

February 20, 2013

Dear Sen. Whitehouse and Rep. Waxman:

FCNL is delighted that you have formed the bicameral Task Force on Climate Change. We are thankful for your leadership on climate disruption - the greatest challenge humanity has ever faced – and look forward to working with you to ensure that Congress does its part to address it. We are honored to be invited to respond to the questions you have posed.

In recognition of the gravity and immensity of climate disruption, the questions posed first merit contextual background – much of which you know all too well – yet bears repeating, for without it, the tangible paths of specific negotiations and actions in present day circumstances can turn in unexpected directions or end in inadequate places.

Context

As you know, the scientific community feels the world is unable to stay below the 2 degree Celsius target that the global political establishment set in Copenhagen as the maximum global temperature increase acceptable to avoid serious and catastrophic disruptions of Earth's ecosystems and in turn human societal systems. Some scientists, observing and monitoring present day manifestations of climate disruption, feel that this target is now too lenient. Other scientists think it's too late to prevent catastrophic consequences on human civilization even if world GHG emissions halted right now.

Yet human civilization is increasing global GHG emissions in quantities exceeding the worst case scenario posited in the IPCC's Fourth Assessment Report. The International Energy Agency says we must keep in the ground 2/3^{rds} of the world's proven fossil fuel reserves to prevent catastrophe, yet some nations and corporations aggressively and successfully pursue policies to the contrary. Few if any national or international policies are in place to abate these trends. Grim is the understated description of these circumstances.

What must be done?

The ideal and mandatory goal is for the world to urgently and dramatically reduce global greenhouse gas emissions (e.g., by transitioning to renewable energy sources, energy efficient buildings and technologies, and protection of carbon sinks like rainforests), and for significant resources and expertise to be directed towards building the resilience of human infrastructure and critical ecosystems to prepare for and withstand the impacts of phenomena generated or exacerbated by climate disruption. With regard to the first aspect of this goal, some suggest reductions more ambitious than that proposed in prior comprehensive climate legislation, e.g., 80% reductions in global GHG emissions by 2025, not 2050.

A fundamental (though not singular) catalyst for these necessary development is for President Obama to obtain legally binding commitments from other world leaders towards substantial GHG emission reductions, likely rendered from UNFCCC negotiations. He can only be successful if he comes to those negotiations with demonstrable national commitments of similar celerity and scale. The foundation supporting these politicalb actions lies in the mass national support and mobilization across society akin on a physical scale to the Marshall Plan, and on a moral scale to national and global efforts to abolish slavery as a legal institution.

That kind of national commitment cannot be rendered solely by executive powers. Congressional legislation is likely required for example, to put a price on carbon pollution, establish a national clean energy standard and a more energy efficient national building code, eliminate subsidies for fossil fuels, and facilitate the transition towards a renewable energy infrastructure.

Political Limitations

Prevailing political opinion posits that nothing remotely of this sort is going to manifest in the 113rd Congress, and that Executive actions are by far the more viable options for manifesting incremental reductions in national GHG emissions. The requisite populare support is not yet present. This opinion may explain why the 3 questions posed are focused on actions that could be undertaken by the federal agencies.

We must explore and undertake such actions because they are indeed more politically viable. But mindful of the vast challenge before us, we also recognize the inherent limitations of a primarily federal agency approach towards realizing the in seeking to meet the goal, we must also work on matters not considered presently politically viable, or considered directly applicable or relevant to the enactment of meaningful Congressional legislation. This will be discussed later in this document.

Responses to Questions

In the meantime, responding directly to **Question 1**, FCNL supports the promulgation of regulations under the Clean Air Act which would sharply reduce carbon pollution from existing power plants. FCNL is generally supportive of the strategy proposed by NRDC, hopes EPA will consider their approach, and hopes to be involved in designs that ensure substantial GHG emission reductions and do not have disproportionate impacts on low-income and people of color communities.

The agencies can also increase their respective percentages of purchase and use of renewable energy under their existing renewable portfolio standards. As government funded research and development of renewable energy sources is lauded by industry as a critical component of innovation in this field, sustained, if not increased funding should be provided.

As energy efficiency is the cheapest and fastest way to reduce GHG emissions (through reduction in energy demand), all federal agencies should undertake to fullest extent of their existing authorities, repurposing of funding, and through voluntary programs and incentives, to mandate and support energy efficiency standards and practices for buildings and processes under their jurisdiction, and require or promote energy efficiencies in manufacturing processes, appliances, and other energy using products. Federal purchasing requirements should have where not already extant, criteria that considers the carbon footprint of competing processes, materials, and products where such accounting already occurs, and call for such accounting where it does not.

In response to **Question 2**, FCNL lauds the efforts undertaken pursuant to Executive Order 13514, noting in particular the work of CEQ's Climate Adaptation Task Force and the affected federal agencies to consolidate common areas of interest into interagency efforts in partnership with state, local and tribal governments and others to increase resilience in ecosystems and infrastructures. FCNL also lauds the individual agency efforts to incorporate climate change into their existing policies and programs. We note in particular USAID's forward thinking and candid approach to climate change in their mission to assist in the development of nations disproportionately impacted by it.

We urge that support be provided to tribal governments to ensure adequate representation in the multiple advisory councils, and that funding be provided to ensure they are involved in the development and implementation of multi-jurisdictional and regional climate adaptation plans. Further, because only a handful of the 566 federally recognized tribes have climate adaptation plans (compared to the majority of states) that they may be provides expertise and funding create their own climate adaptation plans. We also urge the federal government designate a lead federal agency and focus specific funding on the relocation of the 31 Alaska Native Villages which already qualify for relocation due to eroding shorelines and flooding caused by climate change.

Finally, there is a growing awareness of the cost and operational effectiveness of non-structural aspects of climate adaptation, such as emergency management and planning, multi-jurisdictional coordination of first responders, fire-fighters, and health care professionals. Increased focus on other "non-concrete" adaptive measures, such as fire adaptive building codes, terracing and bending of river beds, and thinning of forest stands near physical structures, should be promoted. Federal agencies whose missions delve into these areas (such as FEMA, USFS, HHS, and HUD) can facilitate the quantity and quality of those efforts across the nation.

In response to **Question 3**, FCNL recognizes the distressing levels of partisanship extant in the 113th Congress, which is one of several sizeable factors threatening if not prohibiting the enactment of legislative solutions that would demonstrate meaningful progress on the first step of the ideal scenario described above.

We recognize that Congressional action "to strengthen the ability of federal agencies to prevent and respond to the effects of climate change" may be manifest more as a defensive rather than strengthening posture. Nevertheless, assuming strengthening is possible, the recommendations

provided in Questions 1 and 2 can benefit from Congressional support through the increase of appropriations for the recommended policies and activities, and thwarting of political opposition to EPA authority to promulgate Clean Air Act regulations of carbon pollution from existing sources.

From a tonal or thematic perspective, we reference for your consideration, successful actions and approaches by local, city, county and state governments to build resilience and increase renewable energy development. These actions have and are being undertaken often despite political opposition to the very concept of climate change, when they packaged as anything other than actions associated with the climate change. For example, such efforts are labelled as infrastructural improvements, building resilience to extreme weather events, cost savings and returns on investment through energy efficiency or solar panel installations. Academic research is finding that local support of climate change related activities is garnered by the localization or personalization of climate impacts, and focused upon resiliency, not mitigation. Furthermore, active involvement in resilience activities then cultivates support for mitigation.

These demonstrably successful efforts and the research affirm an approach that is contrary to approaches pursued by national climate advocates in the past. In other words, to obtain popular and enduring support for climate related activities, the approach is bottom up and specific, not top down and national, focussed first on resilience, not mitigation, and not necessarily having to have buy-in to the concept of climate change.

These approaches can and should be explored in this Congress, and not specifically limited to enhancing federal agency responses to climate impacts. Congressional members in states and districts perennially beset by droughts, floods, wild-fires, declining water tables, salinized aquifers, and declining fish stocks, might be more amendable to Congressional legislation creating or bolstering meaningful legislative responses that are de facto, but not de jure mitigative and adaptive responses to climate disruption. The persistence, duration, and intensity of climate change generated or exacerbated phenomena is likely to make more Congressional members, regardless of political affiliation, more amenable to solutions. If those solutions can be realized without being couched in the climate change frame, so be it, for it is better to have the solution without the label than no solution at all.

Seeking Improvements in the Larger Context

FCNL recognizes that executive action alone or legislation in this Congress focused primarily on resilience and without climate change “labeling” (perhaps the most viable products in this political atmosphere) will not meet the national goals for urgent and dramatic GHG emission reduction necessary to obtain commensurate international goals. The incremental steps are necessary in this political environment, but far more will be needed, and soon.

At some point in the near future, far sooner than later, the nation must have sufficient *bi-partisan* recognition of the gravity of the challenge before us as a nation, world, and species. There must be

a political and philosophical tipping point towards a global ecological awareness that manifests into sufficient global commitment to the necessary urgent and dramatic action necessary to avert potential global civilizational collapse. Those potential and existential horrors at the forefront of the minds of many climate advocates, regrettably but necessarily, must be realized by others, and in sufficient quantity where a sufficient number of people can look around and then believe there's enough momentum to engage in solutions. Until then we're stuck where we are: broad but shallow concern by the American population, and the thin sliver that is the climate advocacy harboring deep and existential concern – neither enough at this time to engender the necessary action.

The Faith Perspective

Focusing only on the challenge of partisanship in Congress (but applicable in other dimensions), if the issue is not whether we can nurture a legislative plant to bear fruit, but more fundamentally whether the political environment is such that the plant cannot grow, or that the seed cannot be even planted, we must seek to understand where and why the conditions are unfavorable, and nurture them back to health. These are challenges related to attitudes, approaches and perspectives, which need to be addressed, for the fruit to manifest.

One strategy being considered by FCNL and others in the faith community towards this challenge, provided for your information, is the following. We set aside at present, outreach to members of Congress adamantly opposed to very existence of the concept of climate change, and focus on those with an awareness but not the present political space to official express that sentiment. Second, the approach to those latter kinds of individuals should be undertaken as a non-partisan, non-judgmental, moral call to partnership, and seeking first to understand where that individual stands. Interactions would occur on the Hill but more critically, by a substantial number of constituents in the individual's district or state in a coordinated fashion. Success could be as modest as that individual feeling an increased need to express some form of concern about climate change. This proposed strategy is provided as a complement to the more tangible actions pursued by others and suggested above, for FCNL and others do not believe it prudent, given the prevailing political opinions, to completely ignore Congress, and believe it critical to cultivate relationships and hopes for the members of the institution indispensable to efforts to address climate disruption.

Messaging and Mobilizing by the Civil Sector

A second related approach being undertaken, relates to messaging, messengers, and the massive mobilization stated above and recognized by many climate advocates. At present, climate change is predominantly viewed by the American public as an environmental issue, and advocated primarily by environmental organizations. Some organizations in the faith community, as well as other organizations in other sectors not typically affiliated with climate change or environmentalism, are increasingly expressing their concerns about climate change, thus broadening the message and dissolve prevailing notions.

Climate change is not just an environmental issue. It is indeed, among other things, a health, moral, food, water, agricultural, human health and national security issue. These dimensions, expressed

by sectors immersed in these dimensions, must be elevated and supported as separate notes in the chord of climate advocacy. Many recognize that these non-traditional sectors of climate advocacy – including faith, farming, peoples of color and youth, military, insurance, architects, business, and state, tribal and local governments – are indispensable towards the creation of the needed social movement.

Two efforts in this regard in which FCNL is involve are: 1) the development of Congressional briefings highlighting these other sectors (including one scheduled for March 18th involving people of color communities and tribal governments (including NAACP, NCAI and JACL)); and 2) the Climate Summit coalition, in which representative from many of the diverse sectors mentioned above, are calling for the President to host a summit highlighting and catalyzing existing solutions implemented by communities, businesses, governments, and others. These are modest yet necessary steps we believe must be undertaken to improve the prospects of meaningful Congressional legislation, and to remain focused on the need to energize and mobilize our nation and world on the ideal and mandatory goal of urgent and dramatic reductions in global greenhouse gas emissions.

Thank you for the opportunity to share our views, and for your due consideration. We look forward to your thoughts and to continued collaboration.