



Environmental Quality Board  
[RegComments@pa.gov](mailto:RegComments@pa.gov)  
P.O. Box 8477, Harrisburg, PA 17105-8477

January 12, 2020

**Re: Public Comments to the Environmental Quality Board on the DEP's proposed rulemaking on CO2 Budget Trading Program [50 Pa.B. 6212]**

The undersigned individuals are residents of the Lehigh Valley in Pennsylvania passionate about climate mitigation and advocating for market-based solutions. For example, each of us has been promoting HR 763 (Energy Innovation and Carbon Dividend Act), a bipartisan federal bill that would impose an escalating fee based on the greenhouse gas content of fuels, including crude oil, natural gas, coal, or any other product derived from those fuels when used in a manner that emits greenhouse gases into the atmosphere.

As advocates for market-based solutions to reducing greenhouse gases, we are particularly supportive of the DEP's proposed rulemaking to participate in RGGI. We strongly support the adoption of a carbon market in Pennsylvania and endorse Governor Wolf's decision to participate in the Regional Greenhouse Gas Initiative (RGGI), the nation's oldest carbon market.

It is clear from the recent Acadia report referenced in DEP's proposed rule that if we adopt the proposed regulations, our carbon market has the potential to be extremely beneficial to all Pennsylvanians. Properly structured, Pennsylvania's carbon market can:

- **Lower greenhouse gas emissions** significantly and steadily, reducing air pollution statewide and helping to mitigate climate change
- **Create jobs statewide**; DEP estimates that 27,000 net new jobs will be created statewide by 2030. Job creation is absolutely critical as unemployment now stands above 13% in PA.
- **Grow the economy statewide**; Gross state product will increase by at least \$1.9 Billion by 2030. Economic recovery from the pandemic is urgent. Given the dramatic reduction in tax revenues, we must grow the economy in a sustainable way that does not depend on public funding.
- **Improve public health**; RGGI will save at least 639 lives and provide \$6.3 billion in improvements to the health of Pennsylvanians by

2030, by reducing the severity of asthma, other respiratory disease, heart disease and many other health problems caused and exacerbated by air pollution and climate change.

· **Lower energy costs** and save the average Pennsylvanian money through the extensive investment in energy efficiency statewide.

We are not surprised by the findings in the Acadia report as they are consistent with similar findings on the benefits of a carbon fee and dividend program as outlined in HR 763. Similar to HR 763, RGGI harnesses market forces to reduce carbon emissions as cost effectively as possible.

A number of recent polls have shown that Pennsylvanians overwhelmingly support immediate action to reduce air pollution and increase the percentage of clean energy production in the Keystone State. The Yale Climate Nexus poll found that 80% of Pennsylvanians support regulation of CO2 emissions and 72% specifically support RGGI. The Susquehanna Polling and Research survey found strong bipartisan support for solar energy statewide.

Until a broader approach is taken along the lines of HR 763, we believe that Pennsylvania should expeditiously proceed with at least participating in RGGI. This will put Pennsylvania in a stronger position once broader reductions are federally mandated as Pennsylvanians would already have begun to wean themselves from fossil fuels and begun shifting to a cleaner, more efficient economy.

We strongly urge the Environmental Quality Board to approve the DEP regulations expeditiously. As climate change, high unemployment, structural job loss caused by the pandemic, and a public health crisis continue to bear down on Pennsylvania, time is of the essence.

Sincerely,

Arundhati Khanwalkar, 208 North Marshall Street, Allentown, PA 18104  
([Tinkuvolk@me.com](mailto:Tinkuvolk@me.com))

Volkmar Dierolf, 208 North Marshall Street, Allentown, PA 18104  
([vod2@lehigh.edu](mailto:vod2@lehigh.edu))

Martha Christine, 107 Mount Airy Ave., Bethlehem, PA 18018  
([Mrthchristine@gmail.com](mailto:Mrthchristine@gmail.com))

***Additional signatories on page 3***

Jessie Snyder, 797 Parkway Road, Allentown, PA 18104 ([Jesnyder50@aol.com](mailto:Jesnyder50@aol.com))

Karen Norvig Berry, 595 Riverwoods Way, Bethlehem, PA 18018  
([norberry@fast.net](mailto:norberry@fast.net))

Kim Schaffer, 735 Center Street, Bethlehem, PA 18018  
([Kim@communitybikeworks.org](mailto:Kim@communitybikeworks.org))

Dan Schwartz, 2447 Yost Road, Bath, PA 18014 ([das18014@gmail.com](mailto:das18014@gmail.com))

Debra J. Sanek, 3345 Fairland Drive, Schnecksville, PA 18078  
([djs3345@ptd.net](mailto:djs3345@ptd.net))

Fred Sanek, 3345 Fairland Drive, Schnecksville, PA 18078 ([fcs124@ptd.net](mailto:fcs124@ptd.net))

Margaret Church, 435 Brighton Street, Bethlehem PA 18015  
([pegpchurch@gmail.com](mailto:pegpchurch@gmail.com))

Renate Brosky, 3224 Water Street, Whitehall, PA 18052 ([rbrosky@aol.com](mailto:rbrosky@aol.com))

Stephen Brosky, 3224 Water Street, Whitehall, PA 18052  
([steve@stevebrosky.com](mailto:steve@stevebrosky.com))

Kenny Boecker, 1027 Seneca Street , Apt 1, Bethlehem, PA 18015  
([Kenny.boecker@gmail.com](mailto:Kenny.boecker@gmail.com))

Courtney David, 5819 Ricky Ridge Trail, Orefield, PA 18069  
([courtneyadavid@gmail.com](mailto:courtneyadavid@gmail.com))

John Gallagher, 3308 Moravian Court, Bethlehem, PA 18020 ([pilaster@rcn.com](mailto:pilaster@rcn.com))