



## Public Comments to the Environmental Quality Board on the DEP's proposed Carbon Regulations

Dear Secretary Patrick McDonnell:

The undersigned business, environmental, consumer, educational and faith organizations and individuals submit these joint comments in support of the PA Department of Environmental Protection's regulations on a statewide carbon market.

The Pennsylvania Environmental Rights Amendment requires action to reduce climate disruption. Joining the Regional Greenhouse Gas Initiative (RGGI) is one of the many necessary steps. The Pennsylvania Air Pollution Control Act specifically authorizes DEP to join in cooperative interstate arrangements, such as RGGI, that depend on voluntary joint action. The Act further authorizes the regulations. Putting revenues into the Air Pollution Fund is authorized, necessary and beneficial to Pennsylvania's economy and job growth.

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 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.

RGGI harnesses market forces to reduce carbon emissions as cost effectively as possible. Its cap and invest structure and the anticipated investment of auction allowance proceeds in energy efficiency, renewable energy, clean transportation, carbon sequestration and other carbon mitigation efforts will enable PA to accomplish a number of additional goals:

1. It will insure that we meet the target of lowering emissions by at least 3% each year.
2. PA will do so at the lowest possible price. Carbon markets have been shown to reduce energy prices in RGGI states more significantly than in non-RGGI states.

3. Carbon sequestration in soil and the expansion of solar energy will help to save family farms by providing new cash crops.
4. PA will be able to relieve some of the energy burden on low and low moderate income households by improving the energy efficiency of homes statewide.
5. PA will be able to support a just transition for workers in fossil fuel industries.

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.

We strongly urge the Environmental Quality Board to approve the DEP regulations expeditiously in order to implement Pennsylvania's carbon market in a timely manner. 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,

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