Dear Acting Administrator Wheeler:

The Environmental Protection Agency (EPA) recently invited public comment on its proposed Emission Guidelines for Greenhouse Gas Emissions From Existing Electric Utility Generating Units; Revisions to Emission Guideline Implementing Regulations; Revisions to New Source Review Program, also being called the Affordable Clean Energy (ACE) rule.

Experts at The Heartland Institute, a national nonpartisan research and education organization, have researched climate change, greenhouse gas emissions, energy economics, environmental issues, and human health impacts for more than 30 years. According to our research, there was no need or justification for the Obama administration to impose its economy-killing Clean Power Plan. The scientific evidence gets stronger every day that global warming alarmism is a failed theory. To the extent EPA has chosen to implement greenhouse gas regulations, the ACE rule is far superior to the Clean Power Plan.

Global Warming Is Not an Imminent Threat

The Clean Power Plan is unjustified because the scientific evidence strongly contradicts global warming alarmism. For example, in 1990, the United Nations Intergovernmental Panel on Climate Change (IPCC) First Assessment Report predicted 0.3 degrees Celsius...
warming each decade for the ensuing century.\(^1\) Skeptical scientists predicted just 0.1 degrees Celsius per decade and were vilified for their assessment. Now, 30 years later, temperatures have warmed at just 0.13 degrees Celsius per decade.\(^2\) This is less than half what IPCC predicted and almost exactly what skeptics predicted. The United Nations predicted more than twice as much (230 percent) warming than actually occurred. The United Nations has already conceded much of its error, now predicting merely 0.2 degrees Celsius warming per decade – which would be meeting skeptics in the middle. Even that new prediction is likely to prove wrong, as temperatures continue to rise at merely 0.13C per decade, which is the same pace that occurred during the first half of the twentieth century, even before coal power plants and SUVs. Skeptics are being vindicated with every new global temperature update.

To the extent the long-term moderate warming trend continues, it is bringing with it strong net benefits. Warmer temperatures and more atmospheric carbon dioxide are creating ideal plant and crop conditions. NASA satellite instruments have documented a remarkable greening of the earth in recent decades.\(^3\) Deserts are shrinking, giving way to grasslands and savannahs. Forests are experiencing tremendous foliage increases. The earth is a greener place thanks to [natural] global warming.

Crop production sets new records around the globe virtually every year.\(^4\) Crop yields are feeding more people while requiring less land to grow food. Global warming is reducing world hunger and allowing more farmland to return to a natural, undeveloped state. Global warming is alleviating human hunger and allowing the conservation of more natural land.

Scientists have documented in *The Lancet*, one of the world’s premier peer-reviewed medical journals, that fully seven percent of global deaths are caused by less than optimal temperatures. That is four million temperature-caused deaths every year. Of those deaths, 20 times more people are killed by cold temperatures than by heat.\(^5\) Moreover, the vast majority of those deaths were caused by persistent, moderately cold temperatures rather than extreme cold events. Global warming is reducing the frequency and duration of such persistent moderate cold events that kill nearly four million people every year. By doing so, global warming is directly saving the lives of – at a minimum – tens of thousands of people every year.

There has been no increase in hurricanes, tornadoes, droughts, floods, or other extreme weather events to mitigate the good news.\(^6\) Each of these extreme weather events preceded the earth’s recent moderate

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warming. The fact that these events still occur, as they have for millennia, does not mean global warming suddenly caused them – especially considering they are no more prevalent now than they were decades or centuries ago.

In summary, there is no global warming crisis justifying the Clean Power Plan. If EPA feels compelled to regulate carbon dioxide anyway, the Affordable Clean Energy Rule is a vast improvement over the Clean Power Plan.

ACE Rule Restrictions Save Consumers Money over Clean Power Plan

The ACE Rule will save American consumers $400 million per year,\(^7\) which will enable people to purchase better housing, nutrition, education, and health care. This makes life more enjoyable and saves additional human lives.

Fossil Fuels Add Net Benefit to Human Health and Welfare

More than 100 leading scholars from 12 countries recently issued a report documenting that “the global war on fossil fuels ... was never founded on sound science or economics” and urging the world’s policymakers to “acknowledge this truth and end that war.” The Nongovernmental International Panel on Climate Change (NIPCC), an independent organization founded in 2003 to fact-check the work of the United Nations on the issue of climate change, released the Summary for Policymakers of *Climate Change Reconsidered II: Fossil Fuels*.\(^8\) The 27-page Summary provides an early look at a soon-to-be-released 1,000-page report.

In the new NIPCC report, 117 scientists, economists, and other experts address and refute the United Nations’ Intergovernmental Panel on Climate Change (IPCC) assertions that the impacts of climate change on human well-being and the natural environment justify dramatic reductions in the use of fossil fuels. The Summary provides more than 100 references to peer-reviewed literature, while the full report provides nearly 3,000 such references.

Among the findings reported in the *Summary for Policymakers*:

- **Fossil fuels deliver affordable, plentiful, and reliable energy that is closely associated with key measures of human development and human welfare.** There is a strong positive relationship between low energy prices and economic prosperity. Economic prosperity in turn is crucial to human health and welfare. Wind and solar power are incapable of delivering the affordable, plentiful, and reliable energy that is delivered by fossil fuels.
- **Fossil fuels require the development of substantially less surface area than renewable energy sources, rescuing precious wildlife habitat from development.** The power density of


fossil fuels enables humanity to meet its need for energy, food, and natural resources while using less surface space. This allows the preservation of more land for wildlife habitat. In 2010, fossil fuels utilized roughly the same surface area as devoted to renewable energy sources yet delivered 110 times as much power, and did so at just one-third of the cost of solar power.9

- **The environmental and human welfare impacts of fossil fuels are overwhelmingly positive.** Sixteen of 25 identified impacts of fossil fuels are net positive. Eight are uncertain, only one is net negative. Some of the identified impacts include increased agricultural production, improved air quality, fewer extreme weather events, better human health, and longer human lifespans.
- **Reducing fossil fuel use to achieve dramatic reductions in carbon dioxide emissions would inflict tremendous economic hardship.** Reducing greenhouse gases to 90 percent below 1990 levels by 2050, as suggested by the IPCC, would require a 96% reduction in world GDP, reducing per-capita GDP to $1,200 from $30,600 now forecast. Per-capita income would be at about the level it was in the United States and Western Europe in about 1820 or 1830, before the Industrial Revolution.

**Conclusion**

It is ironic that environmental extremists vilify the very entities –fossil fuels – that have provided the economic ability to provide substantial life-saving and life-enhancing benefits. President Trump, however, campaigned on a pledge to end the war on fossil fuels. The American people voted, and they voted for fossil fuels, economic growth, and good jobs.

The ACE Rule is vastly superior to the Clean Power Plan. America elected President Trump with positive actions like this in mind. The Heartland Institute strongly urges you to implement the proposed ACE Rule.

Sincerely,

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