



Pennsylvania State Building and Construction Trades Council

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Environmental Quality Board
 16th Floor Rachel Carson State Office Building
 400 Market Street
 P.O. Box 8477
 Harrisburg, PA 17105-8477

**Re: Proposed Rulemaking #7-559 - CO2 Budget Trading Program
 Please Reject Pennsylvania's participation in RGGI.**

Dear members of the Environmental Quality Board:

On behalf of our 94 Local Unions and 15 Regional Councils, which collectively represent over 100 thousand construction workers and their families (TAXPAYERS) throughout the Commonwealth, the Pennsylvania Building and Construction Trades Council formally expresses our opposition to DEP's proposed regulations seeking to limit state CO2 emissions through participation in the Regional Greenhouse Gas Initiative (RGGI).

Participation in RGGI will accelerate the closure of Pennsylvania's remaining coal-fired power plants, eliminate thousands of good-paying jobs, including jobs held by members of our affiliated unions, who depend on work in the power generating industry to sustain their careers, which include their PENSIONS and HEALTHCARE BENEFITS and remove \$2.87 billion in economic activity from the state economy.

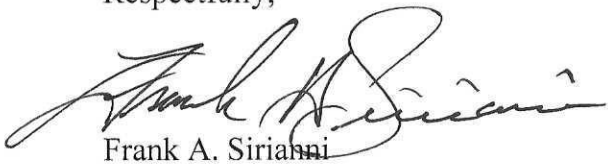
From an environmental standpoint, DEP's RGGI modeling confirms that Pennsylvania's participation in RGGI will not yield any meaningful reduction in statewide or regional CO2 emissions by 2030 beyond what is occurring through current market forces.

Subsequently, participation in RGGI will force the premature closure of the state's remaining coal-fired power plants, and some older natural gas-fired power plants which will have a devastating effect on thousands of our members and shift generation and emissions to neighboring, non-RGGI states.

Lastly, the Air Pollution Control Act requires hearings on proposed regulations to be held in affected communities. Yet, a series of virtual public hearings has been offered by DEP as a substitute without any clear method to validate community engagement and despite the lack of access to broadband internet service by many residents of affected communities. Under these circumstances, at a minimum, consideration of the proposed regulations should be delayed until full engagement with affected communities is possible.

Given the above, we ask the Environmental Quality Board to reject the proposed regulations seeking to authorize Pennsylvania's participation in RGGI. Thank you for considering our position.

Respectfully,



Frank A. Sirianni
President