



Stephen Hoffman

From: ecomment@pa.gov
Sent: Tuesday, January 12, 2021 9:01 AM
To: Environment-Committee@pasenate.com; IRRC; 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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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: CO2 Budget Trading Program (#7-559).

Commenter Information:

Jonathan Crawford
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Comments entered:

Dear Sirs,

I am writing to express that I am strongly opposed to the proposal for Pennsylvania to join the Regional Greenhouse Gas Initiative (RGGI).

My first objection is that the entire proposal is based on faulty assumptions. The stated purpose of the proposed rule is "to reduce anthropogenic emissions of CO₂, a greenhouse gas (GHG) and major contributor to climate change impacts, in a manner that is protective of public health, welfare and the environment in this Commonwealth."(1) This statement is misleading because it fails to recognize that water vapor not CO₂ is the primary greenhouse gas in our environment. In fact water vapor accounts for 95% of greenhouse warming (2). The effect of water vapor is easily seen when clouds shade the landscape during the day or trap heat at night. This also holds true in arid regions where nightly temperature drops are much greater than in tropical climates.

While the data shows that the earth is warming, it does not tell us why. We can see that there is a rise in temperature and a rise in CO₂, but the two rises do not correlate. While CO₂ has risen steadily since 1880, temperatures have not followed the same trend. There have been multiple cooling periods since 1880 (for example 1940-1975 and the early 2000s), but no reversals of CO₂ that correlate. The data does not fit well with CO₂ causing a temperature change. In fact

the data seems to show that temperature leads the CO2 change rather than following it (3). Instead of crediting CO2 as a major factor of temperature change, a more plausible hypothesis is that the earth's temperature is largely regulated by solar activity and the greenhouse effect of water vapor. (4)(5) If this theory is correct, any measures that aim to reduce CO2 will be both unsuccessful and costly.

We are told that the overwhelming majority of scientists recognize man-caused, global climate change to be a fact. This is hardly the case however. There are many well-researched scientists who disagree with the argument that man-generated CO2 is causing or will cause catastrophic heating of the earth and destruction of its climate. (For one of many examples, you may visit the Global Warming Petition Project's website (www.petitionproject.org.) We should not be entering Pennsylvania into the RGGI when the problem it proposes to fix may not even exist.

My second objection is to the cost that Pennsylvanians will experience if we would join the RGGI. Joining a cap-and-trade program such as this one will have many devastating costs that people do not realize. The limits on CO2 emissions will directly translate into higher costs for consumers. The bankrupting of industry will not only cause a loss of jobs, but will ripple-effect through the region. As the energy sector struggles, all of the support businesses will also begin to fold. The resulting unemployment will continue to impact more Pennsylvanians—with the poor likely bearing a disproportionate share. The loss in tax revenue will impact the government's ability to protect the citizens—further harming Pennsylvanians.

Another cost that is frequently overlooked is the human cost. Each year, more people die from cold than die from heat (6). As energy prices rise, more people turn down the heat in their homes during the winter. And elderly people are at the highest risk of exposure. (7) In any decision, we need to be mindful of the unintended consequences. Joining RGGI will destroy Pennsylvania's economy. Should we do something that will harm people to solve a problem that may not even exist?

And to those who may accuse me of not caring for the environment, my third objection to the RGGI is that it has the potential to actually harm the environment. Impoverished people have far fewer resources to care for the environment. If we use our finances to fight a problem that may not exist, we will not have the ability to take care of the problems that do exist. Poorer people aren't able to care for the world they live in. They just live to survive. Unlike wealthy societies that have income available to take care of their environment, poor societies must do whatever it takes just to provide food and shelter. This is why some of the greatest environmental disasters are occurring in the poorest locations and not the wealthy ones. (8) To actually protect the environment, we need to encourage development and economic growth in poor areas. (9) If we join the RGGI and destroy our own economy for a theoretical problem that may not even exist, the impact to our environment may prove greater than we realized.

In conclusion, the idea to regulate CO2 emissions is based on a problem that the data doesn't support; it will harm the economy and the residents of Pennsylvania; and it has the potential to harm the very environment it is touted to protect. In short RGGI is bad for Pennsylvania.

1. Pennsylvania Bulletin. Proposed Rulemaking, Environmental Quality Board [25 PA. CODE CH. 145], CO2 Budget Trading Program. [50 Pa.B. 6212], vol. 50, no. 45, Nov. 7, 2020,
2. P.J. Michaels and R.C. Balling Jr., *The Satanic Gases: Clearing the Air About Global Warming*. Washington, D.: Cato Institute, 2000, p. 25–28.
3. Michael J. Oard and Dr. Jason Lisle. *Global Warming: A Scientific and Biblical Expose of Climate Change*. Coral Ridge Ministries and Answers In Genesis. Dr Larry Vardiman, Institute for Creation Research. 00:06:22
4. Martin Durkin. *The Great Global Warming Swindle*. 00:28:20

5. Arthur B Robinson, Noah E Robinson, and Willie Soon. Environmental Effects of Increased Atmospheric Carbon Dioxide. Oregon Institute of Science and Medicine, artr@oism.org, p. 1-2.
 6. Jeffrey Berko, M.P.H., Deborah D. Ingram, Ph.D., National Center for Health Statistics; Shubhayu Saha, Ph.D., National Center for Environmental Health; and Jennifer D. Parker, Ph.D., National Center for Health Statistics. Deaths Attributed to Heat, Cold, and Other Weather Events in the United States 2006-2010.
 7. QuickStats: Death Rates Attributed to Excessive Cold or Hypothermia Among Persons Aged ≥ 15 Years, by Urbanization Level and Age Group — National Vital Statistics System, 2015–2017. MMWR Morb Mortal Wkly Rep 2019;68:187. DOI: [http://dx.doi.org/10.15585/mmwr.mm6807a8external icon](http://dx.doi.org/10.15585/mmwr.mm6807a8external%20icon). Accessed 1/6/21
 8. Matija Zorn. Natural Disasters and Less Developed Countries. Research Centre of the Slovenian Academy of Sciences and Arts
 9. Michael J. Oard and Dr. Jason Lisle. Global Warming: A Scientific and Biblical Expose of Climate Change. Coral Ridge Ministries and Answers In Genesis. Dr E Calvin Beisner, Cornwall Alliance 00:43:30
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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
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