



MASSACHUSETTS INTERFAITH POWER & LIGHT

POB 590564 • Newton Centre, MA 02459 • 617-244-0755 • www.MIPandL.org

EXECUTIVE COMMITTEE

James D. Nail
President
Vincent Maraventano
Executive Director
Susan Almono
Rev. Jeffrey Barz-Snell
Frances Ludwig
James O'Reilly
William Schroeder
Jeffrey Steinfeld

ADVISORY BOARD

Rev. Dr. James Antal
UCC, Mass. Conference
Richard Baxter,
Premium Power Corporation
Rt. Rev. Roy F. Cederholm
Episcopal Diocese of Mass.
Rachel Cleetus
Union of Concerned Scientists
Robert Garrity
Mass. Climate Action Network
Ross Gelbspan, *author*
Roger S. Gottlieb
Worcester Polytechnic Institute
Rev. Michael Harvey
Conf. of Baptist Ministers
Amory Lovins
Rocky Mountain Institute
Robert Massie
New Economics Institute
William Moomaw
Tufts University
David Murphy, P.E.
Tighe and Bond
Thomas Nutt-Powell
Capital Needs Unlimited
Rev. Dr. Anthony G. Pappas
American Baptist Churches of MA
Geeta Pradhan
The Boston Foundation
Hon. Byron Rushing
Mass. House of Representatives
Sergio Siani, P.E.
Norian/Siani Engineering
Hon. Frank Smizik,
Mass. House of Representatives
Alan Teperow
Synagogue Council of Mass.
Richard Trethewey
This Old House/RST, Inc.

November 4, 2013

H. Curtis Spalding, Regional Administrator
US Environmental Protection Agency, Region I
5 Post Office Square - Suite 100
Boston, MA 02109-3912

Dear Administrator Spalding,

As a person of faith I believe that **it is our moral responsibility to care for all of creation.** Strong federal safeguards to reduce carbon pollution from existing power plants are an essential step toward meeting that responsibility.

The suffering caused by climate change is disproportionately borne by the poor and those least able to adapt. As reported in the NY Times on November 3d of this year, the International Panel on Climate Change (IPCC) has found that climate change may result in a 2% reduction in the world's food supply, while demand is expected to rise 14% in each coming decade. Any shortfall would lead to rising food prices that would hit the world's poor the hardest, as has already occurred from the climate change caused price increases of recent years.

The connection between climate change and hunger is just one graphic example of how **climate change is a justice issue.** The increased intensity of floods, storms and wildfires in recent years provide other visible examples that this is a problem of Biblical proportions.

Mass. Interfaith Power and Light (MA IP&L) is a non-profit organization whose mission is to provide a religious response to climate change. On behalf of our 211 Massachusetts faith community members, we urge the EPA to carry out its statutory responsibilities under the Clean Air Act in the following way:

- Proceed with the plan to regulate carbon and other greenhouse gases under section 111 (d) of the Clean Air Act;
- Recognize the work already done by the New England and northeast states to lower emissions through the

- Regional Greenhouse Gas Inventory, (RGGI); and allow RGGI as a qualifying mechanism for the state implementation plans (SIPs) that EPA will require from states under sec. 111 (d);
- Allow energy efficiency as a strategy for state emission reductions, with the details regarding evaluation, measurement and verification to be worked out in EPA regulations; and
- Model the EPA program after RGGI by making it “mass-emission based” rather than “emissions-rate based”. By that we mean that states should be presented with a target based on a generation profile that they need to achieve, and all existing generating sources within that state must combine to meet that target.

All of the world’s religions teach compassion toward the most vulnerable among us. Strong EPA action on carbon pollution is a necessary part of a compassionate response to the injustices being caused by the climate change crisis.

“If not us who? If not now when?”

Thank you for this opportunity to comment on the carbon rules for existing power plants.

Yours truly,



Vincent Maraventano, JD
Executive Director
vince@MIPandL.org