

Testimony of Ernest Reed, Jr.
on the EPA Clean Power Plan
November 18, 2015

Good morning!

My name is Ernie Reed and I am speaking on behalf of Virginia Organizing, Friends of Nelson, and Wild Virginia. Wild Virginia, advocates for conservation and preservation of Virginia's national forests. Friends of Nelson for the protection of community and natural resources in Nelson County, Virginia. And Virginia Organizing who makes all this possible.

In speaking today on the EPA Clean Power Plan, I will focus on how this plan in its current form is ultimately a direct threat to all.

The EPA Clean Power Plan has been proposed at exactly the same time that an excess supply of natural gas is available in the Marcellus Shale region of West Virginia, Ohio and Pennsylvania. This supply of gas is available only because of fracking technologies that have been ruled exempt from the Clean Air Act, the Clean Water Act and Safe Drinking Water Act. As a result there is an incentive for energy companies to extract natural gas as quickly as possible and to greatly increase natural gas infrastructure to get gas to market while externalizing the huge environmental impacts and avoiding liability.

Currently there are 4 proposed natural gas pipelines in Virginia that would create almost 2000 miles of new pipeline infrastructure and over a dozen compressor stations. We and

Virginians everywhere are concerned for the impacts that these pipelines will have across the Commonwealth, not the least of which is carbon-air pollution from the resulting methane leakage and end-use burning of the huge supply of natural gas. I am one of literally thousands of landowners currently facing the prospect of eminent domain proceedings and a 42" high compression pipeline on my property only a stones throw from my home.

But Virginia is just the tip of the iceberg. Industry reports document no less than 17 pipeline projects meant to ship about 17.3 billion cubic feet per day of natural gas out of Pennsylvania, West Virginia and Ohio to end-users, (according to IHS Energy: <http://powersource.post-gazette.com/powersource/companies/2015/06/23/Marcellus-Shale-region-to-see-wave-of-large-pipeline-projects/stories/201506090010> .)

EPA should not allow the Clean Power Plan to be used as justification for this, the largest taking of private land rights in our lifetime. In reality the vast majority of this gas will be exported, profiting the natural gas industry and passing the infrastructure costs to ratepayers.

Similarly, the EPA can choose to not allow the Clean Power Plan to be used as justification for burning Virginia's forests in biomass incinerator/generators.

All this is being done with the promise of cleaner air and reductions in greenhouse gas emissions. Nothing could be farther from the truth.

Biomass burning for energy generation releases more particulates and carbon per unit of energy generated than any

fossil fuel source. This is particularly problematic in low-income communities where these facilities reside.

Methane releases are dramatically problematic as methane is a 86x stronger heat-trapping gas than carbon dioxide over 20 years. And researchers find that assuming a conservative methane leakage rate of 1.5% and using full life cycle analysis, this volume will both increase net carbon emissions and slow the process of decarbonization, primarily by delaying deployment of renewable energy technologies (Shearer et al, 2014).

As you know, even with the best intentions of the EPA Clean Power Plan, the United States has no comprehensive National Energy Policy that relates to this huge build out of carbon fuel infrastructure and no analysis of its total impacts on air quality and carbon emissions.

In Virginia we have been advocating for a comprehensive NEPA-compliant Programmatic Environmental Impact Statement that would analyze

- The domestic need for this proposed infrastructure and for the gas that all of these proposed pipelines would carry
- Full life-cycle carbon impacts from this proposed infrastructure including extraction, storage, transportation, combustion and liquification for export
- Relative costs and benefits of other energy alternatives

This PEIS would be important for the present and for the future. It would provide the basis for a rational, common-sense and vital energy policy that we currently lack. The EPA could and should advocate for this PEIS as part of the Clean Power Plan.

In conclusion:

We need a clean power plan that doesn't incentivize dangerous and unnecessary new gas pipeline infrastructure.

We need a clean power plan that considers full life-cycle accounting of any fuel source.

We need a clean power plan that does not clearcut our forests for fuel or for duplicative pipeline corridors.

We need a clean power plan that doesn't inequitably impact communities where the emissions are most concentrated.

We need a clean power plan that recognizes that natural gas, like biomass generation, is a false solution.

We need a clean power plan that rewards large-scale energy efficiency and community-scale renewable technologies.

Finally we need a clean power plan that keeps our forests and our communities standing strong against climate change.

Thank you.

Ernest Reed, Jr.
On behalf of Virginia Organizing
President, Wild Virginia
Vice President, Friends of Nelson
803 Stonehenge Avenue
Charlottesville, VA 22902

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