



Stephen Hoffman

From: ecomment@pa.gov
Sent: Wednesday, January 6, 2021 8:56 PM
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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:

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Comments entered:

I have been a Pennsylvania resident for 29 years. I am also a Professor of English Literature and Environmental Studies at Swarthmore College, and I have represented this country as a Fulbright Scholar to both Morocco and Bhutan, which has proclaimed itself the world's first carbon neutral nation.

As a former chair of the Environmental Studies program, I have both organized and participated in delegations of Swarthmore students and faculty to the annual global climate meeting, the Conference of the Parties held by the United Nations Framework Convention on Climate Change (UNFCCC). As I am sure you know, the Intergovernmental Panel on Climate Change or the IPCC has called for the world to reduce its carbon emissions by nearly 50% before 2030 and to reach 0 emissions by 2050. These are daunting yet critical goals.

My students sometimes express deep frustration and anger at the lack of global progress on

mitigating—reducing—climate change and its many harms. They point out that the UNFCCC has been around longer than they have been alive, and yet our global emissions continue to climb.

Now Pennsylvania legislators have a chance to begin turning the tide. Cap-and-trade programs such as RGGI have been effective in reducing both carbon emissions and the costs of those emissions reductions over time. Global efforts to slow climate change rely heavily on expanding such programs. RGGI's emissions reports demonstrate a drop in carbon emissions from 133 million tons across its participating states in 2008 to less than 60 million tons in 2019.[1] This is impressive progress.

Some people argue that these reductions have been achieved by larger public policies and cannot be attributed to RGGI. But a 2015 Duke study attributed roughly half of the carbon reductions in participating states to RGGI: a very significant portion.[2] Another point of dispute has been the idea that emissions reductions in Pennsylvania might be meaningless because of emissions associated with electricity imported from non-participating states. But even taking electricity imports into account, electricity-related emissions in RGGI-participating states fell from 173 million tons to 108 million tons between 2008 and 2017.[3] And of course, the way to reduce such emissions "leakage" is to expand the number of states included in programs like RGGI. Despite climate denial and disinformation attempts to block Pennsylvania's entry into RGGI, the evidence shows that RGGI is working as it should to reduce carbon emissions.[4]

Multiple studies have shown that RGGI has improved air quality and public health in participating states; those of us who live in southeastern Pennsylvania have already benefitted indirectly from RGGI.[5] And we need those benefits! Residents of Chester City, 5 minutes down the road, experience far worse health outcomes than Pennsylvania residents living with cleaner air. Chronic exposure to particulate matter has been shown to be a "contributable variable to COVID-19 mortality." [6] Environmental justice demands that the Commonwealth work to improve air quality across the state for the benefit of all of its residents.

I too long for my family to breathe cleaner air. My daughter suffered with childhood asthma. In 2013, she was hospitalized with asthma-aggravated pneumonia. No parent should have to watch their child's oxygen levels drop precipitously or find themselves racing for a hospital and a nebulizer mask. We can do better. We must do better.

As you know, the DEP's analysis of public health benefits from joining RGGI projects that reductions in NO_x (nitrogen oxides) and SO_x (sulfur dioxides) would prevent hundreds of premature deaths in Pennsylvania, along with not just thousands but tens of thousands fewer asthma attacks like my daughter's. Along with fewer lost workdays, we could see public health benefits somewhere between 3 and 6 billion dollars. These are significant savings, especially given the budgetary struggles we face as a Commonwealth.

Again, according to the DEP's modeling—this time, its economic modeling—if Pennsylvania's proceeds from RGGI allowance auctions were invested equally among energy efficiency, renewable energy, and greenhouse gas abatement, we would see a net increase of 30,000 job-years and a \$1.9 billion increase in gross state product. Maybe we would choose to invest more heavily in one area than another—but the overall point here is that joining RGGI can help us to make a crucial transition to a greener economy. Adding jobs and gross state product

In addition to joining RGGI, Pennsylvania should focus on increasing renewable energy sources and increasing energy efficiency (which more than pays for itself). The Commonwealth should also work to create a just transition for workers in coal, oil, and gas by passing Senate Bill 15 or House Bill 2856, the "Energy Transition and Recovery Act."

I would like to underscore environmental justice comments and suggestions raised by speakers such as Eileen Flanagan, Will Bernstein, Grant Ervin, the previous speaker and others today.

We have very little time left in which to maneuver. Already, earth systems are shifting into their own intensifying feedback loops which will make this planet far less habitable for human kind. Joining RGGI helps the Commonwealth in the short term and our entire species in the longer term.

Thank you for considering this testimony.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
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