

Comment by:

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on the

**Standards of Performance for Greenhouse Gas Emissions from New Stationary
Sources: Electric Utility Generating Units**

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I. Summary

This passage from the EPA’s “Regulatory Impact Analysis for the Proposed Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility Generating Units” sums up the intent and justification of the proposed standards.

“While sector-wide modeling does not project any new coal-fired EGUs [electric generating units] without CCS [carbon capture and storage] to be built in the absence of this proposal, we recognize that a few companies may choose to construct coal or other solid fossil fuel-fired units. In Chapter 5 of this RIA we present an analysis of the project-level costs of a new coal-fired unit with and without CCS, and estimate the social benefits of requiring CCS on a new uncontrolled unit. We also present a sensitivity analysis indicating that even in the unlikely event that market conditions change sufficiently to make the widespread construction of new conventional coal-fired units economical from the perspective of private investors, this rule would result in net benefits from avoided negative health and environmental effects.”

As we will show, this justification fails in virtually all of its aspects:

- 1) the social cost of carbon (SCC) estimates used by the EPA to compare project-level costs of new coal-fired power plants with and without CCS technology are overinflated and thus wrongly favor the adaptation of CCS;
- 2) the Rule would not result in net benefits from avoided negative health effects as human health is improving—partially as a result of climate change; and
- 3) the Rule would not result in net benefits from avoided negative environmental effects as the environmental impacts of the Rule are negligible and scientifically undetectable.

As a consequence, this proposed standard should be withdrawn and not revisited.

II. Social Cost of Carbon

The determination of the SCC used by the EPA in its cost comparison analysis is discordant with the best scientific literature on the equilibrium climate sensitivity and the fertilization effect of carbon dioxide—two critically important parameters for establishing the net externality of carbon dioxide emissions—at odds with existing Office of Management and Budget (OMB) guidelines for preparing regulatory analyses, and founded upon the output of Integrated Assessment Models (IAMs) which encapsulate such large uncertainties as to provide no reliable guidance as to the sign, much less the magnitude of the social cost of carbon. Additionally, as run by the Interagency Working Group (IWG) (whose results were incorporated by the EPA in this action), the IAMs produce illogical results that indicate a misleading disconnect between a climate change and the SCC value. And we show that the sea level rise projections (and thus SCC) of at least one of the IAMs (DICE 2010) cannot be supported by the mainstream climate science.

Until this situation in its entirety can be properly rectified, the SCC should be barred from use in this and any other federal rulemaking. It is better not to include any value for the SCC in cost/benefit analyses such as these, than to include a value which is knowingly improper, inaccurate and misleading.

A. Domestic vs. Global Costs

The IWG only reports the *global* value of the SCC which the IWG determines to accrue from continued carbon dioxide emissions in the United States. This is in direct violation of existing Office of Management and Budget (OMB) guidelines.

OMB Circular A-4 (September 17, 2003) regarding Regulatory Analysis explicitly states:

Your analysis should focus on benefits and costs that accrue to citizens and residents of the United States. Where you choose to evaluate a regulation that is likely to have effects beyond the borders of the United States, these effects should be reported separately.

In reporting the SCC, the IWG argues away the need to “focus on benefits and costs that accrue to citizens and residents of the United States” and instead bases its SCC solely on its determinations of “effects beyond the borders of the United States.” Rather than reporting the latter “separately,” as recommended by OMB guidelines, the IWG only reports the global costs and makes no determination of the domestic costs. Considering that the majority (if not all) of the federal regulations incorporating the SCC into cost/benefit analysis apply to rules regulating domestic activities (including this one), reporting only the global impact—the knowledge (in all areas, i.e., economics, social, environmental, etc.) of which is far less constrained than potential U.S. impacts—imparts a huge degree of uncertainty and is a grossly misleading. Thus, the IWG’s determination of the SCC is not appropriate for use in this or any federal regulatory analysis.

During the public comment period associated with new regulations such as this one which incorporate the SCC, a distinction should be made between domestic costs/benefits and foreign cost/benefits such that the public can judge for itself the value of the regulation. As it currently stands, the public likely has no idea that the benefits of the proposed regulations on *domestic* activities that supposedly accrue from incorporating the SCC are largely conferred upon *foreign* nations. This is clearly not a “transparent” situation.

B. Discount Rates

In the same manner, the IWG ignores OMB guidelines in its selection of discount rates to use in calculating the SCC. OMB Circular A-4 refers to OMB Circular A-94 which states that “a real discount rate of 7 percent should be used as a base-case for regulatory analysis” and to show the sensitivity of the results to the discount rate assumptions “[f]or regulatory analysis, you should provide estimates of net benefits using both 3 percent and 7 percent.”

Instead, the IWG opted to determine the SCC using discount rates of 2.5, 3, and 5 percent, and did not include results for a 7 percent rate.

This has ramifications throughout the federal regulatory agencies. For example, in previous Environmental Protection Agency discussions of a proposed new rule regulating discharges from steam electric power plants (and how the rule may impact emissions from the plants), the EPA included a Table of the annualized benefits of the emissions reductions from NO_x, SO₂, and CO₂. Following OMB guidelines on how to calculate costs and benefits—the EPA reports its findings using both a 3% and a 7% discount rate. Yet as explained in a footnote to the Table (see below), the CO₂ benefits are calculated using the 3% and the 5% discount rate “because SCC calculations are not available for the 7 percent discount rate.” The reason they are “not available” is that the IWG ignored the OMB guidelines and did not provide the SCC at a 7 percent discount rate for use in regulator analyses.

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| summarizes the annualized benefits emissions. Chapter 8 in the BCA report associated with changes in air pollutant provides the details of this analysis. | | |
| TABLE XIV-6—ANNUALIZED BENEFITS OF CHANGES IN NO _x , SO ₂ , AND CO ₂ AIR EMISSIONS [Million 2010\$] ^a | | |
| Discount rate | Option 3 | Option 4 |
| 3% Discount Rate (for NO _x , SO ₂ , and CO ₂ -related benefits) | \$127.6 | \$170.5 |
| 7% Discount Rate (for NO _x , SO ₂ , and CO ₂ -related benefits) ^{a,b} | 82.3 | 74.6 |
| ^a Because SCC values are not available for the 7 percent discount rate, EPA used the SCC based on a 5 percent discount rate to estimate values presented for the 7 percent discount rate. EPA uses 5 percent to discount CO ₂ -related benefits and 7 percent to discount benefits from changes in NO _x and SO ₂ emissions. | | |

This leads to an absurd situation. Regulatory agencies, like the EPA, have in the past, tried to follow the rules and calculate cost and benefits using both the 3 percent and 7 percent discount rates. Yet, when they express the benefits of reducing carbon dioxide emissions at the recommended 7 percent rate, they are actually going to use a number that is incorrect and inaccurate, and explain in a footnote why they are doing so. This is an unacceptable excuse, and is yet another example of why the IWG’s determination of the SCC is inappropriate for use in federal regulatory analyses.

In this proposed Rule, the EPA does not investigate the results of using a 7% discount rate on the comparison of new coal-fired power plants with and without CCS technology in direct violation of OMB guidelines.

C. Equilibrium Climate Sensitivity

In May 2013, the Interagency Working Group (IWG) produced an updated SCC value by applying updates to the underlying three Integrated Assessment Models (IAMs) used in its initial 2010 SCC determination, but did not update the equilibrium climate sensitivity (ECS) employed in the IAMs. This was not done, despite there having been, since January 1, 2011, at least 11 new studies and 17 experiments (involving more than 44 researchers) examining the ECS, each lowering the best estimate and tightening the error distribution about that estimate. Instead, the IWG wrote in its 2013 report: “It does not revisit other interagency modeling decisions (e.g., with regard to the discount rate, reference case socioeconomic and emission scenarios, or equilibrium climate sensitivity).”

The earth’s equilibrium climate sensitivity is defined in the Interagency Working Group on Social Cost of Carbon 2010 (hereafter, IWG2010) report as “the long-term increase in the annual global-average surface temperature from a doubling of atmospheric CO₂ concentration relative to pre-industrial levels (or stabilization at a concentration of approximately 550 parts per million (ppm))” and is recognized as “a key input parameter” for the integrated assessment models used to determine the social cost of carbon.

The IWG2010 report has an entire section (Section III.D) dedicated to describing how an estimate of the equilibrium climate sensitivity and the scientific uncertainties surrounding its actual value are developed and incorporated in the IWG’s analysis. The IWG2010, in fact, developed its own probability density function (pdf) for the ECS and used it in each of the three IAMs, superseding the ECS pdfs used by the original IAMs developers. The IWG’s intent was to develop an ECS pdf which most closely matched the description of the ECS as given in the

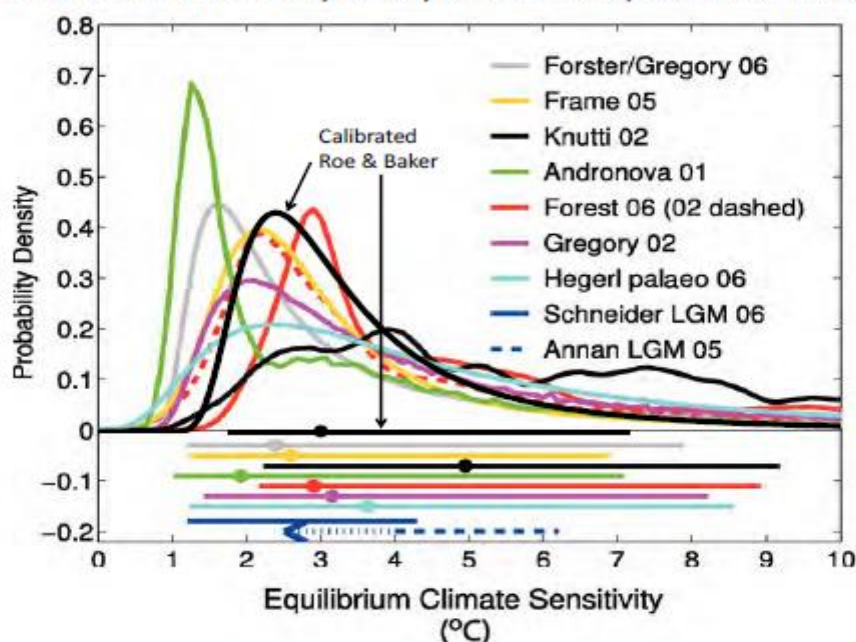
Fourth Assessment Report of the United Nation's Intergovernmental panel on Climate Change which was published in 2007.

The functional form adopted by the IWG2010 was a calibrated version of Roe and Baker (2007) distribution. It was described in the IWG2010 report in the following Table and Figure (from the IWG2010 report):

Table 1: Summary Statistics for Four Calibrated Climate Sensitivity Distributions

| | Roe & Baker | Log-normal | Gamma | Weibull |
|--------------------------------------|-------------|------------|-------|---------|
| Pr(ECS < 1.5°C) | 0.013 | 0.050 | 0.070 | 0.102 |
| Pr(2°C < ECS < 4.5°C) | 0.667 | 0.667 | 0.667 | 0.667 |
| 5 th percentile | 1.72 | 1.49 | 1.37 | 1.13 |
| 10 th percentile | 1.91 | 1.74 | 1.65 | 1.48 |
| Mode | 2.34 | 2.52 | 2.65 | 2.90 |
| Median (50 th percentile) | 3.00 | 3.00 | 3.00 | 3.00 |
| Mean | 3.50 | 3.28 | 3.19 | 3.07 |
| 90 th percentile | 5.86 | 5.14 | 4.93 | 4.69 |
| 95 th percentile | 7.14 | 5.97 | 5.59 | 5.17 |

Figure 2: Estimates of the Probability Density Function for Equilibrium Climate Sensitivity (°C)

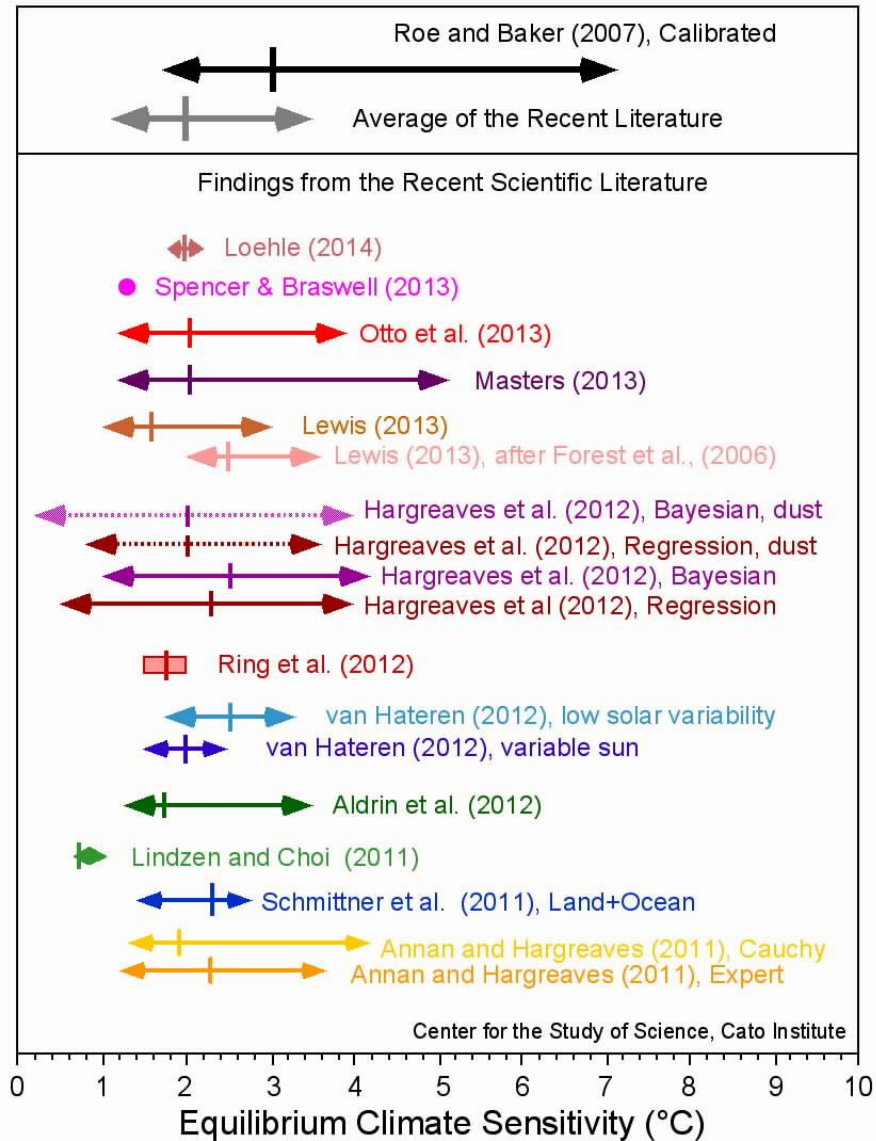


The calibrated Roe and Baker functional form used by the IWG2010 is *no longer scientifically defensible*; neither was it at the time of the publication of the IWG 2013 SCC update.

The figure below vividly illustrates this fact, as it compares the best estimate and 90% confidence range of the earth's ECS as used by the IWG2010/2013 (calibrated Roe and Baker) against findings in the scientific literature published since January 1, 2011.

Whereas the IWG2010/2013 ECS distribution has a median value of 3.0°C and 5th and 95th percentile values of 1.72°C and 7.14°C, respectively, the corresponding values averaged from the recent scientific literature are 2.0°C (median), 1.1°C (5th percentile), and 3.5°C (95th percentile).

These differences will have large and significant impacts on the SCC determination.



CAPTION: Climate sensitivity estimates from new research beginning in 2011 (colored), compared with the assessed range given in the Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report (AR5) and the collection of climate models used in the IPCC AR5. The “likely” (greater than a 66% likelihood of occurrence) range in the IPCC Assessment is indicated by the gray bar. The arrows indicate the 5 to 95 percent confidence bounds for each estimate along with the best estimate (median of each probability density function; or the mean of multiple estimates; colored vertical line). Ring et al. (2012) present four estimates of the climate sensitivity and the red box encompasses those estimates. The right-hand side of the IPCC AR5 range is actually the 90% upper bound (the IPCC does not actually state the value for the upper 95 percent confidence bound of their estimate). Spencer and Braswell (2013) produce a single ECS value best-matched to ocean heat content observations and internal radiative forcing.

The IWG2010 report noted that, concerning the low end of the ECS distribution, its determination reflected a greater degree of certainty that a low ECS value could be excluded than did the IPCC. From the IWG2010 (p. 14):

“Finally, we note the IPCC judgment that the equilibrium climate sensitivity “is very likely larger than 1.5°C.” Although the calibrated Roe & Baker distribution, for which the probability of equilibrium climate sensitivity being greater than 1.5°C is almost 99 percent, is not inconsistent with the IPCC definition of “very likely” as “greater than 90 percent probability,” it reflects a greater degree of certainty about very low values of ECS than was expressed by the IPCC.”

In other words, the IWG used its judgment that the lower bound of the ECS distribution was higher than the IPCC 2007 assessment indicated. However, the collection of the recent literature on the ECS shows the IWG’s judgment to be in error. As can be seen in the chart above, the large majority of the findings on ECS in the recent literature indicate that the lower bound (i.e., 5th percentile) of the ECS distribution is lower than the IPCC 2007 assessment. And, the average value of the 5th percentile in the recent literature (1.1°C) is 0.62°C less than that used by the IWG—a sizeable and important difference which will influence the SCC determination.

In fact, the abundance of literature supporting a lower climate sensitivity was at least partially reflected in the new IPCC *Fifth Assessment Report* issued in 2013. In that report, the IPCC reported:

Equilibrium climate sensitivity is *likely* in the range 1.5°C to 4.5°C (*high confidence*), *extremely unlikely* less than 1°C (*high confidence*), and *very unlikely* greater than 6°C (*medium confidence*). The lower temperature limit of the assessed *likely* range is thus less than the 2°C in the AR4...

Clearly, the IWG’s assessment of the low end of the probability density function that best describes the current level of scientific understanding of the climate sensitivity is incorrect and indefensible.

But even more influential in the SCC determination is the upper bound (i.e., 95th percentile) of the ECS probability distribution.

The IWG2010 notes (p.14) that the calibrated Roe and Baker distribution better reflects the IPCC judgment that “values substantially higher than 4.5°C still cannot be excluded.” The IWG2010 further notes that

“Although the IPCC made no quantitative judgment, the 95th percentile of the calibrated Roe & Baker distribution (7.1 °C) is much closer to the mean and the median (7.2 °C) of the 95th percentiles of 21 previous studies summarized by Newbold and Daigneault (2009). It is also closer to the mean (7.5 °C) and median (7.9 °C) of the nine truncated distributions examined by the IPCC (Hegerl, et al., 2006) than are the 95th percentiles of the three other calibrated distributions (5.2-6.0 °C).”

In other words, the IWG2010 turned towards surveys of the scientific literature to determine its assessment of an appropriate value for the 95th percentile of the ECS distribution. Now, more than three years hence, the scientific literature tells a completely different story.

Instead of a 95th percentile value of 7.14°C, as used by the IWG2010, a survey of the recent scientific literature suggests a value of 3.5°C—more than 50% lower.

And this is very significant and important difference because the high end of the ECS distribution has a large impact on the SCC determination—a fact frequently commented on by the IWG2010.

For example, from IWG2010 (p.26):

“As previously discussed, low probability, high impact events are incorporated into the SCC values through explicit consideration of their effects in two of the three models as well as the use of a probability density function for equilibrium climate sensitivity. Treating climate sensitivity probabilistically results in more high temperature outcomes, which in turn lead to higher projections of damages. Although FUND does not include catastrophic damages (in contrast to the other two models), its probabilistic treatment of the equilibrium climate sensitivity parameter will directly affect the non-catastrophic damages that are a function of the rate of temperature change.”

And further (p.30):

Uncertainty in extrapolation of damages to high temperatures: The damage functions in these IAMs are typically calibrated by estimating damages at moderate temperature increases (e.g., DICE was calibrated at 2.5 °C) and extrapolated to far higher temperatures by assuming that damages increase as some power of the temperature change. Hence, estimated damages are far more uncertain under more extreme climate change scenarios.

And the entirety of Section V [sic] “A Further Discussion of Catastrophic Impacts and Damage Functions” of the IWG 2010 report describes “tipping points” and “damage functions” that are probabilities assigned to different values of global temperature change. Table 6 from the IWG2010 indicated the probabilities of various tipping points.

Table 6: Probabilities of Various Tipping Points from Expert Elicitation -

| Possible Tipping Points | Duration before effect is fully realized (in years) | Additional Warming by 2100 | | |
|---|---|----------------------------|-----------|--------|
| | | 0.5-1.5 C | 1.5-3.0 C | 3-5 C |
| Reorganization of Atlantic Meridional Overturning Circulation | about 100 | 0-18% | 6-39% | 18-67% |
| Greenland Ice Sheet collapse | at least 300 | 8-39% | 33-73% | 67-96% |
| West Antarctic Ice Sheet collapse | at least 300 | 5-41% | 10-63% | 33-88% |
| Dieback of Amazon rainforest | about 50 | 2-46% | 14-84% | 41-94% |
| Strengthening of El Niño-Southern Oscillation | about 100 | 1-13% | 6-32% | 19-49% |
| Dieback of boreal forests | about 50 | 13-43% | 20-81% | 34-91% |
| Shift in Indian Summer Monsoon | about 1 | Not formally assessed | | |
| Release of methane from melting permafrost | Less than 100 | Not formally assessed. | | |

The likelihood of occurrence of these low probability, high impact, events (“tipping points”) is *greatly* diminished under the new ECS findings. The average 95th percentile value of the new literature survey is only 3.5°C indicating a very low probability of a warming reaching 3-5°C by 2100 as indicated in the 3rd column of the above Table and thus a significantly lower probability that such tipping points will be reached. This new information will have a large impact on the final SCC determination using the IWG’s methodology.

The size of this impact has been directly investigated.

In their Comment on the Landmark Legal Foundation Petition for Reconsideration of Final Rule Standards for Standby Mode and Off Mode Microwave Ovens, Dayaratna and Kreutzer (2013) ran the DICE model using the distribution of the ECS as described by Otto et al. (2013)—a paper published in the recent scientific literature which includes 17 authors, 15 of which were lead authors of chapters in the recent Intergovernmental Panel on Climate Change’s *Fifth Assessment Report*. The most likely value of the ECS reported by Otto et al. (2013) was described as “2.0°C, with a 5–95% confidence interval of 1.2–3.9°C.” Using the Otto et al. (2013) ECS distribution in lieu of the distribution employed by the IWG (2013), dropped the SCC by 42 percent, 41 percent, and 35 percent (for the 2.5%, 3.0%, 5.0% discount rates, respectively). This is a significant decline.

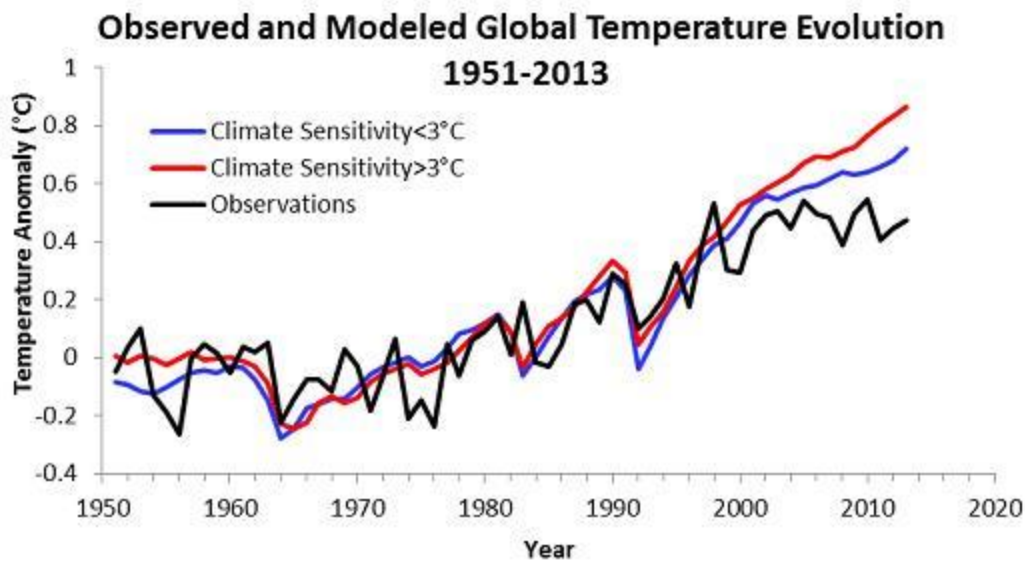
In subsequent research, Dayaratna and Kreutzer (2014) examined the performance of the FUND model, and found that it too, produced a greatly diminished value for the SCC when run with the Otto et al. distribution of the equilibrium climate sensitivity. Using the Otto et al. (2013) ECS distribution in lieu of the distribution employed by the IWG (2013), dropped the SCC produced by the FUND model to \$11, \$6, \$0 compared with the original \$30, \$17, \$2 (for the 2.5%, 3.0%, 5.0% discount rates, respectively). Again, this is a significant decline.

The Dayaratna and Kreutzer (2014) results using FUND were in line with alternative estimates of the impact of a lower climate sensitivity on the FUND model SCC determination. Waldhoff et al. (2011) investigated the sensitivity of the FUND model to changes in the ECS. Waldhoff et al. (2011) found that changing the ECS distribution such that the mean of the distribution was lowered from 3.0°C to 2.0°C had the effect of lowering the SCC by 60 percent (from a 2010 SCC estimate of \$8/ton of CO₂ to \$3/ton in \$1995). While Waldhoff et al. (2011) examined FUNDv3.5, the response of the current version (v3.8) of the FUND model should be similar.

Additionally, the developer of the PAGES model affirmed that the SCC from the PAGES model, too drops by 35% when the Otto et al. (2013) climate sensitivity distribution is employed (Hope, 2013).

These studies make clear that the strong dependence of the social cost of carbon on the distribution of the estimates of the equilibrium climate sensitivity (including the median, and the upper and lower certainty bounds) requires that the periodic updates to the IWG SCC determination must include an examination of the scientific literature on the topic of the equilibrium climate sensitivity. There is no indication that the IWG undertook such an examination. But what is clear, is that the IWG did *not* alter its probability distribution of the ECS between its 2010 and 2013 SCC determination, despite a large and growing body of scientific literature that substantially alters and better defines the scientific understanding of the earth's ECS. It is unacceptable that a supposed "updated" social cost of carbon does not include updates to the science underlying a critical and key aspect of the SCC.

We note that there has been one prominent scientific study in the recent literature which has argued, on the basis of recent observations of lower tropospheric mixing in the tropics, for a rather high climate sensitivity (Sherwood et al., 2014). This research, however, suffers from too narrow a focus. While noting that climate models which best match the apparent observed behavior of the vertical mixing characteristics of the tropical troposphere tend to be the models with high climate sensitivity estimates, the authors fail to make note that these same models are the ones whose projections make the *worst* match to observations of the evolution of global temperature during the past several decades. The figure below shows the observed global surface temperature history from 1951-2013 compared with the temperature evolution projected by the collection of models used in the new IPCC 2013 report. We broke the climate models down into two groups—those which have a climate sensitivity greater than 3.0°C (as suggested by Sherwood et al., 2014) and those with a climate sensitivity less than 3.0°C. The Figure shows that while neither model subset does a very good job is capturing evolution of global temperature during the past 15-20 years (the period with the highest human carbon dioxide emissions), the high sensitivity models do substantially worse than the lower sensitivity models.

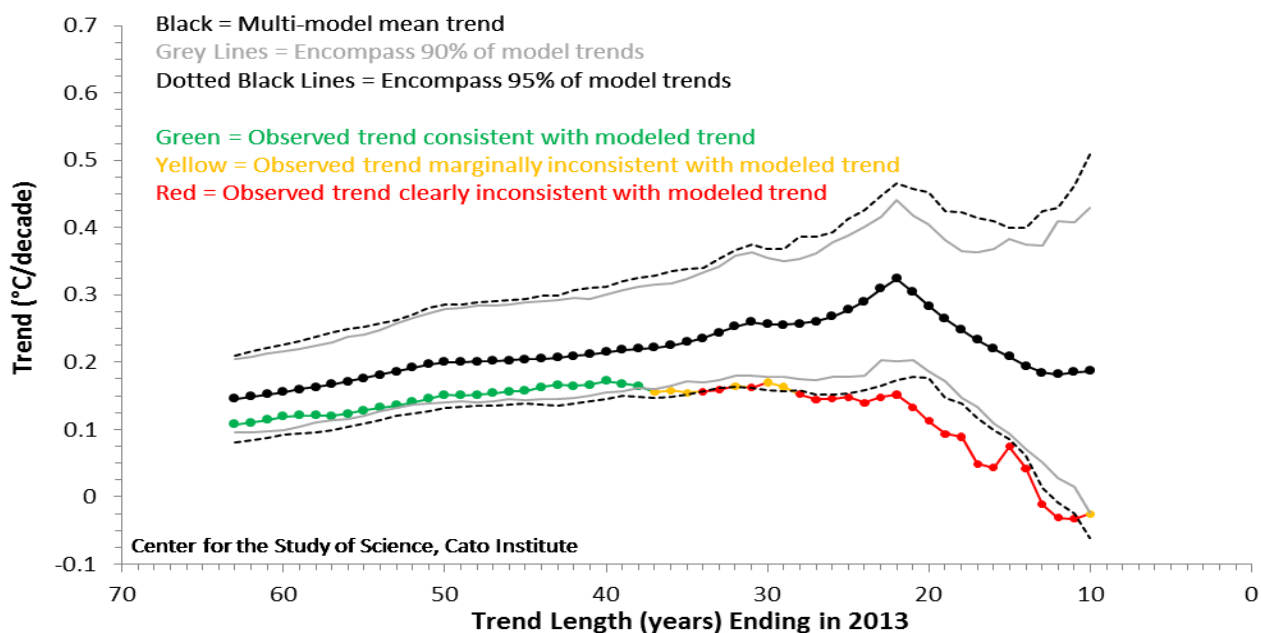


CAPTION: Observed global average temperature evolution, 1951-2013, as compiled by the U.K's Hadley Center (black line), and the average temperature change projected by a collection of climate models used in the IPCC Fifth Assessment Report which have a climate sensitivity greater than 3.0°C (red line) and a collection of models with climate sensitivities less than 3.0°C (blue line).

While Sherwood et al. (2014) prefer models that better match their observations in one variable, the same models actually do *worse* in the big picture than do models which lack the apparent accuracy in the processes that Sherwood et al. (2014) describe. The result can only mean that there must still be even bigger problems with *other* model processes which must more than counteract the effects of the processes described by Sherwood et al. After all, the overall model collective is still warming the world much faster than it actually is (see Figure below). In fact, for the observed global average temperature evolution for the past 30 years largely lies below the range which encompasses 95% of all climate model runs—an indication that the observed trend is statistically different from the trend simulated by climate models. And for periods approaching 40 years in length, the observed trend lies outside of (below) the range that includes 90% of all climate model simulations—and indication that the observed trend is marginally inconsistent with climate model simulations.

These results argue strongly against the reliability of the Sherwood et al. (2014) conclusion and instead provide robust observational evidence that the climate sensitivity has been overestimated by both climate models, and the IWG alike.

Observed vs. Modeled Surface Temperature Trends (Trends end in 2013)



CAPTION: The annual average global surface temperature from 106 individual CMIP5 climate model runs forced with historical (+ RCP45 since 2006) forcings were obtained from the [Climate Explorer](#) website. Linear trends were computed through the global temperatures from each run, ending in 2013 and beginning each year from 1951 through 2004. The trends for each period (ranging in length from 10 to 62 years) were averaged across all model runs (black dots). The range containing 90 percent (grey lines), and 95 percent (dotted black lines) of trends from the 106 model runs is also indicated. The observed linear trends for the same periods were calculated from the annual average global surface temperature record compiled by the U.K. Hadley Center ([HadCRUT4](#)) (colored dots). Observed trend values which were less than the 2.5th percentile of the model trend distribution were colored red, observed trend values which were between the 2.5th and the 5th percentile of the model trend distribution were colored yellow, and observed trend values greater than the 5th percentile of the model trend distribution were colored green.

D. Agricultural Impacts of Carbon Fertilization

Carbon dioxide is known to have a positive impact on vegetation, with literally thousands of studies in the scientific literature demonstrating that plants (including crops) grow stronger, healthier, and more productive under conditions of increased carbon dioxide concentration. A recent study (Idso, 2013) reviewed a large collection of such literature as it applies to the world's 45 most important food crops (making up 95% of the world's annual agricultural production). Idso (2013) summarized his findings on the increase in biomass of each crop that results from a 300ppm increase in the concentration of carbon dioxide under which the plants were grown. This table is reproduced below, and shows that the typical growth increase exceeds 30% in most

crops, including 8 of the world's top 10 food crops (the increase was 24% and 14% in the other two).

Average percentage increase in biomass of each of the world's 45 most important food crops under an increase of 300ppm of carbon dioxide.

| Crop | % Biomass Change | Crop | % Biomass Change |
|------------------------------|------------------|--------------------------------|------------------|
| Sugar cane | 34.0% | Rye | 38.0% |
| Wheat | 34.9% | Plantains | 44.8% |
| Maize | 24.1% | Yams | 47.0% |
| Rice, paddy | 36.1% | Groundnuts, with shell | 47.0% |
| Potatoes | 31.3% | Rapeseed | 46.9% |
| Sugar beet | 65.7% | Cucumbers and gherkins | 44.8% |
| Cassava | 13.8% | Mangoes, mangosteens, guavas | 36.0% |
| Barley | 35.4% | Sunflower seed | 36.5% |
| Vegetables fresh nes | 41.1% | Eggplants (aubergines) | 41.0% |
| Sweet potatoes | 33.7% | Beans, dry | 61.7% |
| Soybeans | 45.5% | Fruit Fresh Nes | 72.3% |
| Tomatoes | 35.9% | Carrots and turnips | 77.8% |
| Grapes | 68.2% | Other melons (inc.cantaloupes) | 4.7% |
| Sorghum | 19.9% | Chillies and peppers, green | 41.1% |
| Bananas | 44.8% | Tangerines, mandarins, clem. | 29.5% |
| Watermelons | 41.5% | Lettuce and chicory | 18.5% |
| Oranges | 54.9% | Pumpkins, squash and gourds | 41.5% |
| Cabbages and other brassicas | 39.3% | Pears | 44.8% |
| Apples | 44.8% | Olives | 35.2% |
| Coconuts | 44.8% | Pineapples | 5.0% |
| Oats | 34.8% | Fruit, tropical fresh nes | 72.3% |
| Onions, dry | 20.0% | Peas, dry | 29.2% |
| Millet | 44.3% | | |

Idso (2013) found that the increase in the atmospheric concentration of carbon dioxide that took place during the period 1961-2011 was responsible for increasing global agricultural output by 3.2 trillion dollars (in 2004-2006 constant dollars). Projecting the increases forward based on projections of the increase in atmospheric carbon dioxide concentration, Idso (2013) expects carbon dioxide fertilization to increase the value of agricultural output by 9.8 trillion dollars (in 2004-2006 constant dollars) during the 2012-2050 period.

This is a large positive externality, and one that is insufficiently modeled in the IAMs relied upon by the IWG in determining the SCC.

In fact, only one of the three IAMs used by the IWG has any substantial impact from carbon dioxide fertilization, and the one that does, underestimates the effect by approximately 2-3 times.

The FUND model has a component which calculates the impact on agriculture as a result of carbon dioxide emissions, which includes not only the impact on temperature and other climate changes, but also the direct impact of carbon dioxide fertilization. The other two IAMs, DICE and PAGE by and large do not (or only do so extremely minimally; DICE includes the effect to a larger degree than PAGE). Consequently, lacking this large and positive externality, the SCC calculated by the DICE and PAGE models is significantly larger than the SCC determined by the FUND model (for example, see Table A5, in the IWG 2013 report).

But even the positive externality that results from carbon dioxide fertilization as included in the FUND model is too small when compared with the Idso (2013) estimates. FUND (v3.7) uses the following formula to determine the degree of crop production increase resulting from atmospheric carbon dioxide increases (taken from Anthoff and Tol, 2013a):

CO₂ fertilisation has a positive, but saturating effect on agriculture, specified by

$$(A.4) \quad A_{t,r}^f = \gamma_r \ln \frac{CO2_t}{275}$$

where

- A^f denotes damage in agricultural production as a fraction due to the CO₂ fertilisation by time and region;
- t denotes time;
- r denotes region;
- $CO2$ denotes the atmospheric concentration of carbon dioxide (in parts per million by volume);
- 275 ppm is the pre-industrial concentration;
- γ is a parameter (see Table A, column 8-9).

Column 8 in the table below shows the CO₂ fertilization parameter (γ_r) used in FUND for various regions of the world (Anthoff and Tol, 2013b). The average CO₂ fertilization effect across the 16 regions of the world is 11.2%. While this number is neither areally weighted, nor

weighted by the specific crops grown, it is clear that 11.2% is much lower than the average fertilization effect compiled by Idso (2013) for the world's top 10 food crops (35%). Further, Idso's fertilization impact is in response to a 300ppm CO₂ increase, while the fertilization parameter in the FUND model is multiplied by $\ln(\text{CO}_2/275)$ which works out to 0.74 for a 300ppm CO₂ increase. This multiplier further reduces the 16 region average to 8.4% for the CO₂ fertilization effect—some 4 times smaller than the magnitude of the fertilization impact identified by Idso (2013).

Impact of climate change on agriculture in FUND model.

| | Rate of change (% Ag. Prod/ 0.04°C) | | δ_r^l | | δ_r^q | | CO ₂ fertilisation (% Ag. Prod) | |
|-----|---|---------|--------------|---------|--------------|---------|---|---------|
| USA | -0.021 | (0.176) | 0.026 | (0.021) | -0.012 | (0.018) | 8.90 | (14.84) |
| CAN | -0.029 | (0.073) | 0.092 | (0.080) | -0.016 | (0.009) | 4.02 | (6.50) |
| WEU | -0.039 | (0.138) | 0.022 | (0.002) | -0.014 | (0.013) | 15.41 | (11.83) |
| JPK | -0.033 | (0.432) | 0.046 | (0.022) | -0.024 | (0.030) | 23.19 | (36.60) |
| ANZ | -0.015 | (0.142) | 0.040 | (0.071) | -0.016 | (0.037) | 10.48 | (8.50) |
| EEU | -0.027 | (0.062) | 0.048 | (0.097) | -0.018 | (0.048) | 9.52 | (5.14) |
| FSU | -0.018 | (0.066) | 0.042 | (0.075) | -0.016 | (0.039) | 6.71 | (5.48) |
| MDE | -0.022 | (0.032) | 0.042 | (0.071) | -0.017 | (0.037) | 9.43 | (2.66) |
| CAM | -0.034 | (0.061) | 0.064 | (0.043) | -0.030 | (0.043) | 16.41 | (5.38) |
| SAM | -0.009 | (0.060) | 0.003 | (0.005) | -0.004 | (0.003) | 5.96 | (5.04) |
| SAS | -0.014 | (0.021) | 0.025 | (0.024) | -0.011 | (0.018) | 5.80 | (1.64) |
| SEA | -0.009 | (0.482) | 0.014 | (0.004) | -0.010 | (0.008) | 8.45 | (41.81) |
| CHI | -0.013 | (0.075) | 0.043 | (0.076) | -0.017 | (0.040) | 19.21 | (6.13) |
| NAF | -0.016 | (0.023) | 0.033 | (0.043) | -0.014 | (0.027) | 7.27 | (1.90) |
| SSA | -0.011 | (0.026) | 0.024 | (0.034) | -0.010 | (0.020) | 5.05 | (2.20) |
| SIS | -0.050 | (0.103) | 0.043 | (0.077) | -0.017 | (0.040) | 23.77 | (8.64) |

Standard deviations are given in brackets.

Although approximately four times too small, the impact of the fertilization effect on the SCC calculation in the FUND model is large.

According to Waldhoff et al. (2011), if the CO₂ fertilization effect is turned off in the FUND model (v3.5) the SCC increases by 75% from \$8/tonCO₂ to \$14/tonCO₂ (in 1995 dollars). In another study, Ackerman and Munitz (2012) find the effective increase in the FUND model to be

even larger, with CO₂ fertilization producing a positive externality of nearly \$15/tonCO₂ (in 2007 dollars).

Clearly, had the Idso (2013) estimate of the CO₂ fertilization impact been used instead of the one used in FUND, the resulting positive externality would have been much larger, and the resulting net SCC been much lower.

This is just for one of the three IAMs used by the IWG. Had the more comprehensive CO₂ fertilization impacts identified by Idso (2013) been incorporated in all the IAMs, the three-model average SCC used by the IWG would be been greatly lowered, and likely even become negative in some IAM/discount rate combinations.

E. The Misleading Disconnect Between Climate Change and the Social Cost of Carbon in the Integrated Assessment Models

It is generally acknowledged, the results from IAMs are highly sensitive not only to the model input parameters but also to how the models have been developed and what processes they try to include. One prominent economist, Robert Pindyck of M.I.T. recently wrote (Pindyck, 2013) that the sensitivity of the IAMs to these factors renders them useless in a policymaking environment:

Given all of the effort that has gone into developing and using IAMs, have they helped us resolve the wide disagreement over the size of the SCC? Is the U.S. government estimate of \$21 per ton (or the updated estimate of \$33 per ton) a reliable or otherwise useful number? What have these IAMs (and related models) told us? I will argue that the answer is very little. As I discuss below, the models are so deeply flawed as to be close to useless as tools for policy analysis. Worse yet, precision that is simply illusory, and can be highly misleading.

...[A]n IAM-based analysis suggests a level of knowledge and precision that is nonexistent, and allows the modeler to obtain almost any desired result because key inputs can be chosen arbitrarily.

Nevertheless, the EPA incorporates the IWG2013 determinations of the SCC into this proposed regulation—ill-advisedly so in our opinion.

Consider the following: the social cost of carbon should reflect the relative impact on future society that human-induced climate change from greenhouse gas emissions would impose. In this way, we (policymakers and regular citizens) can decide how much (if at all) we are willing to pay currently to reduce the costs to future society. It would seem logical that we would probably be more willing to sacrifice more now if we knew that future society would be impoverished and suffer from extreme climate change than we would be willing to sacrifice if we knew that future society would be very well off and be subject to more moderate climate change. We would expect that the value of the social cost of carbon would reflect the difference between these two hypothetical future worlds—the SCC should be far greater in an impoverished future facing a high degree of climate change than an affluent future with less climate change.

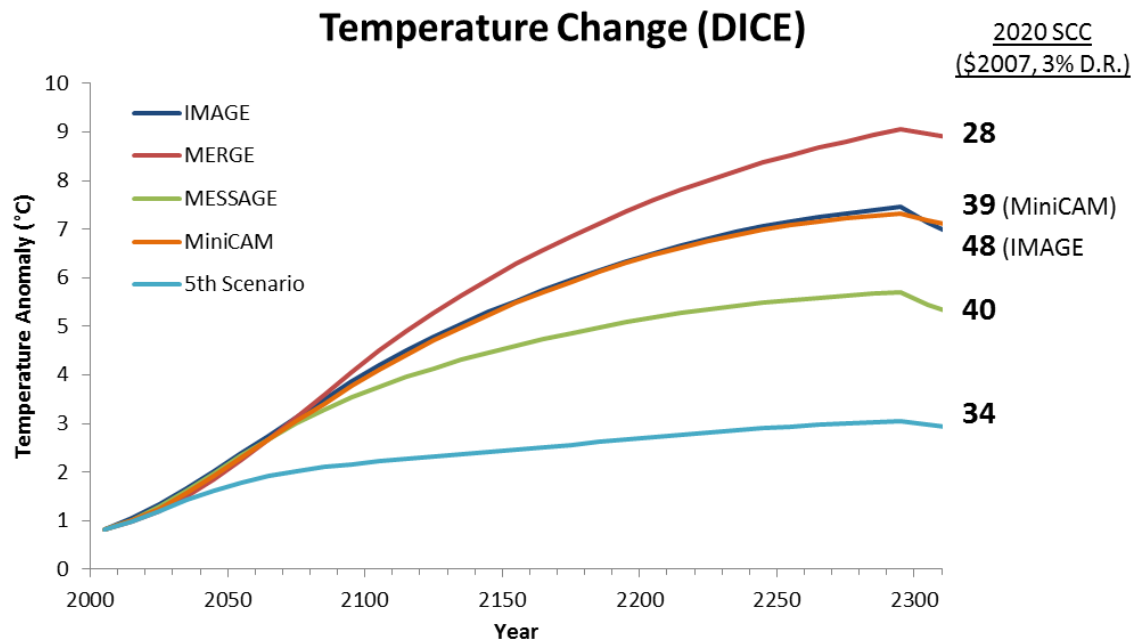
But if you thought this, you would be logically correct, but wrong.

Instead, the IAMs as run by the IWG2013 produce nearly the opposite result—the SCC is far *lower* in the less affluent/high climate change future than it is in the more affluent/low climate change future. Such a result is not only counterintuitive but misleading.

We illustrate this illogical and impractical result using the DICE 2010 model (hereafter just DICE) used by the IWG2013 (although the PAGE and the FUND models generally show the same behavior). The DICE model was installed and run at the Heritage Foundation by Kevin Dayaratna and David Kreutzer using the same model set up and emissions scenarios as prescribed by the IWG2013. The projections of future temperature change (and sea level rise, used later in the Comment) were provided to us by the Heritage Foundation.

The figure below shows the projections of the future change in the earth's average surface temperature for the years 2000-2300 produced by DICE from the five emissions scenarios employed by the IWG2013. The numerical values on the right-hand side of the illustration are the values for the social cost of carbon associated with the temperature change resulting from each emissions scenario (the SCC is reported for the year 2020 using constant \$2007 and assuming a 3% discount rate—numbers taken directly from Table A3 of the IWG2013 report).

The temperature change can be considered a good proxy for the magnitude of the overall climate change impacts.

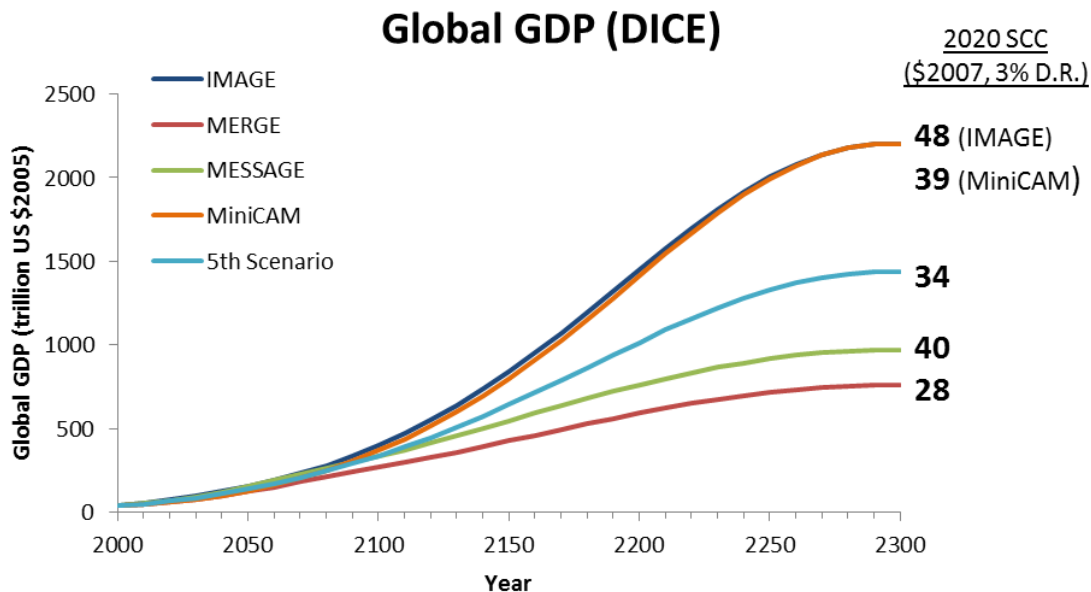


CAPTION: Future temperature changes, for the years 2000-2300, projected by the DICE model for each of the five emissions scenarios used by the IWG2013. The temperature changes are the arithmetic average of the 10,000 Monte Carlo runs from each scenario. The 2020 value of the SCC (in \$2007) produced by the DICE model (assuming a 3% discount rate) is included on the right-hand side of the figure. (DICE data provided by Kevin Dayaratna and David Kreutzer of the Heritage Foundation).

Notice in the figure above that the value for the SCC shows little (if any) correspondence to the magnitude of climate change. The MERGE scenario produces the greatest climate change and yet has the smallest SCC associated with it. The “5th Scenario” is a scenario that attempts to keep the effective concentration of atmospheric carbon dioxide at 550 ppm (far lower than the other scenarios) has a SCC that is more than 20% *greater* than the MERGE scenario. The global temperature change by the year 2300 in the MERGE scenario is 9°C while in the “5th Scenario” it is only 3°C. The highest SCC is from the IMAGE scenario—a scenario with a mid-range climate change. All of this makes absolutely no logical sense—and confuses the user.

If the SCC bears little correspondence to the magnitude of future human-caused climate change, then what does it represent?

The figure below provides some insight.



CAPTION: Future global gross domestic product, for the years 2000-2300 for each of the five emissions scenarios used by the IWG2013. The 2020 value of the SCC (in \$2007) produced by the DICE model (assuming a 3% discount rate) is included on the right-hand side of the figure.

When comparing the future GDP to the SCC, we see, generally, that the scenarios with the higher future GDP (most affluent future society) have the higher SCC values, while the futures with lower GDP (less affluent society) have, generally, lower SCC values.

Combining the results from the two figures above thus illustrates the absurdities in the IWG's use of the DICE model. The scenario with the richest future society and a modest amount of climate change (IMAGE) has the highest value of the SCC associated with it, while the scenario with the poorest future society and the greatest degree of climate change (MERGE) has the lowest value of the SCC. A logical, thinking person would assume the opposite.

While we only directly analyzed output data from the DICE model, by comparing Tables 2 and Tables 3 from the IWG2010 report, it can be ascertained that the FUND and the PAGE models behave in a similar fashion.

This counterintuitive result occurs because the damage functions in the IAMs produce output in terms of a percentage decline in the GDP—which is then translated into a dollar amount (which is divided by the total carbon emissions) to produce the SCC. Thus, even a small climate change-induced percentage decline in a high GDP future yields greater dollar damages (i.e., higher SCC) than a much greater climate change-induced GDP percentage decline in a low GDP future.

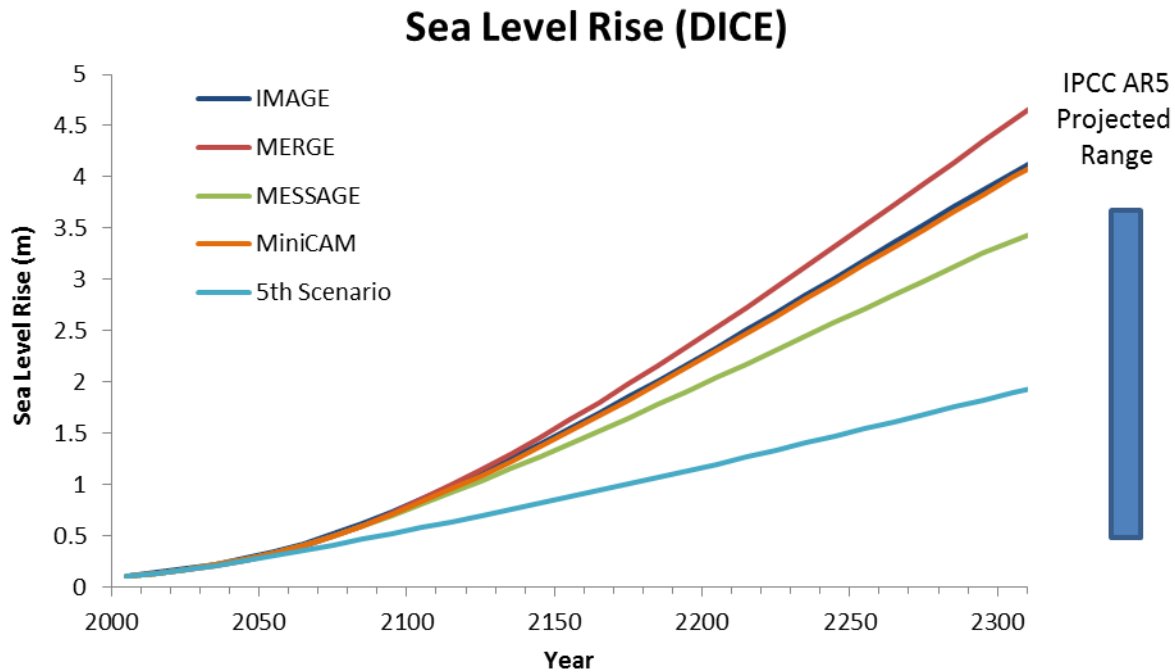
Who in their right mind would want to spend (sacrifice) more today to help our rich descendants deal with a lesser degree of climate change than would want to spend (sacrifice) today to help our relatively less-well-off descendants deal with a greater degree of climate change? No one. Yet that is what the SCC would lead you to believe and that is what the SCC implies when it is incorporated into the EPA's cost/benefit analyses.

In principle, the way to handle this situation is by allowing the discount rate to change over time. In other words, the richer we think people will be in the future (say the year 2100), the higher the discount rate we should apply to damages (measured in 2100 dollars) they suffer from climate change, in order to decide how much we should be prepared to sacrifice today on their behalf.

Until (if ever) the current situation is properly rectified, the IWG's determination of the SCC is not fit for use in the federal regulatory process, such as this EPA regulation, as it is deceitful and misleading.

F. Sea Level Rise

The sea level rise module in the DICE model used by the IWG2013 produces future sea level rise values that far exceed mainstream projections and are unsupported by the best available science. The sea level rise projections from more than half of the scenarios (IMAGE, MERGE, MiniCAM) exceed even the highest end of the projected sea level rise by the year 2300 as reported in the *Fifth Assessment Report* (AR5) of the Intergovernmental Panel on Climate Change (see figure).



CAPTION: Projections of sea level rise from the DICE model (the arithmetic average of the 10,000 Monte Carlo runs from each scenario) for the five scenarios examined by the IWG2013 compared with the range of sea level rise projections for the year 2300 given in the IPCC AR5 (see AR5 Table 13.8). (DICE data provided by Kevin Dayaratna and David Kreutzer of the Heritage Foundation).

How the sea level rise module in DICE was constructed is inaccurately characterized by the IWG2013 (and misleads the reader). The IWG2013 report describes the development of the DICE sea level rise scenario as:

“The parameters of the four components of the SLR module are calibrated to match consensus results from the IPCC’s Fourth Assessment Report (AR4).⁶”

However, in IWG2013 footnote “6” the methodology is described this way (Nordhaus, 2010):

“The methodology of the modeling is to use the estimates in the IPCC Fourth Assessment Report (AR4).”

“Using estimates” and “calibrating” are two completely different things. Calibration implies that the sea level rise estimates produced by the DICE sea level module behave similarly to the IPCC sea level rise projections and instills a sense of confidence in the casual reader that the DICE

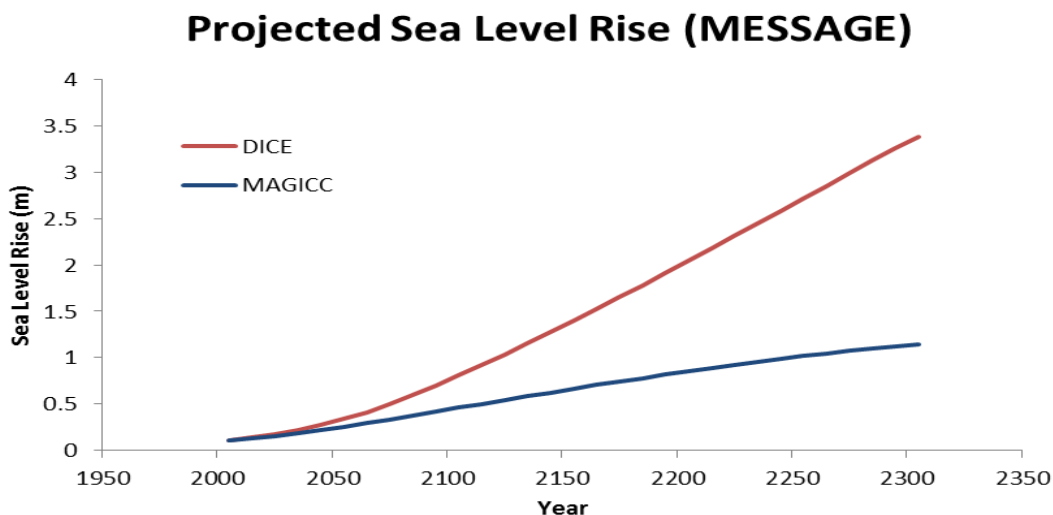
projections are in accordance with IPCC projections. However this is not the case. Consequently, the reader is misled.

In fact, the DICE estimates are much higher than the IPCC estimates. This is even recognized by the DICE developers. From the same reference as above:

“The RICE [DICE] model projection is in the middle of the pack of alternative specifications of the different Rahmstorf specifications. Table 1 shows the RICE, base Rahmstorf, and average Rahmstorf. *Note that in all cases, these are significantly above the IPCC projections in AR4.*” [emphasis added]

That the DICE sea level rise projections are far above the mainstream estimated can be further evidenced by comparing them with the results produced by the IWG-accepted MAGICC modelling tool (in part developed by the EPA and available from <http://www.cgd.ucar.edu/cas/wigley/magicc/>).

Using the MESSAGE scenario as an example, the sea level rise estimate produced by MAGICC for the year 2300 is 1.28 meters—a value that is less than 40% of the average value of 3.32 meters produced by the DICE model when running the same scenario (see figure below).



CAPTION: Projected sea level rise resulting from the MESSAGE scenario produced by DICE (red) and MAGICC (blue).

The justification given for the high sea level rise projections in the DICE model (Nordhaus, 2010) is that they well-match the results of a “semi-empirical” methodology employed by Rahmstorf (2007) and Vermeer and Rahmstorf (2009).

However, subsequent science has proven the “semi-empirical” approach to projecting future sea level rise to be unreliable. For example, Gregory et al. (2012) examined the assumption used in the “semi-empirical” methods and found them to be unsubstantiated. Gregory et al (2012) specifically refer to the results of Rahmstorf (2007) and Vermeer and Rahmstorf (2009):

The implication of our closure of the [global mean sea level rise, GMSLR] budget is that a relationship between global climate change and the rate of GMSLR is weak or absent in the past. The lack of a strong relationship is consistent with the evidence from the tide-gauge datasets, whose authors find acceleration of GMSLR during the 20th century to be either insignificant or small. It also calls into question the basis of the semi-empirical methods for projecting GMSLR, which depend on calibrating a relationship between global climate change or radiative forcing and the rate of GMSLR from observational data (Rahmstorf, 2007; Vermeer and Rahmstorf, 2009; Jevrejeva et al., 2010).

In light of these findings, the justification for the very high sea level rise projections (generally exceeding those of the IPCC AR5 and far greater than the IWG-accepted MAGICC results) produced by the DICE model is called into question and can no longer be substantiated.

Given the strong relationship between sea level rise and future damage built into the DICE model, there can be no doubt that the SCC estimates from the DICE model are higher than the best science would allow and consequently, should not be accepted as a reliable estimate of the social cost of carbon.

We did not investigate the sea level rise projections from the FUND or the PAGE model, but suggest that such an analysis must be carried out prior to extending any confidence in the values of the SCC resulting from those models—confidence that we demonstrate cannot be assigned to the DICE SCC determinations.

G. Summary

The social cost of carbon as determined by the Interagency Working Group in their May 2013 Technical Support Document (updated in November 2013) and included in the Regulatory Impact Analysis of this EPA action is unsupported by the scientific literature, not in accordance with OMB guidelines, fraught with uncertainty, and thus unsuitable and inappropriate for federal rulemaking. As such, use of the SCC in cost/benefit analyses in this and all proposed federal regulation should be suspended.

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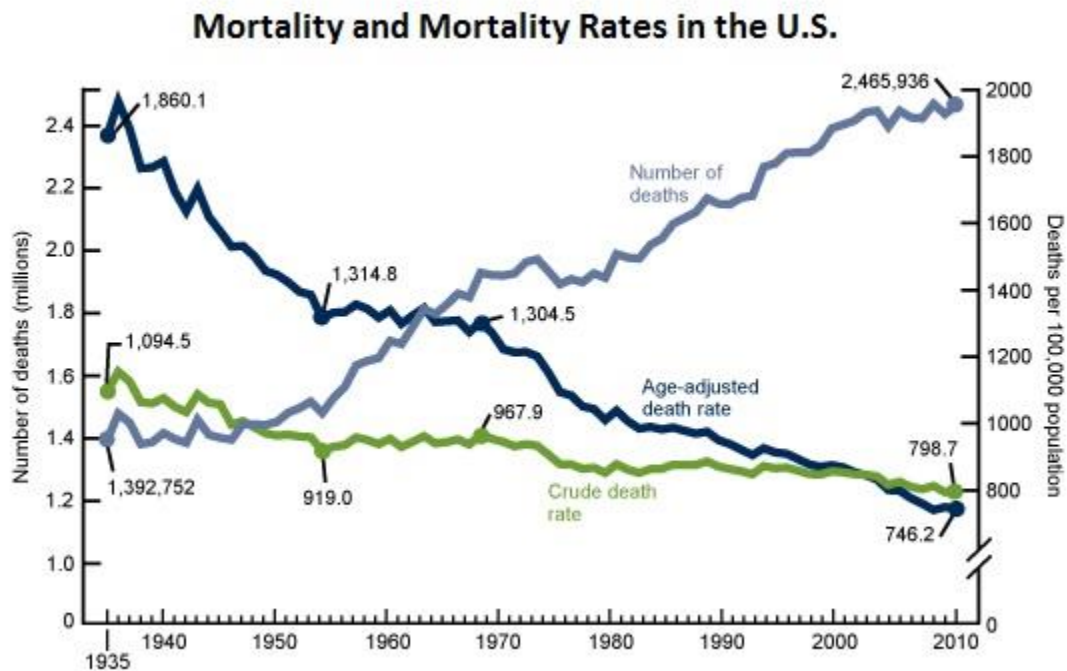
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III. Human Health Impacts of Climate Change

The EPA's RIA is mistaken in asserting that “this rule would result in net benefits from avoided negative health...effects.” In fact, the overall state of human health is improving as evidenced from a doubling of the average American's life span since 1900.

Consider the figure below from the Centers for Disease Control (CDC), showing several measures of mortality across the U.S. Even though the raw number of people dying each year is on the increase, this increase is a result of an increasing and aging population. Correct for these attributes (dark blue line) and you see that a large and on-going decline. If you want to go looking for an anthropogenic climate change signal, you need to go looking in this overall trend

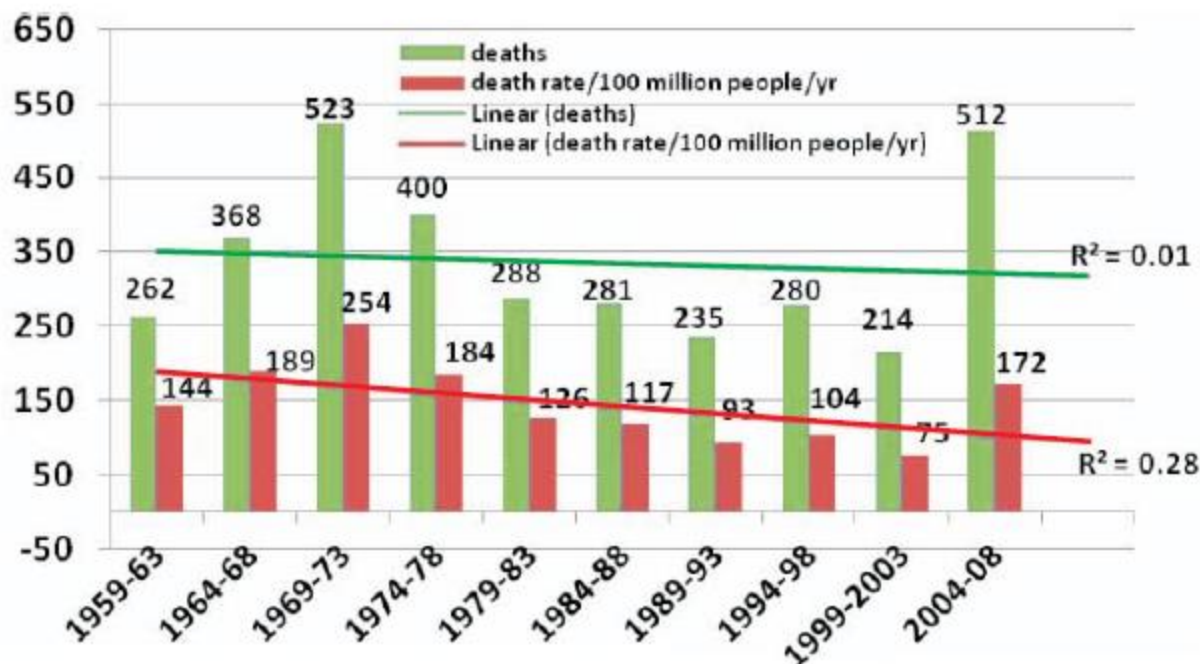
in declining death rates. You surely won't find that anthropogenic climate change slowed this decline. You might find that climate change hastened to it.



CAPTION: Number of deaths, crude and age-adjusted death rates: United States, 1935–2010 (source: CDC).

A. Extreme Weather Events

Overall mortality from extreme weather events (hurricanes, floods, lightening, tornados) shows a long-term decline in the United States when properly adjusted for population changes (Goklany, 2011). This leaves little room to implicate anthropogenic climate change as producing a negative health benefit from altering the character or occurrence of such events in the United States—an alteration which the best science does not provide reliable guidance as to its direction, much less the magnitude.



CAPTION: Cumulative annual U.S. deaths (green) and death rates (red) from hurricanes, floods, lightning and tornados, 1959-2006 (from Goklany, 2011).

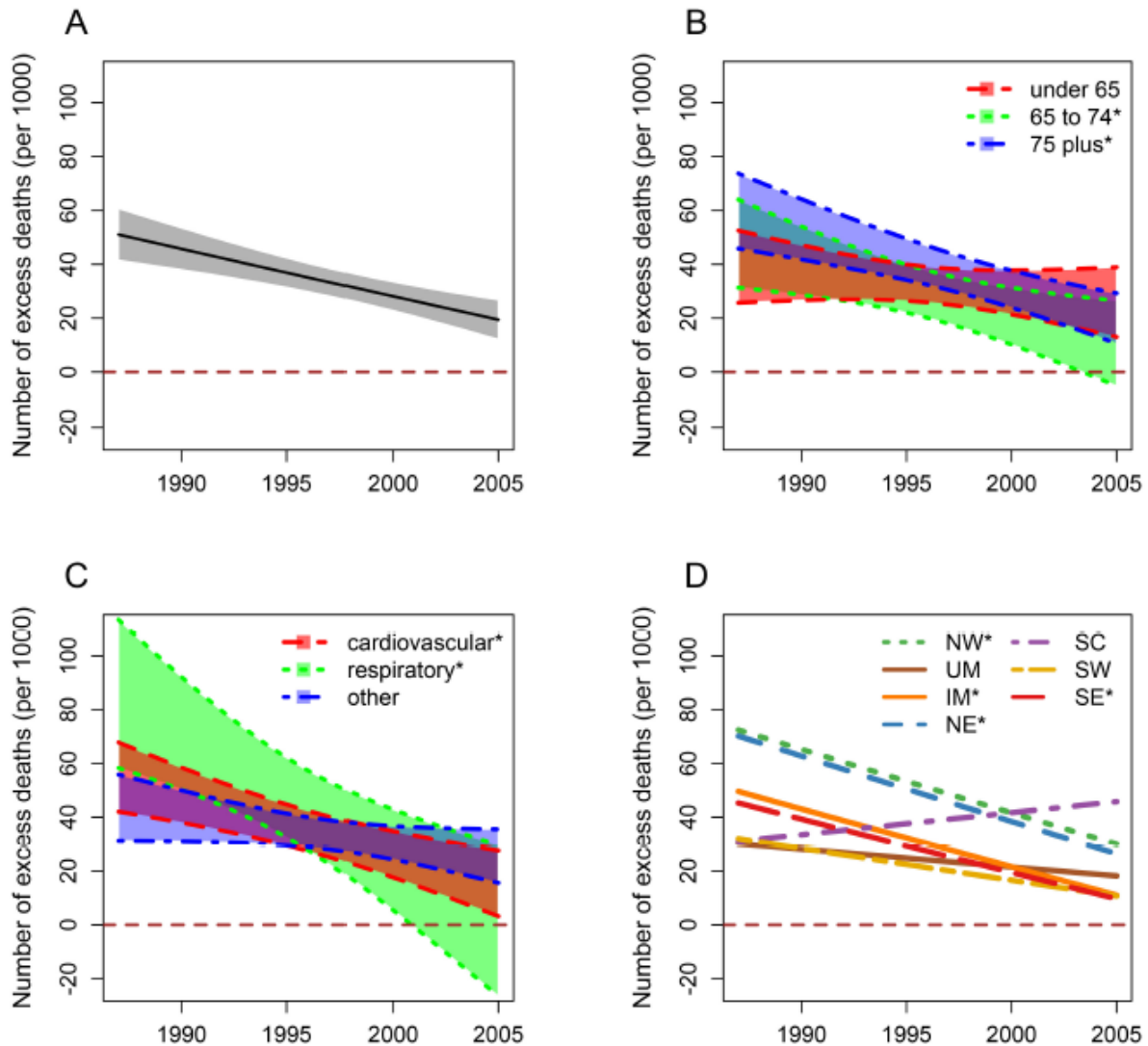
B. Heat-related Mortality

What is not included in the above figure is mortality from extreme heat events which are often billed as the leading cause of weather-related mortality in the U.S. This situation is readily rectified by a new study (Bobb et al., 2014) examining trends in heat-related mortality across the U.S. Bobb et al. (2014) using data from 1987 through 2005 conclude:

This study provides strong evidence that acute (e.g., same-day) heat-related mortality risk has declined over time in the US, even in more recent years. This evidence complements findings from US studies using earlier data from the 1960s through mid-1990s on community-specific mortality rates (Davis et al. 2003a; Davis et al. 2003b), as well as European studies that found temporal declines in heat-related mortality risk (Carson et al. 2006; Donaldson et al. 2003; Kysely and Plavcova 2011; Schifano et al. 2012), and supports the hypothesis that the population is continually adapting to heat.

These conclusions (see also figure below) confirm the long-standing finding of earlier work (e.g., Davis et al., 2003a; 2003b; Kalkstein et al. 2009) that the U.S. population's sensitivity to extreme

heat is declining—*despite a rise in temperature leading to an increased magnitude and frequency of heat events.*



CAPTION: Temporal trends, from 1987 to 2005, in the excess number of deaths (per 1000 deaths) attributable to each 10°F increase in the same day's summer temperature, nationally in the US, (A) on average across age groups, and stratified by (B) age group, (C) cause of death, and (D) geographical region. Asterisks in the legend denote statistically significant trends. NW = northwest, UM = upper midwest, IM = industrial midwest, NE = northeast, SC = southern California, SW = southwest, SE = southeast. (from Bobb et al., 2014).

The cause of this declining sensitivity in the face of rising heat is likely found in a collection of adaptations including increased access to air-conditioning, better medical care, community response programs, heat watch/warning systems, and biophysical changes. There is no reason to think that such response measures won't continue to exist and be improved upon into the future.

A study summarizing the recent findings on declining heat-related mortality trends in both the U.S and Europe made this observation (Knappenberger et al., 2014):

Some portion of this response [the declining sensitivity to excessive heat events] probably reflects the temporal increase in the frequency of extreme-heat events, an increase that elevates public consciousness and spurs adaptive response. In this manner, climate change itself leads to adaptation.

The bottom line implies that through the collective adaptive response, climate change not only does not result in negative human health outcomes, but may, in fact, spur positive ones.

These findings render the EPA's contention to the contrary to be shallow and misleading and unfit to justify this regulation.

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IV. The Environmental Impacts of the Rule will be Negligible and Scientifically Undetectable

The relative impact that greenhouse gas emissions from the U.S. have on the future course of the earth's climate is rapidly diminishing. Instead the climate course into the future is being set by the world largest and developing nations, including China and soon India. Such a fact makes reducing greenhouse gas emissions from the United States an inconsequential (at least environmentally) effort.

Globally, in 2011, humankind emitted 32,579 million metric tons of carbon dioxide (mmtCO₂: according to the latest numbers from the U.S. Energy Information Administration, EIA) from the consumption of energy. Energy-related CO₂ emissions from the U.S. in 2011 were 5,491 mmtCO₂, or 16.9% of the global total. During the prior 10 years, global energy-related emissions of CO₂ increased at an average rate of 786 mmtCO₂/yr.

This means that even a complete cessation of *all* energy-related CO₂ emissions from the United States will be completely subsumed by global emissions growth in just 7 years' time. In fact, China alone, over the past 10 years, emitted on average 539 mmtCO₂ of new emissions each year (over and above the total from the year before). This means that China's CO₂ emissions growth would completely replace a complete shutdown of all U.S. emissions in just over 10 years. As this EPA Rule would have minimal impacts on U.S. carbon dioxide emissions (by the EPA's own reckoning), the time until any emission reductions achieved under this Rule would be completely overwhelmed by global emissions year-over-year growth *is only a matter of days*. Clearly there are no environmental impacts to be gained in such a situation.

This point is further emphasized by a direct calculation of the global temperature savings achieved through this regulation assuming the best-case scenario in which all existing coal-fired power plants are replaced by power plants which meet the emissions caps proposed in this regulation. This would result, according to the EPA, in an approximately 40% reduction in carbon dioxide emissions over existing emission levels from coal-fired power plants. According to the EIA, in 2011, the consumption of coal in the U.S. released 1,874 mmtCO₂. A reduction of 40% would be equivalent to 750 mmtCO₂ savings per year which would reduce total U.S. CO₂

emissions by about 15%. Using EPA's Model for the Assessment of Greenhouse-gas Induced Climate Change (MAGICC) model run under the SRES A1B scenario and assuming the default climate sensitivity of 3.0°C, this results in a net global temperature "savings" (a reduction of the total MAGICC-projected global temperature rise) of 0.01°C by 2050 and 0.014°C by 2100.

Applying a equilibrium climate sensitivity of 2.0°C (which is in better accordance with the recent scientific literature, as described in Section II.C above), the best-case global temperature savings drops to 0.0075°C and 0.01°C by 2050 and 2100 respectively. And these numbers are too high because they assume that the 750 mmtCO₂/yr emissions saving begins immediately. In reality if it is ever achieved through this ruling, it will take place only after all existing coal-fired plants have been replaced, which will take decades, and push the temperature savings reported above further into the future.

In all cases, the temperature savings from this EPA Rule are so small as to completely undetectable and inconsequential to all local, regional, and global environmental systems.

As such, the rule serves no environmental purpose, now or in the future, and should be withdrawn.

V. Conclusions

The social cost of carbon as determined by the Interagency Working Group in their May 2013 Technical Support Document (updated in November 2013) and used by the EPA in this proposed Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units is unsupported by the scientific literature, not in accordance with OMB guidelines, fraught with uncertainty, illogical and thus completely unsuitable and inappropriate for federal rulemaking. As such, use of the SCC in cost/benefit analyses in this proposed rulemaking should be suspended.

Further, the bulk of the scientific research on the topic of trends in heat-related mortality indicates that in the face of a warming climate, the rate of heat-related mortality is declining—a result of a collection of adaptive measures, some likely spurred by the warming itself. As heat-related mortality marks one of the primary perceived public health threats from anthropogenic

climate change in the U.S., the fact that the scientific literature contradicts the EPA's assertions on this topic requires a reexamination of this justification for the proposed Rule.

And finally, the EPA admits that this Rule will have little if any impacts on U.S. carbon dioxide emissions, writing:

“[T]he EPA anticipates that the proposed EGU New Source GHG Standards will result in negligible CO₂ emission changes, energy impacts, quantified benefits, costs, and economic impacts by 2022.”

We show, that even assuming best case emission reductions occurring beyond 2022, that the climate impacts of this proposed Rule will be scientifically undetectable and environmentally inconsequential.

In light of these critical issues, we recommend that the EPA's proposed Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units be withdrawn.