



## **Comments Submitted By**

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**to the**

**Pennsylvania Department of Environmental  
Protection's Environmental Quality Board  
(EQB) regarding the Governor's proposal to  
have Pennsylvania join the Regional  
Greenhouse Gas Initiative (RGGI)**

**January 14, 2021**

The EQB is accepting comments electronically through [DEP's eComment system](#) or e-mail at [RegComments@pa.gov](mailto:RegComments@pa.gov) through January 14. A subject heading of "CO2 Budget Trading Program" and a return name and address must be included in each submission. Written comments may be submitted by mail to: Environmental Quality Board, P.O. Box 8477, Harrisburg, PA 17105-8477

As the General Manager of the Southeastern Pennsylvania Transportation Authority (SEPTA), I am pleased to submit comments on the proposed rulemaking of the Pennsylvania Department of Environmental Protection Environmental Quality Board (Board) regarding the Governor's proposal to have Pennsylvania join the Regional Greenhouse Gas Initiative (RGGI).

As stated in the proposed rulemaking, "We recognize the desire to improve the environment and reduce Greenhouse Gas (GHG) emissions. Given the urgency of the climate crisis, including the significant impacts on this Commonwealth, the Board determined that concrete, economically sound and immediate steps to reduce GHG emissions are necessary. As one of the top GHG emitting states in the country, the Board has a compelling interest to reduce GHG emissions to address climate change and protect public health, welfare and the environment."

On behalf of SEPTA, I would like to take this opportunity to highlight the many ways that mass transit is already reducing GHG emissions and how additional investment in public transportation can accelerate achievement of the Commonwealth's desired carbon emission reductions to improve the quality of life for all Pennsylvanians.

As described in the proposed rulemaking, RGGI is also referred to as a "cap and invest" program, because unlike traditional cap and trade programs, RGGI provides a "two-prong" approach to reducing CO<sub>2</sub> emissions from fossil fuels. The first prong is a declining CO<sub>2</sub> emissions budget, and the second prong involves investing the proceeds from the auction of CO<sub>2</sub> allowances in initiatives to further reduce CO<sub>2</sub> emissions.

Similarly, mass transit is inherently sustainable and a proven reducer of greenhouse gas (GHG) emissions, while investment in public transportation will produce environmental dividends that quickly and effectively achieve Pennsylvania's carbon-reduction goals and environmental sustainability.

In Southeastern Pennsylvania, SEPTA commuters have 1/3 the carbon footprint of those who travel by personal car. In 2018, transit riders prevented more than 2.5 billion pounds of CO<sub>2</sub> emissions from entering the atmosphere. As a result, the share of emissions from transportation in Philadelphia is 10 percent below the national average. This differential reflects the emissions-reducing power of a comprehensive transit network.

SEPTA operates one of the largest zero-emission vehicle fleets in the nation by virtue of a fully-electrified rail system that carries 50 percent of all transit passengers. SEPTA is also building one of the largest "green" bus fleets in the nation – by next year, more than 90 percent of SEPTA's bus fleet will be either battery or hybrid-electric. Across Pennsylvania, transit systems operate clean-burning Compressed Natural Gas (CNG), battery electric and hybrid-electric buses that reduce GHG emissions in communities throughout the state.

SEPTA's award-winning Sustainability Program includes alternative energy projects that further reduce SEPTA's carbon footprint and improve the environment. In 2020, SEPTA entered into a long-term power contract for two solar farms in Franklin County, PA, which will offset nearly 20

percent of SEPTA's annual GHG emissions from electricity consumption. Other projects include recent investments in 11 megawatts of energy storage at substations along the Market-Frankford and Broad Street Lines and 3 megawatts of solar photovoltaic panels on the roofs of four SEPTA facilities. These projects and others represent SEPTA's enduring commitment to reduce emissions and improve air quality in the region.

Southeastern Pennsylvania is growing faster than it has in a generation and is powering the Commonwealth's economy. The region is one of the most economically productive and densely populated in the United States, generating 42 percent of the entire state's economic output on just five percent of its land. A byproduct of growth has been increased congestion and traffic on our roadways, which not only threatens to short-circuit the region's future economic potential but also recent progress towards environmental objectives. For example, in recent years the region has made strides toward decreasing ground-level ozone pollution and shedding its designation as a "marginal nonattainment area." Cars idling on the region's highways for hours per day put this progress at risk.

Mass transit can mitigate the risks of congestion and power the next generation of environmental progress. SEPTA buses, trains and trolleys typically transport the equivalent of 10 sold out Beaver Stadiums every day, removing thousands of pollution-emitting cars from our roads. Investment in southeastern Pennsylvania and SEPTA can accelerate environmental sustainability, while also promoting inclusive economic growth, job creation and equity.

SEPTA and transit systems across the Commonwealth can play a valuable role in the state's carbon emission reduction and investment strategy. We hope you will consider us partners in your deliberations and cross-sector efforts to improve environmental conditions for future generations of Pennsylvanians. Thank you for the opportunity to provide comments on this important topic.