



## Stephen Hoffman

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**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 10 (6pm) - #7-559  
**Testimony date:** 12/14/2020 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:

Susan Loucks  
 (susanloucks@gmail.com)  
 922 Jancey Street  
 Pittsburgh, PA 15206 US

Comments entered:

I'm Susan Loucks and I live in Pittsburgh, PA - an area deeply impacted, historically and currently, by pollution from fossil fuels - this city has received an F from the American Lung Association for the last two years.

I've lived here for six years, but I lived in Massachusetts from 2000 until the end of 2012. I have a master's in Natural Resources and for many of those 12 years I was working in the environmental field, including in a nonprofit that worked on market transformation with utility companies across the region. During that same time, of course, the RGGI program was ramping up and beginning implementation. RGGI was definitely something that was being talked about in my circles and the lessons we have from states with experience give me high hopes for the effects it might have in Pennsylvania.

There are benefits I think would be particularly good for PA that have happened in other states:

- To decouple the conversations on economy and pollution - this shifting of the conversation is particularly important for PA where the question around everything related to fossil fuels is largely framed as business as usual, extraction and consumption and jobs, or less pollution and economic atrophy.
- Many states are using RGGI as a foundation for carbon emission reductions goals - such as Massachusetts' Global Warming Solutions Act of 2008. The targets it set would be extraordinarily difficult to achieve without RGGI, and yet by participating in the program they can show that they're succeeding and even more is possible. As of 2018, Pennsylvania has climate goals as well:
  - 26 percent reduction in GHG emissions by 2025, and 80 percent reduction in GHG emissions by 2050.
  - Clearly, RGGI can be a tool to allow us to expand our vision.
- This is true for all participating states, but regional effects are driven by the compact as opposed to motivated by Federal legislation, which has priorities that have shifted broadly over the course of RGGI's existence

There are benefits to the general public in public health e.g reductions in nitrous oxide, Sulfur dioxide, particulates and mercury levels, and the huge cost savings due to reduced incidents of cancer, asthma, and other diseases related to this pollution. We know that air pollution creates more danger of COVID complications, and we're in line for that here. These have been named in the introduction and by other presenters.

Finally, consumers have also benefited on a monthly basis as overall, consumer electrical costs have decreased.

The map shows that our neighbors are joining. NJ, which dropped out, has reconsidered and is coming back in. Virginia is coming on board. Right now there's a big rectangular gap in the RGGI coverage map. We need to fill it and work with our neighboring regions in achieving these same kinds of successes.

I support recommendations to PA's RGGI entrance including monitoring air pollution in environmental justice communities, working with community leadership where problems don't trend better, and prioritizing RGGI investment in those communities. In summary, I'm all in for PA joining RGGI.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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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](mailto:ecomment@pa.gov)