RECEIVED Jan 14 2021 Independent Regulatory Review Complication

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Cc:	c-jflanaga@pa.gov
Subject:	Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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Re: eComment System

Stephen Hoffman

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

Commenter Information:

Robin Mann none (robinlmann@gmail.com) 266 Beechwood Drive Rosemont, PA 19010 US

Comments entered:

I am writing to urge the Environmental Quality Board to finalize the proposed rule establishing a CO2 Budget Trading Program enabling Pennsylvania to join the Regional Greenhouse Gas Initiative (RGGI).

I have been a Pennsylvania resident for the last 35 years. I have been involved over that time in efforts to protect the environment, in my community and region and beyond, and in recent decades, the growing climate crisis has been a primary focus. In alignment with the 2012 Mayor's Climate Agreement, I helped lead my community's earlier work to inventory its carbon emissions and adopt a climate action plan. And more recently, with the crisis having deepened, I have helped lead the advocacy prompting my community to commit to 100% clean electricity by 2035 and clean transportation and heating by 2050. A draft energy transition plan is soon to be released. As good as that plan may be, its success will depend in part on policy changes at the state level to unlock the full potential to replace dirty energy sources with clean, and scale them up.

As I have been contemplating this comment opportunity on the proposal for Pennsylvania to join RGGI in recent weeks, a number of experiences have informed my thinking.

First, after a long time separated from out-of-state family, I had a safe visit -- we all got tested -

- from my youngest granddaughter, not quite 2 years old, and her parents. As I introduced her to some of the beautiful nearby open spaces and natural areas, the enjoyment of her discovery was mixed with the sobering recognition that climate change is expected to vastly alter and diminish those areas, and the flora and fauna we observed, in the coming decades.

Secondly, a news program noted a World Health Organization communication about the way in which climate change impacts are aggravating the virulence of the pandemic on the most vulnerable populations of the world. It noted an IPCC finding that "Climatic changes already are estimated to cause over 150,000 deaths annually."

Third, I tuned in to a virtual interview the other day with noted climate science writer Elizabeth Kolbert, author of the Sixth Extinction. She observed that public concern has mounted about climate change as a result of the raging wildfires and super-charged hurricanes of the last couple of years. But people need to understand that our decades of denial and inaction have resulted in built-in momentum, and the effects we are witnessing now are here to stay. She noted that "there are livable outcomes and there are unspeakably awful outcomes." She said, about confronting that choice, "we need to do the best we can; we're not doing that now."

Finally, I reviewed the recent remarks delivered by United Nations Secretary-General Antonio Guterres, comparing the fight against the global pandemic to that against climate change. He noted how badly we have failed to confront climate change with anywhere close to an effective response -- that "emissions are 62 per cent higher now than when international climate negotiations began in 1990." He observed it is not for want of solutions; there are policy levers we have not been willing to pull and need to -- top on his list was a carbon price. And he called on everyone, all levels of government, and business and civil society, to do their part. And he said, "This is an epic policy test. But ultimately this is a moral test."

So, Pennsylvania is, finally, considering joining RGGI -- widely considered an essential but not sufficient step. Pennsylvania emits 1% of global carbon pollution; more CO2 than 172 of the 194 signatories to the Paris Climate Agreement. Clearly, we bear an outsized responsibility for the severity of the climate change impacts we are already witnessing.

So, given all that we know, including:

- that Pennsylvania has outsized responsibility for the damage it is too late to prevent -- in lost lives, accelerated disease and dislocation, commitment of portions of even our own country to being uninhabitable in future decades due to heat and drought,

- that governments at every level, from municipal to nation states, have an essential role in transitioning from dirty, destructive fossil fuels to clean renewable energy as fast as possible,

- that every tool in the toolbox is needed to make that happen at the speed necessary to avoid the most catastrophic impacts in the coming years,

- that RGGI is a tool that has already been proven by the more proactive states in our region, in terms of emissions reductions without negative economic consequences, beneficial health effects from reduced pollution, revenues enabling large-scale investments in energy efficiency and reduced energy burdens,

- and that there are communities right here in PA already suffering disproportionate effects of climate change, or worker displacement from already shuttering plants, that would benefit greatly from prioritized investment of RGGI revenues.

So, given all that, to me the question isn't whether PA should join RGGI, it is WHY NOT? And I don't think there can be any satisfactory answer -- especially morally -- to that question. I urge the Environmental Quality Board and the Department of Environmental Protection to finalize the proposed rule.

Thank you for the opportunity to comment.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely, Jessica Shirley

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