



Stephen Hoffman

From: ecomment@pa.gov
Sent: Monday, January 4, 2021 5:14 PM
To: Environment-Committee@pasenate.com; IRRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com; siversen@pahouse.net
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 8 (1pm) - #7-559
Testimony date: 12/11/2020 12:00:00 AM
Testimony location: WebEx

Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: CO2 Budget Trading Program (#7-559).

Commenter Information:

Arundhati Khanwalkar
 (tinkuvolk@me.com)
 208 North Marshall Street
 Allentown, PA US

Comments entered:

Hello, my name is Arundhati Khanwalkar. I am an environmental attorney located in Allentown, Pennsylvania. I am testifying in my individual capacity in support of the DEP's proposed RGGI regulation.

In 2019 I retired from a large power company where I worked for about 30 years in various capacities, including as a lawyer, and as head of the environmental department. While there, I was deeply involved in the company's market-based clean air strategies, including under the Acid Rain Program, the Clean Air Interstate Rule and the Cross State Air Pollution Rule. I am currently chair of the Allentown Environmental Advisory Council and am a member, or on the board, of several community organizations, industry groups, and environmental organizations in Pennsylvania, including the board of PennFuture.

Climate change is one of the most significant crises and one of the greatest challenges we have

ever faced. Avoiding some of the worst projected impacts will require unprecedented levels of action across the globe.

In recognition of the severity of climate change impacts that we are already experiencing across the globe (ranging from drought, to flooding, water quality impacts and health impacts), the demand and need for bold, strong action has grown increasingly urgent, including here in Pennsylvania.

The growing demand for state action is fueled not only by the observable environmental impacts of climate change, but also the human impacts, including impacts to critical infrastructure and to human health. And as is so often the case, the adverse impacts disproportionately afflict lower income populations. It is this element — the disproportionate impact of climate change on the low-income, that is especially troubling.

In the past few years, we have become painfully aware of the crying need to address the enormous inequities placed upon certain groups of people in this country, especially those of low income. Books can be written on the numerous actions that need to be taken — here in Pennsylvania and across the nation — to demonstrate that these people matter to our society. But clearly, one of those actions is a commitment to do our share to mitigate greenhouse gas emissions.

In some cases, the appropriate mitigation actions to take are debatable, especially where those actions could impose additional costs and burdens on the very people we seek to protect. However, in the case of the DEP's proposed RGGI regulations, we are presented with a win-win that already has been demonstrated to work in other states that have implemented the RGGI program for many years.

Properly structured, RGGI could create jobs and grow Pennsylvania's economy while reducing energy bills and significantly improving the quality of life — particularly for low-income populations. In the city of Allentown, for example, there are thousands of low-income tenants living in apartments where the landlord has no incentive to improve the energy efficiency of the building because the high energy bills are borne by the tenant. If Pennsylvania can implement RGGI in the way that Maryland has done, for example, state grants could be provided to incentivize the landlord to upgrade the energy efficiency of the building, reducing the City's carbon footprint and making the energy bills more affordable for the tenant. The landlord wins, the tenant wins, the City wins and the state wins — even before taking into account any environmental and health benefits from reducing climate impacts.

In light of these benefits which have been demonstrated in other RGGI states, it would be unconscionable for Pennsylvania to fail to proceed with the proposed RGGI regulations.

Thank you for your work on this and thank you for this opportunity to comment.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov