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Cc: c-jflanaga@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:

Lucyna de Barbaro
 Rebuilding Together Pittsburgh (ldbarbaro@rtpittsburgh.org)
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Comments entered:

Good afternoon. My name is Lucyna de Barbaro, and I am a program manager at Rebuilding Together Pittsburgh, or RTP, in short. My testimony today is on behalf of RTP. We are a Pittsburgh-area nonprofit working to preserve affordable homeownership and revitalize neighborhoods. We provide critical home repairs, and health and efficiency upgrades to those in need, at no cost to them. RTP budget comes from federal and state programs, grants from foundations, and donations from corporations and individuals, and in 2019 we have made 137 homes healthier and safer, for 207 residents, spending \$3.1M. Our work exposes us to see deeply into the state of housing in the region as well as the state of health and locality-related problems and concerns experienced by our clients. In addition to direct house improvement intervention, we also gather and present information about such problems for use by policy makers and in advocacy. Healthy housing is our main area of expertise. We have recently completed work on assessing the state of lead, radon, and moisture in Allegheny County homes. Since people spend most of our time in buildings, the health of the

building impacts the health of inhabitants. But unlike in other states or counties, outdoor air is not helping to alleviate the negative health effects that exist in homes, but instead exacerbates and compounds the health risks for our population. In partnership with Reducing Outdoor Contaminants in Indoor Spaces project we engaged in monitoring outdoor pollutants in the homes of our elderly low income and at-risk clients, using particulate matter detectors capturing particles as fine as 0.3 microns. The study uses indoor and outdoor units at each client's home, and the data is unequivocal: outdoor pollution enters the homes and substantially increases particulate matter count indoors. We also have another measure to evaluate indoor risk pollution from outdoor contaminants, namely, the measurements of air leakage between the outdoors and indoors in homes. This data is obtained as part of our Building Performance Institute-prescribed energy audits; an average infiltration rate is measured to be 5136 cubic feet of air per minute at the pressure of 50 Pascals, based on 256 homes, to be contrasted with the national average of 2514 cfm@50. To express it in another way, even at natural atmospheric pressure, when temperature difference exists between outdoors and indoors, or due to wind factor, the whole volume of air inside the home is exchanged with outdoors within 1.1 hours, on average. Why is it relevant for this testimony? The Clean Air Act mandates PA DEP and the Environmental Quality Board to improve or maintain good air quality in our region. Efforts to do so, either through the Allegheny County Health Department or other regulation have not resulted in improvements in the last couple of decades. Allegheny County continues to be listed as one of the few worst in the nation for air quality, and the number of warnings for "code yellow", orange or even red air quality index exceeds most other places. Seniors and vulnerable populations are advised not to go outdoors on these days. But as I have illustrated for this hearing, outdoor air and outdoor contaminants freely enter the indoor spaces where they negatively impact the health of our population. It is especially so for the lower-income and disadvantaged population, who not only live in poorer performing housing but are additionally more likely to be collocated with power plants and big industry plants. The warning to stay indoors when the air pollution is high in our region is meaningless at times when temperature difference or wind bring the very same conditions into the homes of people in our region. Our region's homes were built around 1930, compared to the national average of 1963, and have exceptionally poor energy efficiency levels, in addition to this extreme leakiness. From our energy audits, we found that the energy needed to heat, cool and operate homes exceeds the average for Northeast by 37% for middle class families (when compared to available data from Energy Information Agency) and is 95% worse than Northeast average for lower-income families. High energy use in our homes results also in much higher associated CO2 emissions from buildings in PA. By joining RGGI, which my organization strongly supports, PA would not only impact the stagnant air quality issues in our region by more strongly regulating pollution from power plants, but also generate revenue to reinvest into much needed improvements for PA homes, and substantially improve health, comfort, and well-being for the residents of our state now and for the future. Mandates for such energy efficiency improvements are also known to generate well-paying jobs. RTP commends the Wolf administration for taking this significant step and we ask that you move forward with this regulation.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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