Public Comment on the US.EPA proposed “Clean Power Plan”
in regards to: Power Plant Carbon Emission Regulations

**Three Main Environmental Problems resulting from Clean Power Plan**

(Being that you've only about 400,000 public comments expected, let me make this comment brief & direct.)

Overall, the “Clean Power Plan” is very good for its limited scope, but must go further to achieve long-term benefits.

Short-term, the Clean Power Plan substantially reduces atmospheric carbon GHGases & other criteria air pollutants (particulates, NOx, SOx, HC, etc.), by means of replacing coal burning with nat. gas. at power plants.

PROBLEMS: However, at least 3 long-term problems will be exacerbated by the CPP and could potentially override the intended benefits.

1. GHG emissions could potentially increase from CPP. Fugitive methane emissions are not measured accurately enough in regards to it whole life-cycle atmospheric emissions, (which are from gas/oil extraction, its distribution, its processing and finally its combustion).
   In addition, surface and underground pollution from oil/gas extraction is often found to be excessive, as it becomes further researched.

2. The insufficiently regulated oil/gas industry will expand to produce even cheaper nat. gas prices. A major result is inevitably to stifle the essential growth in energy efficiency (DSM...) and renewable energy implementation.

3. The expansion of gas/oil extraction will not necessarily lead to a reduction in coal extraction, nor in global GHG & other pollution. The coal mining (& oil extraction) operations can simply export their excess capacity to the world’s industrial markets, instead of our U.S. power plants.
SOLUTIONS: The CPP must enable EPA to plan for developing better regulations to remedy the three growing problems, (previously mentioned). Solutions should include:

1. EPA must support research to accurately measure the total system’s fugitive methane emissions, (being from extraction, processing, distribution & utilization). Furthermore, EPA must support researching, measuring and better estimating the total “external costs” of all pollution from the increased nat. gas, & other fossil fuel production/consumption.

2. Then, to compensate for large fugitive methane emissions and other resulting pollution costs, there must be a commitment to gradually yet substantially increase fossil fuel taxes accordingly. Then refund all tax revenue back by supporting more rapid expansion of our energy efficiency and renewable energy applications.

3. Limit the total GHG and other pollution resulting from fossil fuel production & consumption in U.S. This may require limiting the rate of fossil fuel extraction.

Overall, the CPP does very well to close front door to keep out the threat of atmospheric carbon & other pollutant from power plants. However, our metaphorical back door is left wide open to allow other threats to enter,

where Fugitive methane emissions grow,
Oil & other fossil fuel extraction expands uncontrollably, and our essential Energy Efficiency/Renewable energy industry is stifled.

As a contingency to passing the CPPlan, EPA must commit to a broader plan to resolve these 3 major problems, which will otherwise result from the currently proposed CPP.