



# Environment America Federation Comments on RGGI Program Review

*February 17, 2017*

On behalf of the Environment America Federation organizations in the Northeastern and Mid-Atlantic states, and the hundreds of thousands of members, supporters and activists we represent across the region, thank you for our ongoing engagement with stakeholders around the future of the Regional Greenhouse Gas Initiative, and thank you for the opportunity to provide further comment.

**Going forward, we would like to see a clear, ambitious trajectory for the cap on carbon pollution, declining by 5 percent per year from 2020 to 2030.** We believe that a clear, ambitious program is critical for states to meet their broad 2030 and 2050 climate goals. Updating the program through 2030 will also help to provide market certainty for power plant owners and other stakeholders about where the region is headed in terms of emissions.

We encourage the RGGI states to continue to move the program review process along without delay, with a goal of presenting policy cases by mid-April and finalizing a suite of program elements for state adoption no later than this summer.

In response to the discussion of reference case modeling assumptions during the most recent webinar, we agree with the comments submitted separately by Acadia Center, NRDC, Sierra club and others, (*“Joint Stakeholder Comments on Updated RGGI Reference Case Modeling Assumptions,” February 17, 2017*). We appreciate your effort to update the reference case assumptions and echo the specific recommendations listed in those joint comments.

Acting quickly to cut global warming pollution is urgent and important.

In January, [NASA announced](#) that 2016 was the hottest year on record for our planet, breaking records last set in 2015 and 2014. We know global warming is happening and we know that we are the cause.

Here in the Northeast and Mid-Atlantic, we’re feeling the impacts. New England is warming faster than anywhere in the United States except for Alaska.

There's never been a more urgent time to talk about cutting pollution. So we are glad to see our states updating the best regional clean air and climate program in America – the Regional Greenhouse Gas Initiative.

This program is a huge success. Across the region, our states have cut power plant pollution [in half since 2005](#). And by participating in the program, we have generated more than [\\$2.5 billion](#) for [clean energy investment](#).

At the same time, the program has helped to clean our air and improve our health. [A new analysis](#) last month showed that over its first 6 years, the program saved 600 lives, averted 9,000 asthma attacks, and prevented 260,000 days where people would have had to restrict daily activities, such as exercise, due to air pollution.

And the program is helping to accelerate our transition away from dirty fuels and toward clean energy – especially because we make power plant owners pay for every ton of pollution they emit. That is driving a lot of great clean energy projects in our communities. However, we can and must do more.

Over the next three months, we have a chance to double the strength of the Regional Greenhouse Gas Initiative. Doing so would cut pollution faster, help us live longer and healthier lives, speed our transition to clean energy and strengthen our economy.

With leadership unlikely to come from Washington DC, states must show the way forward.

We urge the nine northeast governors to lead the charge on climate. We should double the strength of the Regional Greenhouse Gas Initiative to cut pollution in half again by 2030 and invest more in energy efficiency, wind and solar power.

Together we can build a renewable energy future, and deliver clean air and a safe, healthy climate for us all.

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