



**Proposed Rulemaking – CO<sub>2</sub> Budget Trading Program**  
**State Representative Donna Bullock**  
**195<sup>th</sup> Legislative District**  
**Public Comment, December 8, 2020**  
**Commenting as an Individual**

Good afternoon. I am State Representative Donna Bullock, and I represent the 195<sup>th</sup> Legislative District of Pennsylvania which includes parts of north and west Philadelphia. I am also the current chair of the Pennsylvania Legislative Black Caucus and Secretary of the Joint Legislative Air, Water and Pollution and Conservation Committee. More importantly, I am a member and supporter of Moms Clean Air Force and a resident of Pennsylvania and a mother of 2 children.

As a legislator in the Pennsylvania House of Representatives, I have become a voice for black and brown communities on environmental justice issues. These are often frontline communities, with high air pollution, and high asthma rates, and these same communities are also often last to benefit from climate change efforts, such as clean, renewal and efficient energy sources such as wind and solar.

RGGI is a bi-partisan, multi-state, market-based cap and trade program that aims to reduce carbon dioxide (CO<sub>2</sub>) emissions and other air pollutants from power plants. By participating in RGGI, Pennsylvania can incentivize power companies to do better, to reduce their pollution, and to hopefully invest in cleaner and zero-carbon energy over time.

RGGI has proven state after state to be successful in reducing power sector driven air pollution, reducing asthma attacks and respiratory-related hospital visits, and also reducing premature deaths from respiratory illnesses.

While RGGI's cap-and-trade program has shown to reduce greenhouse gas emissions and other harmful pollutants, it has not guaranteed reductions in communities of color, low-income communities and other frontline communities. These environmental justice communities have historically been disproportionately affected by the siting of polluting facilities and systemic racism has limited the mobility of communities of color, as well as their influence over where the facilities being placed near their homes, schools, places of worship, and where they work. Systemic racism also limits the influence these communities will have over an inherently, structurally biased market-based, market-driven program. A study conducted by the Food and Water Watch found that RGGI can compound the already disproportionate burden of these communities.

While I support RGGI and its goals, I fear that if RGGI is not aligned with an environmental justice strategy, the market forces built into the cap and trade program may continue to drive these inequities. However, if we build safeguards into the legislation now, all communities can benefit from an equitable reduction in greenhouse gas emissions, we can decrease the burden of frontline communities and significantly improve the conditions of black and brown, and low-income communities.

Impacted communities, environmental justice leaders, and the general public should be frequently consulted. They should be invited to provide input to the design, implementation, and continuation of our state's participation in RGGI.

DEP should collect and make publicly available data that identifies how RGGI impacts environmental justice communities. This data should show specifically the distribution of greenhouse gas emissions reductions throughout the Commonwealth, where are the reductions happening and where are power plants taking advantage of allowances to continue to emit pollutants.

Lastly, significant portion of the estimated \$300-500 million annual proceeds should be allocated to programs and initiatives to assist environmental justice communities. A fund can be created from the proceeds to address air pollution in these communities, any other inequities that arise as a result of our participation in RGGI, as well as longstanding systemic environmental racism and injustices. The establishment and distribution of this fund should be informed by environmental justice leaders and communities.

In conclusion, RGGI is proven to work. It makes sense economically and environmentally. Many will testify about that today. It will reduce air pollution and have a significant impact on climate change. It will create jobs, and we should all be supportive of that. However, we should also take this opportunity to address systemic, structural environmental racism. We have an opportunity here to improve the lives and health of black and brown Pennsylvanians who live in frontline communities, and to not continue inherently unfair and racist policies and systems that keep black and brown residents locked-in to environmentally harmful areas and locked-out of the rewards of good policy- cleaner, affordable energy, cleaner air and cleaner jobs. We have an opportunity to ensure that all communities can equitably benefit from the gains made by our state's participation in RGGI.