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From: ecomment@pa.gov
Sent: Monday, January 11, 2021 8:39 AM
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Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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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 am a strong supporter of new, more environmentally friendly methods of producing power. The idea of going green sounds great. It matches with the current socially accepted thoughts that lean towards protection of our environment. Green energy has also in recent times increased in efficiency while decreasing in cost. In the past a product such as solar cells were costly and were only effective on sunny days. Now the technology has progressed to the point that power can be made from starlight. So why not support the RGGI proposal?

Why? Because it is a paranoid response to an issue that the local power plants are not even a major contributing factor in the first place. There are 195 recognized countries in the world. The United States of America has the third largest population. That is an impressive statistic. What is even more impressive is that for the third most populated country we are also a leader in emissions standards and our greenhouse gas emissions are less than 15% of the total global percentage (Althor, Watson and Fuller, 2016). Every year we are reducing emissions as companies are going green and as states start to regulate stricter environmental controls to produce less of an environmental impact. Coal fired powerplants that the RGGI proposal would highly impact are not even the greatest producers of greenhouse gases within the country.

The power plants that can run, must do so under already tight emission standards as it is. They meet these standards. Furthermore, most coal fired plants operate in today's prices at a loss.

This means that they are not running daily as that would be a bad business practice. For instance, Homer City Generating Station is in standby mode more often than running and when it does run it is rarely at full capacity. So, increasing emission standards on a location that is rarely running is counterproductive to a focused proposal that should be aimed at an industry with greater impact on air quality controls.

Sometimes, when the plant is running it is due to a need for the power. A need that will not just disappear if the plant is gone. Without the presence of the effected RGGI proposal plants, power prices could potentially rise as companies are forced to find and or transfer their power through other locations. Locations that may operate with a smaller work force. And even with the current need, coal fired plants are finding it increasingly difficult to run. A difficulty that will only increase as time goes on.

The sad fact is that coal fire plants impact on emissions is overshadowed by the myriad of factories and the multitude of vehicles on the road. And yet it is plants such as the Conemaugh plant that receives the brunt of the focus when environmental concerns come into play. So conceptually the RGGI proposal is a good idea; but the major contributing factors will not just disappear if the proposal came to fruition and the impacts on the environment will not just cease to be.

When we speak of helping the environment, we tend to focus on our neighborhood, but the most populated country in the world, China, also produces the most greenhouse gas emissions. We as Americans are a major contributing factor to this as we purchase products made in China. Products made in factories with little to no emission controls. And yet we focus within our borders without effort to slow the consumerism of international products that have a greater impact on the global emissions. But our blindness goes beyond just that. Emissions are only one method in which we are negatively impacting the environment.

Solar cells are toxic, and we are already seeing them within our landfills as the older models become outdated or broken. In decades they will only increase the toxicity of the soil of our great nation as those of today are disposed of. Windmills are enemies of the birds the world over, plus they can be an eye sore. Nuclear power which is known for its clean emissions has a waste by product that is dangerous for centuries after use. Even many recycled products are made using processes that produce greenhouse gasses and in factories that also have a need for the power that could potentially come from plants such as the Keystone plant in Shelocta.

That is just the environmental side of the issue. A single coal fired powerplant employs a massive work force of employees, contractors, and vendors. This is only the ones that arrive to the plant daily. Throughout the year many others are employed or find contracts within the plants such as Homer City Generating Station. For each this is a job, a paycheck that then finds itself out among the various local business. Coal truck drivers are employed to bring coal from mines. How would the closure of a single plant affect these businesses?

Layoffs and the cutting of employment force, that is how. As people lose jobs in large numbers more and more will have to seek employment outside of the local counties. Which has the potential of leading to families moving out of the area towards more bustling areas. The closure of the plants will absolutely have adverse effects on the local economy.

People from out-of-town have contracts with the plants. These people need places to stay and places to eat. The local workers also spend most of their paycheck within the Indiana County and Westmoreland county areas. The forced closure of any single plant will have a cascading effect on the local economy. As time goes on and the impact becomes greater, we will no longer be able to place economic issues on a plant closure from years earlier but make no mistake it

will be the closure of the plants that is the true factor of future decline.

Does this mean that the plants should be able to continue to run indefinitely as a negative economic impact could always say to exist? No, of course not. But the nationwide coal fired power plants have been closing for more cost-effective methods of production power that do not have the negative social image that coal does. These are not forced but a natural process of business that will always come and go.

Over time these plants will continue to close slowly. A slow close allows the employees to decrease in numbers over a period. Thus, allowing a slow transition from one employment force to another. If a force closer is initiate the process would be much faster and increase individual from having to find employment outside of the area. Contract companies that rely on much of their income from the plants could have time to find other contracts without a fast yank on the chain of their continuity.

The truth of the matter is that for every step we take on our journey through life causes an impact with the earth. Although a utopia society that runs on pixie dust and unicorn dreams is a world worth striving for, it is a world that would have to be built on the ashes of the previous. Instead of creating that utopia through the fast tearing down of still needed economic keystones, it should be created in the natural evolving process of business. A sometimes-slow methodical process of fading out of the less cost effective and socially accepted with the newer more cost-effective replacement. In this case the replacement would have lesser emissions but not necessarily a better environmental impact.

Is the elimination of a fading industry meeting current standards and not always operational the way to go? Is it a sound enough reasoning to create a potentially localized economic catastrophe? Will the RGGI proposal even make a noticeable difference within the greenhouse gases released each year?

If they must close, let us in their communities look for a slower less negative impactful method of doing so. Because to say that the plants should close solely based on some altruistic idea of a cleaner air impact ignores the totality of the issue at hand. That perfect world of a pixie dust and unicorn emissions society should be left for the only place that it belongs, in the fantasy lands of our dreams.

References

Althor, G., Watson, J., & Fuller, R. (2016, Feb). Global mismatch between greenhouse gas emissions and the burden of climate change. *Scientific Reports* 6(20281). Retrieved from <https://doi.org/10.1038/srep20281>

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
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