

Now that the Environmental Protection Agency has announced its proposed rules for restricting greenhouse gas emissions from existing power plants, the climate focus of EPA and the states will first be on polishing the rules for final approval, then on the anticipated law suits, and then on the development of state plans to meet the reduction targets. If only that was all we needed to do. While the proposed rules represent a dramatic shift in the federal government's approach to change mitigation, the fate of the vast majority of current and future greenhouse emissions is still very much up in the air.

Consider the math. Power generation is about 40% of overall greenhouse gas emissions. The EPA aims to cut those emissions by 30%. That would mean a 12% reduction from today's levels, except for the fact that the proposed rules don't rely on the current levels – they look back to emissions in 2005 — before the recession suppressed the demand for electricity, before lower natural gas prices led to reduced reliance on coal, and before renewable energy and energy efficiency programs reached their stride. Power plant emissions are already significantly lower today than they were in 2005, so while the overall reductions to be achieved from the new program are important, they are significantly less than 12% of the problem. Since the commonly understood objective is to reduce all emissions to a place that is 80% below the lower levels experienced in 1990, there is still a very long way to go.

In his last two State of the Union addresses, President Obama declared that in the absence of federal legislation, he would do what he could under existing law to reduce greenhouse gas emission. A year ago, he issued his Climate Action Plan, setting forth steps to be taken by various federal agencies and departments. EPA's latest action is part of that plan. Working with members of Congress, we at UC Berkeley's Energy and Climate Institute and Berkeley Law's Center for Law, Energy and the Environment have been looking into additional actions federal agencies could take under existing law to reduce greenhouse gas emissions.

We have now released the first of a series of reports stemming from that work – this one involves the U.S. Department of the Interior. You can find the report [here](#). The driving force in working with me on this report was Romany Webb, a 2013 graduate of Berkeley Law. Here are some of the additional ways that Interior could address the problem, without further action by Congress:

- limiting greenhouse gas emissions from oil and gas wells, pipelines, and other facilities;
- enhancing carbon storage by improving the agency's land management and allowing private parties to undertake sequestration on federal lands;

- supporting additional renewable power production by reducing the rents and other fees producers must pay to use public lands;
- working with other federal agencies to streamline the permitting process for transmission projects;
- allowing private or public construction of new hydroelectric power plants on existing federal dams and other waterway structures; and
- restricting activities that emit greenhouse gases to avoid adverse impacts on threatened and endangered species.

To achieve dramatic reductions in greenhouse gas emissions, we need an “all of the above” strategy. We would encourage Interior to look further at each of the options in our report, identify their potential impact on the problem, and modify the Department’s efforts, where appropriate.

Look for the release of more reports in the coming weeks. On deck are reports focusing on the Department of Agriculture and the Federal Energy Regulatory Commission.