.

C. CPP Summary and Relationship to Other Rules

On August 3, 2015 the EPA announced the finalization of CPP for existing power plants, a state-based program under CAA §111(d) for existing sources. EPA established final emission guidelines for states to follow in developing plans to reduce GHG emissions from existing fossil fuel-fired electric generating units (EGUs). The EPA established CO₂ emission performance rates based on what the agency deems as the best system of emission reduction (BSER) for two subcategories of existing fossil fuel-fired EGUs—fossil fuel-fired electric utility steam generating units and stationary combustion turbines.⁵ The Clean Power Plan once fully implemented is predicted by the Administration to reduce carbon dioxide emissions by 32% below 2005 levels by year 2030.

D. EPA also finalized the Carbon Pollution Standards for New, Modified and Reconstructed Power Plants under CAA Section 111(b) establishing standards of performance to address CO₂ emissions from new, modified and reconstructed power plants. **Applicability**

The CPP applies to affected electric generating units (EGUs) in 47 states. Vermont and the District of Columbia do not currently have any affected EGUs. EPA felt that it did not have sufficient information or data to determine what is the best system of emission reduction in the Alaska, Hawaii, and in the territories of Guam and Puerto Rico.⁶ These states and territories will be addressed at a later date. EPA set interim and final CO₂ emission performance rates for two subcategories of fossil fuel-fired EGUs:

- Fossil fuel-fired electric steam generating units (generally, coal- and oil-fired power plants); and
- Natural gas-fired combined cycle generating units.

There are different performance rates for coal versus natural gas fired EGUs. EPA established interim and final statewide goals in three forms:

- A rate-based state goal measured in pounds per megawatt hour (lb/MWh);
- A mass-based state goal measured in total short tons of CO₂; and
- A mass-based state goal with a new source complement measured in total short tons of CO₂.⁷

E. CPP State Implementation Plan (SIP)

States must decide whether they should measure compliance with an emission rate target (pounds of CO₂ per MWh) or a mass-based target (tons of CO₂). EPA provides both targets in its final rule.⁸

The CPP allows the States to decide between two types of state compliance plans, described by EPA as (1) an “emission standards” approach and (2) a “state measures” approach. States may choose between two plan types, expressed as emission rate or mass, to meet their goals:

- Emission standards plan – includes source-specific requirements ensuring all affected power plants within the state meet their required emission performance rate- or a mass-based equivalent.
- State measures plan – includes a mixture of measures implemented by the state, such as renewable energy standards and programs to improve residential energy efficiency that are not included as federally enforceable components of the plan. The plan would include a backstop of federally enforceable standards on affected power plants that fully

meet the emission guidelines and that would be triggered if the state measures fail to result in the affected plants achieving the required emissions reductions on schedule.

States may also elect to use the proposed FIP model rule.⁹

Both plans can be either rate-based or mass-based. The final CPP allows each state flexibility in how it meets emission reduction goals. Each state is allowed to take advantage of emissions trading to lower the overall carbon intensity of electricity generation. Generators can purchase compliance credits from entities inside or outside their state that offset carbon emissions, including zero-carbon renewable power producers. But trading can only be done on the same metric. That is, rate-based cannot trade with mass-based.

The CPP also establishes state-specific interim and final goals for each state, based on these limits and each state's mix of power plants. The goals are expressed in two ways—rate-based and mass-based—either of which can be used by the SIP. See <http://www.epa.gov/cleanpowerplanttoolbox/clean-power-plan-state-specific-fact-sheets> for state-specific fact sheets the 47 states subject to the CPP. Each fact sheet shows the state's interim and final carbon dioxide emission performance goals (expressed in both rate and mass).

All state plans must include the following components:

- Description of the plan;
- Applicability of state plans to affected EGUs;
- Demonstration that the plan submittal is projected to achieve the state's CO₂ emission performance rates or state CO₂ goal;
- Monitoring, reporting and recordkeeping requirements for affected EGUs;
- State recordkeeping and reporting requirements;
- Public participation and certification of hearing on state plan; and

- Supporting documentation.

Also, in submitting state plans, states must provide documentation demonstrating that they have considered electric system reliability in developing their plans. Further, in this final rule, the EPA is requiring states to demonstrate how they are meaningfully engaging all stakeholders, including workers and low-income communities, communities of color, and indigenous populations living near power plants and otherwise potentially affected by the state's plan. In their plan submittals, states must describe their engagement with their stakeholders, including their most vulnerable communities.¹⁰

(Note: See Table I for a Status of States' progress on SIP development.)

F. Federal Implementation Plan (FIP)

For states that submit SIPs that the EPA deems to be inadequate and the agency issues a disapproval, the CAA mandates that the EPA issue a FIP, a proposed model trading rule. On the same date the EPA announced the issuance of final rules for existing and new power plants the Agency also proposed a mass- and rate-based federal plan, which would come into play for states that do not submit approved plans under the CPP. EPA initially indicated that it would finalize a single plan. EPA plans to issue the FIP in the summer of 2016.

G. Basis for EPA Goals

EPA compiled 2012 CO₂ emissions and electricity generation data from each affected EGU in each state. Then EPA divided the states into three regions -- the Eastern Interconnection, Western Interconnection and Electric Reliability Council of Texas. EPA divided the states into three regions, aggregating the CO₂ emission and electricity generation data. Next, EPA applied three "building blocks" to the aggregated regional data analyzing such parameters as heat rate improvements, steam

generation from coal units and effect of increases in renewable energy generation. The three building blocks are:

- Improving heat rate at affected coal-fired steam EGUs.
- Substituting increased generation from lower-emitting existing natural gas combined cycle units for generation from higher emitting affected steam generating units.
- Substituting increased generation from new zero-emitting renewable energy generating capacity for generation from affected fossil fuel-fired generating units.¹¹

H. Compliance Dates (These compliance dates are the dates based on the rule as issued on August 3, 2015, before the United States Supreme Court issued its stay on February 10 , 2016. The compliance dates will be revised pending the results of resolution of all judicial proceedings.)

The compliance dates are listed below:

- December 22, 2015 - Rule effective date.
- September 6, 2016 -- The initial SIPs along with any extension requests are due. In

order for the extension of time to be granted, the initial submittal must address three components sufficiently to demonstrate that the state is able to undertake steps necessary to submit a final plan by September 6, 2018:

- An identification of the final plan approach or approaches under consideration, including a description of progress made to date;

- An appropriate explanation for why the state needs additional time to submit a final plan; and
 - A demonstration of how the state has been engaging with the public, including vulnerable communities, and a description of how it intends to meaningfully engage with community stakeholders during the additional time.
- September 6, 2017 – Status update for states with extensions.
 - September 6, 2018 – State plans due for all states that received an extension.
 - September 6, 2019 – EPA approvals of SIPs are due within one year of state submittal.
 - July 21, 2021 – Status Reports due.
 - January 1, 2022 – The CPP provides for an interim compliance period which begins in 2022. Facilities must begin working toward an average emissions rate for the 2022-30 period in 2022. EPA broke the interim emissions rate into two-year "step" periods for 2022-24, 2025-27 and 2028-29. States must either reach a specific emissions rate for each of those periods or set their own steps and explain how they will achieve them. The steps must equate to an average interim emissions rate, which EPA has assigned.
 - January 1, 2030 - The final requirements must be met.

V. **Clean Energy Incentive Program**

EPA's final rule includes a Clean Energy Incentive Program (CEIP) that encourages states to support energy efficiency measures and renewable energy projects two years before the emission rate or emission compliance obligations begin (i.e., in 2020 and 2021). States would

need to include particular design elements in their final plans in order to participate in the CEIP. The CEIP establishes a system to award credits to energy efficiency projects in low-income communities and renewable energy projects (only wind and solar) in participating states. The credits take the form of emission rate credits (ERCs) or emission allowances, depending on whether a state uses an emission rate or mass-based target, respectively. The credits could be sold to or used by an affected emission source to comply with the state-specific requirements (e.g., emission rate or mass-based targets).

Renewable energy projects would receive one credit (either an allowance or ERC) from the state and one credit from EPA for every two MWh of solar or wind generation. EE projects in low-income communities would receive double credits: For every two MWh of avoided electricity generation, EE projects will receive two credits from the state and two credits from EPA. EPA will match up to the equivalent of 300 million short tons in credits during the CEIP program life.⁸⁸ The amount of EPA credits potentially available to each state participating in the CEIP depends on the relative amount of emission reduction each state is required to achieve compared to its 2012 baseline. Thus, states with greater reduction requirements would have access to a greater share of the EPA credits.

To generate the credits, states would effectively borrow from their mass-based or rate-based compliance targets for the interim 2022-2029 compliance period. EPA would provide its share of credits from a to-be-established reserve. In its proposed rule for the federal implementation plan EPA is asking for comments on the size of the credit reserve and other CEIP implementation details.¹²

VI. Faith Principles for incorporation in State Implementation Plans (SIPs) as well as our nation's Federal Implementation Plan (FIP)

In collaboration with other religious partners from Catholic, Jewish, and other Christian communities, Creation Justice Ministries has crafted the following principles for any SIP or FIP.

i. Stewardship

As Christians, we have an understanding that creation belongs to God, not us. We are stewards, not owners. (Genesis 1:28,29; Genesis 2:15; Psalm 104:28-30; Psalm 145:10; 150:6) The faith based community views implementation of the CPP as an opportunity to preserve and protect our environment for future generations. Understanding that creation includes all people, animals and plants, we have a responsibility to be caretakers of our climate, our air, our water, and our entire natural world. (Psalm 65:9-13) To reach our goal of stewardship, we require that implementation plans:

1. Give preference to technologies and processes that mitigate the emission of harmful greenhouse gases and prioritize clean, renewable energy sources;
2. Follow the recommendations of the best available science, provide reductions that help stabilize global temperatures as well as eliminate other pollutants harmful to human health;
3. Implement a plan that will ambitiously fulfill our call to be stewards of the land, and minimize the harmful impacts of energy development on the land, water, and air;
4. Manage the resources available to us in a responsible and safe manner; and

5. Move toward those sources that renew and replenish the earth and all that is in it.

ii. Sustainability

Our faith calls us to ensure that efforts made to reduce carbon emissions empower further initiatives to improve our air and mitigate the effects of climate change. As people of faith, our lives are guided by the principle of sustainability in the cultivation and maintenance of a healthy and abundant planet. We believe that it is up to each of us to ensure that this abundance meets the needs of current and future generations. (Leviticus 25:23) To reach our goal of sustainability, we require that implementation plans:

1. Foster sustainable energy use by individuals, organizations, corporations, and communities;
2. Invest in renewable energy, support policies that lift up clean technologies, and provide economic incentives for forward-thinking and sustainable programs; and
3. Invest in modernizing our energy infrastructure and create a reliable and efficient grid that is sustainable for all God's children now and for generations to come.

iii. Sufficiency

Our Christian faith calls us to gratitude for what God has given us, and calls us away from idolizing Mammon, the false god of greed. (Psalm 148) We encourage a shift in how we use and share, both as individuals and states, God's gifts of energy and air. Understanding that we cannot achieve significant reductions in emissions without a change in lifestyle and fossil fuel

consumption, there is a need for policies and plans that address this growing pattern of overconsumption. To reach our goal of sufficiency for all, we require that implementation plans:

1. Encourage the conservation of energy in our homes, our communities, our businesses and our houses of worship; and
2. Encourage utility companies to conserve energy in the production and distribution of power through innovative and sustainable technologies

iv. **Justice and equity**

As Christians, we believe all people are children of God who deserve to equitably share in His abundant gifts. ([Proverbs 14:31; 19:17; 21:13; 29:7; 31:9](#)) Yet, the burden of climate change, air pollution, and energy inequity falls disproportionately on people living in poverty, communities of color, and our children. It is immoral to build our energy infrastructure on the agony and death of our neighbors. Christian communities will not remain silent as we continue to lose lives to injustice in our energy system. We aim for just plans that account for the poor and vulnerable and acknowledge the need for states to provide an equitable energy future. To reach our goal of justice, we require that implementation plans:

1. Prevent further harm to human health and all of creation by transitioning to clean energy sources as quickly as possible;
2. Include mechanisms to ensure just transitions from carbon intensive industries to clean energy jobs and other career options for workers who have dedicated their lives to providing energy for Americans;
3. Ensure that utility companies do not unduly transfer costs of upgrading to cleaner energy sources to consumers and include provisions for low-

income households to guarantee no economic hardship comes from this transition; and

4. Work to eliminate disproportionate health impacts from pollution on marginalized communities;
5. Take surrounding communities and potential health risks into account when locating sites for energy development;
6. Avoid strategies that may create “hot spots” of carbon dioxide and other pollutants in low income and vulnerable communities; and
7. Provide vulnerable communities the resources to become resilient to the impacts of severe weather and disasters, and as these disasters become more frequent, equip individuals and communities to respond and persevere.

VII. Benefit of Effective Engagement in SIP and FIP development

Scientists generally agree that the earth is getting warmer as are result of GHG emissions largely from man’s activities. Greenhouses (such as carbon dioxide and methane) from industrial activities contribute significantly to the formation of a blanket over the earth trapping energy and preventing heat from escaping. Carbon dioxide emissions stay in the air indefinitely, thereby preventing heat from escaping, creating global warming—climate change. The climate change impacts on society and the ecosystems are far reaching.

i. Health

The Center for Disease Control (CDC) sees climate change, together with other natural and human-made health stressors, as influencing human health and disease in numerous ways.

Some existing health threats will intensify and new health threats will emerge. Not everyone is equally at risk. Important considerations include age, economic resources, and location.

In the U.S., public health can be affected by disruptions of physical, biological, and ecological systems, including disturbances originating here and elsewhere. The health effects of these disruptions include increased respiratory and cardiovascular disease, injuries and premature deaths related to extreme weather events, changes in the prevalence and geographical distribution of food- and water-borne illnesses and other infectious diseases, and threats to mental health.¹³ (See Figure 1.)

ii. Environmental Conditions

The EPA states that climate change affects the rainfall (its increase or decrease), influences agricultural crop yields, affects human health, causes changes to forests and other ecosystems, or even impacts our energy supply. Climate-related impacts are occurring across regions of the country and across many sectors of our economy likely to include more variable weather. Stronger and longer heat waves, more frequent extreme weather events such as flooding and tropical cyclones, rises in sea level, and increased air pollution will become more the rule than the exception.¹⁴ See Figure 2.

iii. Climate equity

Climate change disproportionately impacts the vulnerable, poor, young and elderly. Actions to address climate change must simultaneously address climate impacts. Reducing emission must be seen as intertwined with broader equity issues involving livelihoods, health, food security, and energy access. The well being of people and communities must be at the focal points of actions to combat, mitigate and reduce climate change. Climate equity is multi-

dimensional which includes: human development; economic capacity, consideration of the relative costs of climate action; resilience to climate impacts, including physical security and capacity to adapt in the face of climate change; and governance capacity and social support structures.¹⁵

VIII. SIP and FIP process engagement strategies

A. Environmental Justice Assessment/Incorporation

Some of the states are beginning the process of developing their SIPs to meet the September 6, 2016 milestone compliance date. See Table I. The EPA is reviewing comments and is in the process of finalizing the proposed FIP. It is critical for the faith based community to be at the table now with those implementing the CPP and finalizing the FIP. The faith based community must provide input and form relationships of trust with the goal being to assure equity and that the vulnerable are not disproportionately impacted, while simultaneously protecting resources and the ecosystems. Incorporating environmental justice into strategies to reduce health disparities involves identifying the root causes of social inequalities, building upon community democratic decision-making processes, and identifying environmental health hazards—and connecting all of these to public health outcomes.¹⁶

This is consistent with EPA’s monitoring of the states during the implementation plans development phase. The EPA in this final rulemaking “designed an integrative approach that helps to ensure that vulnerable communities are not disproportionately impacted by this rulemaking. The proximity analysis that the agency conducted for this rulemaking is a central component of this approach. Not only is the proximity analysis a useful tool to help identify

overburdened communities that may be impacted by this rulemaking, states can use this tool as they engage with communities in the development of their plans, consider a multi-pollutant approach, help low-income communities access EE and financial assistance programs and assess the impacts of their state plans. Metrics and tools facilitating screening for Environmental Justice factors should not be construed as a separate process, but as principles that integrated into each step of engaging the state and federal government on the SIPs and FIP developments.¹⁷

Potential processes for engaging the legislative/executive branches and at both the state and local levels are listed below generically with the expectation that a strategic plan will be developed and tailored on a case-by-case basis to meet the unique situations of each state.

B. Phase 1: Preparation/Scoping

The engagement process involves determining the focus states and communities. Begin by developing a draft strategic plan that includes the following elements: objective, research, methods, results, and conclusions. Identify state focus criteria to assist in determining which states or geographical areas should be the targets for a particular advocacy group/plan. The identification criteria should include the following factors:

1. Identification/define the vulnerable population –low income, minorities, young, elderly;
2. Identify the demographics and location of the vulnerable population;
3. Determine proximity of EGU's to vulnerable population;
4. Categorize the historical extreme environmental/weather conditions drought, floods, rains, storm severity, hurricanes, tornadoes, heat waves, severe cold, land erosion;
5. Identify ecosystem constituents that are at risks which includes fauna, flora, water quality, food supply;
6. Determine employment or lack thereof: and

7. Call out the adaption measures in place or needed.

C. Identify Criteria grassroots/grasstops advocacy efforts

To be a successful advocate, knowing the regulatory implementation process, the governmental entit(ies) tasked with rule implementation; the contacts responsible for SIP and FIP development and community contacts are essential. Formulate guiding principles and tools to engage the regulators and the communities.

1. Development of the SIP .

There are 47 states that are required to submit a SIP. The states of Vermont, Hawaii and Alaska are exempt from having to submit a SIP. Vermont does not have an EGU; and the EPA needs more information before including Hawaii and Alaska in the CPP. All the other states except Alabama, Indiana, Mississippi, Missouri, New Jersey, Oklahoma, Texas, and Wisconsin (all of which are undeclared regarding SIP development) are in some phase of developing a SIP. Advocates should have a process in place that at a minimum includes the steps listed below.

- a. Identify the state agency tasked with developing the SIP. The agency will typically be the state environmental agency.
- b. Identify the key contact persons for SIP development.
- c. Form a constructive relationship with the state contacts. Become a key source of information for the regulator to consult.
- d. Build trust, but maintain independence and integrity to assure the process protects the vulnerable and the resources.
- e. Define points in process for community and constituent engagement.
- f. Determine if the SIP will comply with a standard that is rate or mass based.

- g. Ascertain if the state will be anticipating implementing a trading program. From the demographic and geographic determination, identify the impact of the trading on the vulnerable population.
- h. Identify impacted communities; establish contacts; and build trust with the impacted communities.
- i. Identify other organizations for potential partnership opportunities in the advocacy strategy.

2. FIP rule finalization

The EPA is currently reviewing comments and finalizing the FIP. The finalized rule is expected to be released in July 2016. Efforts should be made to engage the individuals tasked with drafting the final rule. It is unlikely that substantive comments/suggestions will be taken, but the Agency will likely take meetings if time is available. Following a similar strategy as suggested for engaging the states on SIP development is warranted with EPA.

3. Education of state and community constituents

- a. Develop audience one-pagers for community contacts, engaging state attorneys and SIP drafters.
- b. Consider meeting with governors and state legislators.
- c. Engage local elected officials such as mayors.
- d. Determine what is needed for the community to become energy efficiency ready.
- e. Develop positions on key points for discussion that comprehend answers to the questions listed below.
 - i. Cap and trade—Are there alternatives?

1. How are hot spots avoided?
- ii. What federal enforceable provisions should be in the SIP or FIP to assure compliance by all regulated entities?
- iii. What measures are in place to assure the SIP or FIP is achieving the desired emission reduction goals?
- iv. What resources are needed to encourage economic development, training and job development?
- v. How can the faith based community take advantage of the CEIP?
- vi. What is the position the faith position takes on CEIP regarding earning credits for a power plant located in a community of vulnerable people?
- vii. What should the level of engagement be at the federal level besides with EPA?

1. How does the faith community engage Congress to influence positions on the Congressional Review Act (CRA)?
2. Should resources be spent on the CRA, since it is rarely successful or should this be a monitoring situation with a contingent plan?
3. Who should be monitoring the litigation? Does the faith community want to file an amicus brief if timing permits?

4. Get to know the community

- a. Determine the community concerns and values.
- b. Understand community values.
- c. What is the best means of communicating with the community?
- d. What are the current sources of significant pollution?

- e. What should be the timing of engaging the community?

5. Define success/impactful engagement

Understanding the drivers, the community, environmental conditions, and the location of the EGUs will be critical in building credibility with constituents of the government and the community. Establishing credibility is likely the best measure of successful engagement.

Second to credibility is engaging the process in a manner such that SIPs or FIP are drafted in such a manner that communities are protected which means credibility was established to constructively influence the process.

6. Suggested engagement strategies include:

- a. Develop a lead team for each state.
- b. Implement various means of communication.
 - i. Calls, meetings, webinars, television ads, mailers, one pagers, hot-line.
 - ii. Make use of email, text messages and social media.
 - iii. Make sure the faith based state contacts are accessible to community and government regulators.

IX. Resources and Tools

A. CDC

One goal of the climate change program at the Centers for Disease Control and Prevention (CDC) is helping to develop a national public health workforce that can research and address the effects of climate change on human health. This includes workforce development within CDC as well as external development through training, research funding, fellowships, internships, and partnerships with

diverse stakeholders. Contact information is 800-CDC-INFO (800-232-4636), TTY: 888-232-6348 Email CDC-INFO.

B. “Environmental Justice State Guidance: How to Incorporate Equity and Justice Into Your State Clean Power Planning Approach” created by the Environmental Justice Leadership Forum on Climate Change.

C. Attachments I – VIII for guidance and templates for the following communication avenues for advocacy purposes:

- Organization Welcome Letter;
- Writing Letters to Editors and Congress or State Representatives-- Letter to Legislative Representatives
- Letter to Legislature, Suggested Outline
- Letters to the Editor and Op-ed Articles
- Op-ed Articles
- Social Media Advocacy
- Tips for Preparing Your Testimony
- Generic Sample Talk Points and Testimony Document
for the Clean Power Plan

X. Glossary of Key Terms

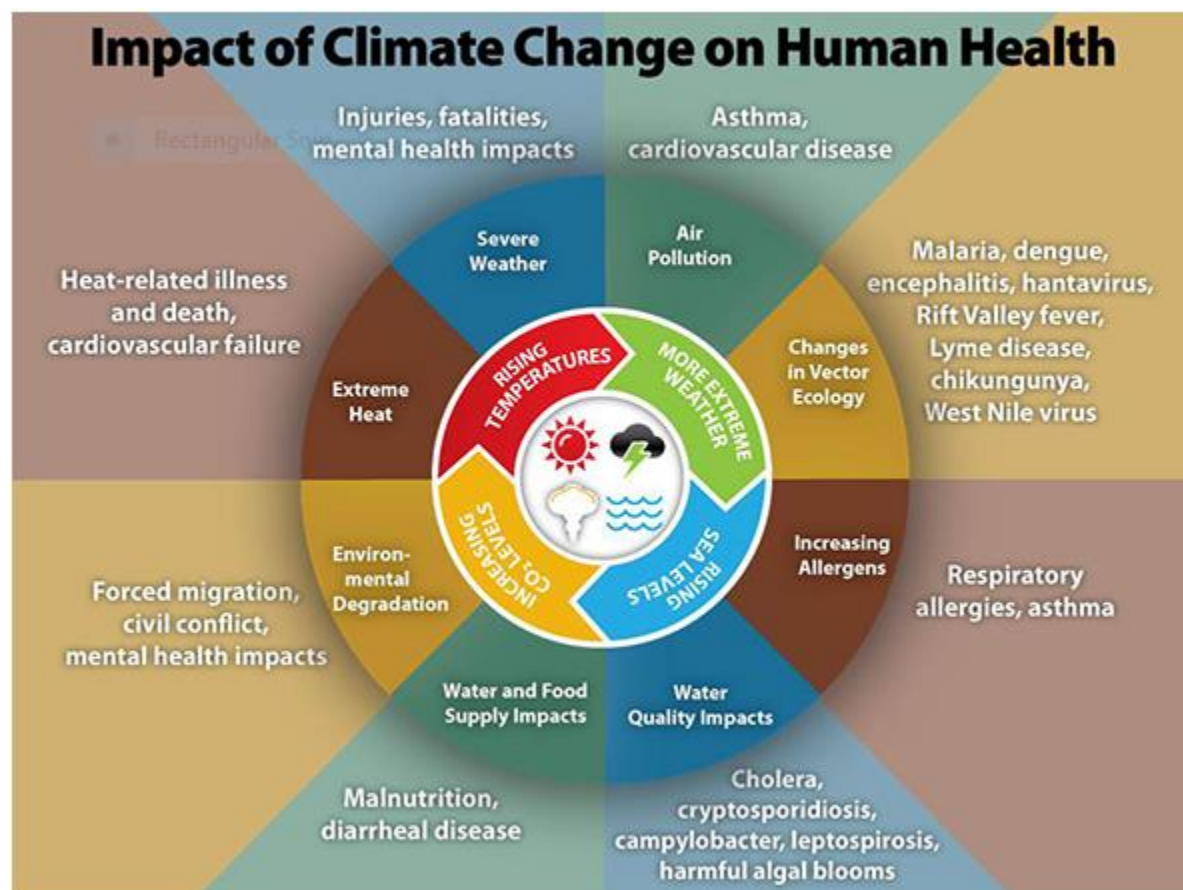
1. “Affected” electric generating units (EGUs) is a fossil-fuel-fired unit that was in operation or had commenced construction as of January 8, 2014, has a generating capacity above a certain minimum threshold, and sells a certain amount of its electricity generation to the grid.

2. Best system of emission reduction (BSER). A standard of performance that is not defined in the CAA, but EPA interprets as taking into account the cost of achieving such reduction and any non-air quality health and environmental impacts and energy requirements, the Administrator determines has been adequately demonstrated (*i.e.*, the BSER). Under CAA section 111(a)(1) and (d), the EPA is authorized to determine the BSER and to calculate the amount of emission reduction achievable through applying the BSER. The state is authorized to identify the emission standard or standards that reflect that amount of emission reduction.
3. EE is a highly cost-effective means for reducing CO₂ from the power sector, and it is reasonable to assume that a regulatory requirement to reduce CO₂ emissions will motivate parties to pursue all highly cost-effective means for making emission reductions accordingly, regardless of what particular emission reduction measures were assumed in determining the level of that regulatory requirement
4. Emission standards plan – includes source-specific requirements ensuring all affected power plants within the state meet their required emission performance rate- or a mass-based equivalent
5. federally enforceable standards state
6. “Inside the fence” actions --compliance be determined only by the actions of individual power plants.
7. “Outside the fence” actions will actions by other actors, including energy consumers

8. Qualified biomass as a “feedstock that is demonstrated as a method to control increases of CO₂ levels in the atmosphere
9. “RGGI” (Regional Greenhouse Gas Initiative)
10. State measures plan – includes a mixture of measures implemented by the state, such as renewable energy standards and programs to improve residential energy efficiency that are not included as federally enforceable components of the plan. The plan would include a backstop of federally enforceable standards on affected power plants that fully meet the emission guidelines and that would be triggered if the state measures fail to result in the affected plants achieving the required emissions reductions on schedule. States may use the proposed model rule also issued on August 3 for their backstop.

APPENDIX

Figure 1: Impact of Climate Change on Health (Source [National Center for Environmental Health](http://www.cdc.gov/climateandhealth/effects/); <http://www.cdc.gov/climateandhealth/effects/>)



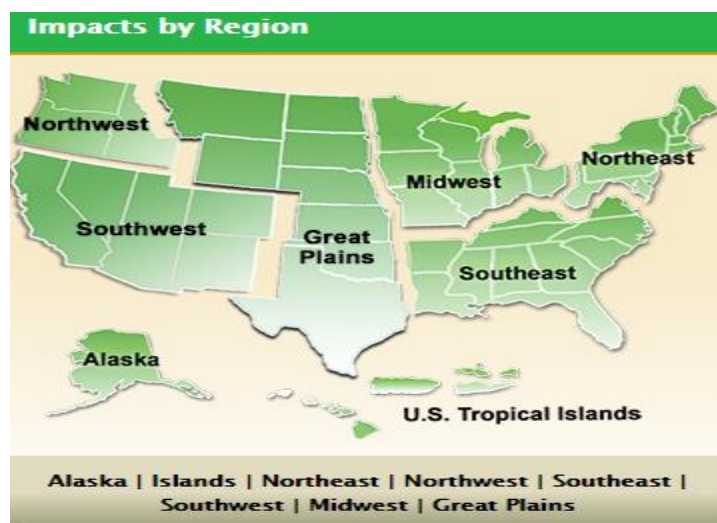
Page last reviewed: December 22, 2014

Page last updated: October 2, 2015

Content source: [National Center for Environmental Health](http://www.cdc.gov/climateandhealth/)

Figure 2--- Impact of Climate Change on Geographical Regions of the United States

(Source USEPA. See <http://www3.epa.gov/climatechange/impacts/>.)



Key points per region according to the USEPA

Alaska

- Warming in Alaska is already thawing permafrost, decreasing Arctic sea ice, changing ecosystems, and threatening the traditional livelihoods of native Alaskans.
- Extensive permafrost thaw is expected by the end of this century, increasing the risk of infrastructure damage.
- Arctic sea ice is projected to continue to decline, with nearly ice-free periods possible by mid-century.
- Changes are expected in the extent, location, and productivity of critical marine and terrestrial habitat for fish and wildlife.
- Native Alaskans are expected to experience declining availability of traditional foods and reduced access to sea ice hunting grounds.

Great Plains

- Warmer winters are altering crop growth cycles and will require new agriculture and management practices as climate change impacts increase.
- Projected increases in temperature and drought frequency will further stress the High Plains Aquifer, the primary water supply of the Great Plains.
- Changes in water availability are likely to present challenges to agricultural irrigation and threaten key wetland habitats.
- Older residents in rural areas and people living on Native American reservations are especially vulnerable to the impacts of climate change.

Islands

- Warmer and more acidic oceans are adding to existing stresses on coral reefs and fish communities.
- Sea level rise is expected to threaten the water supplies, ecosystems, and infrastructure of U.S. tropical islands.
- Climate change is likely to affect livelihoods, as well as tourism and other important economic sectors on tropical islands.

Midwest

- Temperature increase in the Midwest has accelerated in recent decades, particularly nighttime and winter temperatures.
- This region will likely experience warmer and wetter winters, springs with heavy precipitation, and hotter summers with longer dry periods.
- Risks to human health are expected to rise with warmer temperatures, reduced air quality, and increased allergens.
- There may be higher yields of important agricultural crops for a limited period of time. However, over time, increasingly warmer temperatures and other stressors are expected to decrease yields.

Northeast

- The Northeast is experiencing warming temperatures and a large increase in the amount of rainfall measured during heavy precipitation events.
- More frequent heat waves in the Northeast are expected to increasingly threaten human health through more heat stress and air pollution.
- Sea level rise and more frequent heavy rains are expected to increase flooding and storm surge, threatening infrastructure.
- As temperatures rise, agriculture will likely face reduced yields, potentially damaging livelihoods and the regional economy.

Figure 2 --- Impact of Climate Change on Geographical Regions of the United States (continued)

(Source USEPA. See <http://www3.epa.gov/climatechange/impacts/>.)

Northwest

- Warming temperatures and declines in snowpack and streamflow have been observed in the Northwest in recent decades.
- Climate change will likely result in continued reductions in snowpack and lower summer streamflows, worsening the existing competition for water.
- Higher temperatures, changing streamflows, and an increase in pests, disease, and wildfire will threaten forests, agriculture, and salmon populations.
- Sea level rise is projected to increase erosion of coastlines, escalating infrastructure and ecosystem risks.

Southeast

- Coastal communities in the Southeast are already experiencing warmer temperatures and the impacts of sea level rise, including seawater flooding.
- Higher temperatures and greater demand for water will strain water resources in the Southeast.
- Incidences of extreme weather, increased temperatures, and flooding will likely impact human health, infrastructure, and agriculture.
- Sea level rise is expected to contribute to increased hurricane activity and storm surge, and will increase the salinity of estuaries, coastal wetlands, tidal rivers, and swamps.

Southwest

- Warming temperatures and reduced snowpack have been observed in recent decades in the Southwest.
- Increasing temperatures and more frequent and severe droughts are expected to heighten competition for water resources for use in cities, agriculture, and energy production.
- Native communities are expected to experience more difficulties associated with access to freshwater, agricultural practices, and declines in medicinal and cultural plants and animals.
- Drought, wildfire, invasive species, pests, and changes in species' geographic ranges will increase threats to native forests and ecosystems.

Attachment I: Organization Welcome Letter

Welcome Letter from the [Organization Name]

Dear _____,

Thank you for your commitment and support of the Clean Power Plan and working with the _____. We believe implementation of the Clean Power Plan is critical for reducing the impact of the threat of climate change. Your direct contacts with your local, state and Congressional representatives and senators are integral parts of assuring that every state creates a strong and effective state implementation plan that successfully meets carbon reduction targets --- without shifting costs to impoverished communities.

In particular, we encourage renewable energy projects to meet state carbon reduction goals and to generate new jobs for working families. The Clean Power Plan allows each state to develop its own state implementation plan to meet a customized carbon reduction target. It elegantly recognizes the diversity of energy landscapes in the United States, giving each state an opportunity to account for the local economy as well as local eco-systems. [Creation Justice Ministries] wants to make your advocacy efforts as easy and productive as possible and hopes you find this toolkit helpful.

Successfully deploing of advocacy strategies helps to reinforce the faith communities' efforts on the front lines of providing relief and aid to those who are bearing the unequal burden of climate change. Now, with the Clean Power Plan, we have a chance to prevent suffering by limiting a major contributor to climate change: carbon pollution.

In this toolkit, you will find _____ materials to help you promote and support the implementation of the Clean Power Plan. Our policy consultant, is available for support as we implement this advocacy strategy. Should you have any questions, please contact [XXXX] at [XXXXXXXXXX] via email, _____. For further support, please refer to the state advocacy campaign contacts on page _____ of the toolkit.

I hope you will use and keep this toolkit in your repertoire to continue your great work. Thank you for all you do to be stewards of God's creation.

Warm Regards,

Attachment – II: Writing Letters to Editors and Congress or State Representatives

Letters to Legislative Representatives

General

The faith based community must make our voices heard to our state regulators, legislative representatives and governors. We also need to keep communication lines open with our Congressional representatives and senators. We need to know the positions that our members of Congress are taking on this Clean Power Plan. As constituents we must make them aware of our concerns and why implementation of the Clean Power Plan is vital to the health and well being to our citizens, their constituents and those for whom we are caretakers. They need to know that the clean energy transition is vital to the health of the next generation. Pollution is harming our children, and children of color are experiencing the worst impacts.

Forming relationships with your Congressional representative or senator and your state legislative members and governor are critical in creating good will with them. Face-to-face meetings are important, but so are letter writing campaigns. The general wisdom seems to fall to originality and sincerity, that is, congressional staffers indicate it is better to send individual handwritten letters versus form letters.

State policy-makers are facing the challenge of transitioning to cleaner energy according to guidelines in the Clean Power Plan. Please urge your governor and state legislators to swiftly plan to get your state on track toward a future with cleaner energy and cleaner air in the implementation of the Clean Power Plan by creating a strong and effective state implementation plan that successfully meets carbon reduction targets --- without shifting costs to impoverished communities.

Attachment III: Letter to Legislature, Suggested Outline

A suggested letter outline is shown below:

- Introduce yourself and acknowledge the senator/representative for their work.
- Share your concern about climate change.
 - Example: We are aware of the threats posed by a changing climate. Already, we have seen rising floodwaters, severe droughts, disrupted access to food, harsh storms, higher rates of asthma, and increased vector borne diseases. Climate change is most harming the vulnerable among us: people living in poverty, older adults, and people living in countries least responsible for contributing to climate change.
- Urge the state to create an effective state implementation plan.
 - Create a strong and effective state implementation plan that successfully meets carbon reduction targets
 - Avoid plans that shift costs to impoverished communities.
 - Encourage renewable energy projects to meet state carbon reduction goals and to generate new jobs for working families.
- Thank them for their consideration and offer to discuss these points in more detail.
- Include your contact information.
- Address your letter as follows for members of Congress:
 - **Congressional Representative**
Rep. [NAME HERE]
U.S. House of Representatives
Washington, DC 20515
 - **Senator**
Sen. [NAME HERE]
U.S. Senate
Washington, DC 20510
 - For governors and your state legislative members, see Creation Justice Ministries web page at http://action.creationjustice.org/p/dia/action3/common/public/index.sjs?action_KEY=15649 and follow the directions for addressing your message to the appropriate recipient, we need to identify where you are.
 - Governor

 - State Representative

 - State Senator

Attachment IV: Letters to the Editor and Op-ed Articles

One of the best ways to influence elected officials and move the national conversation forward on solutions to climate change is to get letters to the editor and Op-ed articles published in local and national newspapers.

Letters to the Editors

Tips on Writing a Letter to the Editor ¹⁸

Letters to the editor are powerful advocacy tools. Letters to the editors are among the most widely read sections of newspapers and magazines; are closely monitored by legislators to find out what voters are thinking and hearing; can strengthen the impression of widespread support of or opposition to an issue; can influence editorial writers to take a stand; and can influence other members of the media to probe an issue more deeply.

Some tips to increase the chances of getting letters to the editor published include:

- Determine the submission requirements (length, font size, and format) in the publication. Most publications prefer letters to be 250 words or less. Be succinct.
- Timeliness is key. Many major newspapers publish letters responding to articles, editorials or other letters the day after they appear. The easiest way to respond quickly is via email. Many publications also allow you to submit letters directly through their websites.
- A letter is more likely to be published when written in response to something that has appeared in the publication. When you respond, include a reference to the article, letter or editorial.
- You may also time your letter for an event you know is coming.
- Make sure your lead sentence is compelling to draw the reader's attention.
- Limit the letter to one topic.
- Include a local slant by including the impact of the issue on the local community.
- Make the letter lively but reasonable. Verify facts, and make sure quotes are accurate. Depending on the issue, consider using humor or a personal story. Refrain from personal attacks.
- If using a sample letter from an organization, take time to rephrase in your own writing style.
- Include your name, organization (if applicable), address and telephone number(s). Newspapers will often only publish a letter if they are able to contact the signer to make sure s/he is the author.

Attachment V: Op-Ed Articles

Writing and publishing clearly and persuasively in an op-ed article, allows you to reach millions of people, sway hearts, change minds and perhaps even reshape public policy. In the process, you may also earn recognition for yourself and your institution.¹⁹

Guidelines for publishing an op-ed include the following:

- **Track the news and be ready to immediately publish an op-ed in direct response or as a reaction to a matter that is dominating the news.** Link your issue explicitly to something happening in the news.
- **Limit the op-ed to 750 words.**
- **Make single point succinctly and compelling.**
- **Put your main point on top. In reality you have no more than 10 seconds to hook a busy reader.**
- **Tell readers why they should care.**
 - Put yourself in the place of the busy person looking at your article.
 - At the end of every few paragraphs, ask out loud: “So what? Who cares?” Explain why.
 - Appeals to self-interest usually are more effective than abstract punditry
- **Offer specific recommendations.** An op-ed is not a news story that simply describes a situation; it is your opinion about how to improve matters.
- **Showing is better than discussing.** Look for great examples that will bring the argument to life.
- **Embrace your personal voice.** The best of these examples will come from your own experience.
- **Play up your personal connection to the readers.**
 - Daily newspapers in many cities are struggling to survive competing with national publications, television, the internet, and blogs..
 - If you’re submitting it in a city where you once lived or worked, be sure to mention this in your cover note and byline.
 - if you’re writing for a publication that serves a particular profession, ethnic group or other cohort, let them know how you connect personally to their audience
- Use short sentences and paragraphs.
- Avoid jargon.
- Use the active voice.
- Avoid tedious rebuttals.

- Acknowledge the other side, that is, give credit to the opponent for points that are correct.
- **Make your ending a winner.**
 - It is important to summarize the argument in a strong final paragraph. (Many casual readers scan the headline, skim the opening and then read the final paragraph and byline.)
 - Many columnists conclude with a phrase or thought that appeared in the opening, thereby closing the circle
- Relax and have fun.
- **Don't worry about the headline.** (The newspaper will write its own headline.)
- **Include graphics if possible to aid reader in visualization.**
- Submit the article. Review the newspaper's submission guidelines.
- Where to submit the article is a challenge. Submissions to local paper carry the higher percentage of acceptance. The national papers receive a very large volume of submissions, where most are rejected.

Attachment VI: Social Media Advocacy

Social Media Best Practices^{20,21}

General

- Make sure to comprehend Creation Justice Ministries' objectives/mission.
- Stick to Creation Justice Ministries' actions and themes.
- Captivate audience.

Twitter

- Use a hashtag #CleanPowerPlan in each Tweeter message about the Clean Power Plan.
- Other hashtags that may be used include_____.
- Engage or retweet followers that show interest in the advocacy effort.
- Tweets with picture tend get re-tweeted more often. Make sure the tweet provides context for the message.
- The message may be re-purposed on Instagram or Snapchat

Facebook

- Facebook engagement rates are 18% higher on Thursday and Fridays, with the afternoon being the best time to post.
- Determine which organizations to tag in your posts.
- Use images or photos where possible to increase visibility and likelihood of engagement.

Attachment VII : Tips for Preparing Your Testimony

- Introduce yourself.
- Time Limit is typically five minutes: all testimony will be limited to this timeframe.
 - Remember this formula: 1 minute =150 words. Your 5 minute comments shouldn't exceed 750 words.
 - Write your comments down and practice them in front of the mirror or in front of friends and family, so you are familiar with what you want to say.
- Make it personal.
 - Use your comments to put a human face on the matter you are addressing.
 - Articulate why you are moved by your religious tradition to speak out on this issue.
 - Express your personal concerns about the impact of the matter being discussed. Consider including information related to the following:
 - Have you been personally affected by the effects of the matter?
 - Is a place you love or is very important to you or the community being impacted?
 - For example the Clean Power Plan—do you live near coal-fired power plant that has high emission rates?
 - Do you, someone in your family or someone close to you suffer from an illness related to the effects of the matter you are addressing?
 - Are you a public health provider, counselor or other professional serving people whose illness is caused by pollution?
 - Make a greater impact by using visuals (photos, charts, equipment or graphs) to tell your story. Some examples of visuals include:
 - Geographical areas impacted by the matter you are discussing.
 - Family portraits
 - Family members including children and babies
 - Medical equipment such as asthma inhalers
 - Mail or correspondence supporting your topic.
- Include a few key facts:
 - See sample talking points in Attachment ___ on the Clean Power Plan.
 - Do not be overly technical
 - Be sure statements are accurate
 - Make sure statements are easily understood by the audience.

Attachment VIII: Generic Sample Talk Points and Testimony Document for the Clean Power Plan

Good morning, ladies and gentlemen. I want to begin by thanking the [XXXX] for holding these [_____] sessions. Also, I applaud the EPA for drafting and finalizing the Clean Power Plan.

My name is [XXXX]. I am the [POSITION] of [NAME OF ORGANIZATION]. We bring together [HIGH LEVEL INFORMATION ABOUT YOUR ORGANIZATION]. Together we have a reach of an estimated [XXXXXX] congregations nationwide and [XXXX] congregations globally

- As people of faith we are called to care for God's people and Creation, especially the most vulnerable—children; the elderly; low-income people who cannot move away from the pollution; and those suffering from illnesses caused by carbon dioxide emissions such as respiratory issues. We have a moral obligation to address the profound impacts of the way we produce and use energy. The carbon dioxide emissions from power plants account for 40% of the carbon pollution in the United States. Besides causing the earth's climate temperature to increase, the impact of global warming—climate change is far reaching. From a macro level the weather is becoming more intense—severe flooding, intense and prolonged draughts, land erosions that will communities to disappear and locally significant health impacts. [IF POSSIBLE IDENTIFY SOME PERSONAL FACTS OR COMMUNITY IMPACTS OR USE WORDING SIMILAR TO → More frequent heavy rains is expected to increase flooding and storm surge, threatening infrastructure. As temperatures rise, agriculture will likely face reduced yields, potentially damaging livelihoods and the regional economies.

Creation Justice Ministries' membership is located in and serves communities where power plants are located. Communities all over America are already being harmed by carbon dioxide pollution from power plants We have an obligation to implement measures and care for communities that are most impacted by the results of the carbon dioxide emissions from power plants. We have a moral duty to act.

- We have a sacred responsibility to leave our children and future generations with a sustainable environment and a safe climate.
- We have an obligation to protect our children and future generations from the impacts of climate change by addressing the main cause carbon dioxide emissions. We need to address the main cause of carbon dioxide pollution—power plants.

Implementations of the Clean Power Plan provides a huge step in addressing carbon dioxide emissions and making positive impacts on health and simultaneously grow the economy.

- Preventing up to 150,000 asthma attacks and 6,600 premature deaths annually by 2030;
- Reduce health costs and emergency room visits;
- Drive innovation in clean energy sources to power the 21st century, growing the economy and creating job.

The Clean Power Plan allows states the flexibility they need to develop customized plans that will keep our energy affordable and reliable, while helping to provide a sustainable, safe and secure environment for the future generations.

Reducing carbon dioxide emissions from power plants is a great initial step, but this is a marathon and not a sprint in achieving an environment that sustains the future.

Today I join my fellow faith based entities and ask that nothing is done to derail these important regulations. Allow the states to develop strong implementation plans that do not shift the burden of compliance on the vulnerable communities.

Thank you for the opportunity to testify.

Table I: States' Status on Implementation of the Clean Power Plan Post U.S. Supreme Court Stay of the Rule (Source E&E News Power Plan Hub as of 2/22/16)

| State | Planned Action on CPP* | Role in Litigation versus EPA | Comment |
|----------------------|------------------------|-------------------------------|---|
| Alabama | Suspending | Suing | |
| Arizona | Evaluating | Suing | |
| Alaska | Exempt | | Exempt from rule. |
| Arkansas | Continuing | Suing | ADEQ* and APSC* on Feb. 12 message to stakeholders, sought feedback on how to proceed and talked of further engagement on a timeline and in a context that makes sense. |
| California | Continuing | Supporting | |
| Colorado | Continuing | Suing | |
| Connecticut | Continuing | Supporting | |
| Delaware | Continuing | Supporting | |
| District of Columbia | Exempt | | Supports EPA |
| Florida | Evaluating | Suing | |
| Georgia | Suspending | Suing | |
| Hawaii | Exempt | | Supports EPA |
| Idaho | Continuing | Not suing | Plan to slow down |
| Illinois | Continuing | Supporting | IEPA* said it will continue to meet with stake-holders to determine the best course of action |
| Indiana | Suspending | Suing | |
| Iowa | Evaluating | Suing | |
| Kansas | Suspending | Suing | |
| Kentucky | Suspending | Suing | |
| Louisiana | Continuing | Suing | |
| Maine | Continuing | Supporting | MDEP* stated, "As a result of the stay, we have adjusted our schedule slightly pending further judicial action." |
| Maryland | Continuing | Supporting | |
| Massachusetts | Continuing | Supporting | |
| Michigan | Suspending | Suing | |
| Minnesota | Continuing | Supporting | |
| Mississippi | Suspending | Suing | |
| Missouri | Evaluating | Suing | |
| Montana | Suspending | Suing | |
| Nebraska | Suspending | Suing | |
| Nevada | Evaluating | Not Suing | |
| New Hampshire | Continuing | Supporting | |
| New York | Continuing | Supporting | |
| New Jersey | Suspending | Suing | |

| | | | |
|----------------|------------|------------|---|
| New Mexico | Evaluating | Supporting | |
| North Carolina | Suspending | Suing | |
| North Dakota | Suspending | Suing | |
| Ohio | Evaluating | Suing | |
| Oklahoma | Suspending | Suing | |
| Oregon | Continuing | Supporting | |
| Pennsylvania | Continuing | Not suing | |
| Rhode Island | Continuing | Supporting | |
| South Carolina | Evaluating | Suing | South Carolina says it's too early to tell what impact the high court's decision will have. The state's Health and Environmental Control Department will review the next steps with electric companies and other stakeholders that have been working together since the draft rule was released, an agency spokesman said |
| South Dakota | Suspending | Suing | |
| Tennessee | Evaluating | Not suing | |
| Texas | Suspending | Suing | |
| Utah | Suspending | Suing | |
| Vermont | Exempt | | Supports rule |
| Virginia | Continuing | Supporting | |
| Washington | Continuing | Supporting | |
| West Virginia | Suspending | Suing | |
| Wisconsin | Suspending | Suing | |
| Wyoming | Continuing | Suing | Wyoming Gov. Matt Mead (R) told <i>E&E</i> although he considers the stay "a great bit of good news," his state will continue to plan for the rule, although "maybe not at the same pace, |

Acronyms

| | |
|------|--|
| ADEQ | Arkansas Department of Environmental Quality |
| APSC | Arkansas Public Service Commission |
| CPP | Clean Power Plan |
| IEPA | Illinois Environmental Protection Agency |
| MDEP | Maine Department of Environmental Protection |

Legend

| |
|------------|
| Continuing |
| Evaluating |
| Exempt |
| Suspending |

References

1. “Climate Effects on Health”, accessed February 4, 2016, <http://www.cdc.gov/climateandhealth/effects/> .
2. “Causes of Climate Change”, accessed February 6, 2016, <http://www3.epa.gov/climatechange/science/causes.html#greenhouseeffect>
3. James E. McCarthy, Jonathan L. Ramseur, Jane M. Leggett, Alexandria M. Wyatt, Alissa M. Dolan, CRS Report R44341, EPA’s Clean Power Plan for Existing Power Plants: Frequently Asked Questions,(January 13, 2016), p. 2.
4. Settlement Agreement Between State of New York, et al., and U.S. EPA, December 23, 2010, at <http://www2.epa.gov/sites/production/files/2013-09/documents/boilerghgsettlement.pdf>; CRS Report R41103, Federal Agency Actions Following the Supreme Court’s Climate Change Decision in *Massachusetts v. EPA*: A Chronology, by Robert Meltz, p. 7.
5. “Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units,” Final Rule, 80 Federal No. 205, October 23, 2015, p.64662.
6. Ibid., 64664.
7. “FACT SHEET: Overview of the Clean Power Plan”, accessed February 6, 2016,<http://www.epa.gov/cleanpowerplan/fact-sheet-overview-clean-power-plan>.
8. James E. McCarthy, et. al., Op.Cit. p.10.
9. “Fact Sheet: Clean Power Plan and the Role of States”, accessed February 6, 2015, <http://www.epa.gov/cleanpowerplan/fact-sheet-clean-power-plan-and-role-states>.
10. “Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units”, Op. Cit. p.64668.
11. James E. McCarthy, et. al., Op.Cit. p.9.
12. Ibid., pp.23-24.
13. “Climate Effects on Health”, accessed January 30, 2016, <http://www.cdc.gov/climateandhealth/effects/default.htm>.
14. “Impact of Climate Change on Geographical Regions of the United States”, accessed January 30, 2016,<http://www3.epa.gov/climatechange/impacts/>.
15. “Building Climate Equity”accessed January 30, 2016, <http://www.wri.org/publication/building-climate-equity>.
16. Mary Kreger, DrPH, Katherine Sargent, BA, Abigail Arons, MPH, Marion Standish, JD, and Claire D. Brindis, “Creating an Environmental Justice Framework for Policy Change in Childhood Asthma: A Grassroots to Treetops Approach”, *Am Public Health*. 2011 December; 101(Suppl 1): S208–S216.
17. “EJ Screening Report for Clean Power Plan”, accessed January 30, 2016, <http://www3.epa.gov/airquality/cppcommunity/ejscreencpp.pdf> .
18. See from the NETWORK, A National Catholic Social Justice Lobby, <http://network-education.org/nep/resource/letter-editor-tips>

19. Duke Office of News & Communication, “How to Write an Op-Ed Article”, http://newsoffice.duke.edu/duke_resources/oped.
20. Know the Facts First: Teen STD Awareness & Education Campaign. [Know the FactsFirst.gov](http://www.knowthefactsfirst.gov).
21. Cruz, The Social Media Best Practices Handbook: 13 Experts Give Their Perspective on the Industry, July 8, 2015 <http://blog.sumall.com/journal/the-social-media-best-practices-handbook-13-experts-give-their-perspective-on-the-industry.html#ixzz3yzRfsssq>