



Stephen Hoffman

From: ecomment@pa.gov
Sent: Thursday, January 14, 2021 4:15 PM
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)

CAUTION: **EXTERNAL SENDER** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



Re: eComment System

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

Commenter Information:

Edward Cullen
 (ecullen.montvalepharma@yahoo.com)
 721 Linnet Lane
 State College, PA 16803 US

Comments entered:

I am writing to express my wholehearted support for Pennsylvania's participation in RGGI. The rulemaking document published in the Pennsylvania Bulletin was very helpful and informative, and I'd like to thank everyone who was involved in preparing it. The document provides excellent descriptions, together with references, for the many reasons why Pennsylvania should join RGGI. Extensive and highly credible scientific evidence shows that if we do not curb the impacts of anthropogenic climate change, there will be serious negative consequences for the health and safety of current and future generations of Pennsylvanians. The Rulemaking also provides information about the numerous positive ways that RGGI would improve economic growth and job creation in the Commonwealth.

The Rulemaking requests feedback on three specific topics (Section D on Page 6212 of the Proposed Rulemaking). I would like to comment on two of these: environmental justice and assisting with transitions for people affected by downturns in fossil fuel industries.

Environmental Justice. Despite the long history of environmental injustice in the US, there is relatively little information available about policies and programs that have successfully addressed this issue. To help guide the formulation of effective policies in Pennsylvania, the Commonwealth should 1) make current information on greenhouse gas emissions and environmental pollutants available to the public and to Commonwealth, county and local

government officials in easily accessible and digestible formats, and 2) plan to collect additional data throughout the Commonwealth on the distribution and levels of environmental pollutants, and make these available to the public and government officials as well. Information should include the locations and data for Super Fund sites and other impairments, as well as data on greenhouse gas emissions and pollutant levels. Efforts to create and publish Greenhouse Gas Inventories are already under way in Pennsylvania ([https://www.dep.pa.gov/Citizens/climate/Pages/GHG-Inventory.aspx#:~:text=In%202017%2C%20\(the%20most%20recent,90%20percent%20of%20these%20emissions.\)](https://www.dep.pa.gov/Citizens/climate/Pages/GHG-Inventory.aspx#:~:text=In%202017%2C%20(the%20most%20recent,90%20percent%20of%20these%20emissions.))) and these efforts should be continued. However, data from the Environmental Defense Fund (EDF) indicate that a substantial amount of the data provided to the PA Department of Environmental Protection (DEP) on methane emissions by individual companies is not accurate ([https://www.dep.pa.gov/Citizens/climate/Pages/GHG-Inventory.aspx#:~:text=In%202017%2C%20\(the%20most%20recent,90%20percent%20of%20these%20emissions.\)](https://www.dep.pa.gov/Citizens/climate/Pages/GHG-Inventory.aspx#:~:text=In%202017%2C%20(the%20most%20recent,90%20percent%20of%20these%20emissions.))).

The following table illustrates some of the discrepancies between EDF data and company-reported data for methane:

Methane Emissions (tons)	EDF- Estimated	Company- Reported	Ratio (EDF / Company)
All Wells			
Indiana County	1,632,300	103	15,848
Armstrong County	1,180,800	12,000	98
Susquehanna County	926,100	7,800	119
McKean County	925,700	86,300	11
Westmoreland County	822,000	14,800	56
Washington County	814,700	81,100	10
Bradford County	745,900	69,500	11
Warren County	707,700	31	22,977
Greene County	698,500	32,300	22
Jefferson County	673,500	2,300	293
Clearfield County	606,700	5,400	112
Fayette County	527,200	22,700	23

[please see attachment for Table in clear pdf format]

If policymakers are to make sound decisions about enforcing current permits, and reviewing future permits with environmental justice goals in mind, they will need ready access to relevant and accurate data. The Commonwealth should consider using funds from RGGI to produce reliable and accurate data on greenhouse gas emissions and levels of environmental pollutants throughout the Commonwealth. Revenue from RGGI could also be used to fund either independent laboratories or government laboratories, or a combination of both, to conduct accurate testing of greenhouse gases and environmental pollutants. RGGI funds should also be used to put systems in place to make the data accessible to policy makers and the public. Whenever possible, data on environmental pollutants should be made available to the Pennsylvania Department of Health so that they can provide input on the implications of pollutants for public health.

Transition to Employment in Cleaner Sectors. The rulemaking proposes using RGGI-generated funds to help businesses and employees transition to non-fossil fuel industries. The proposals also complement efforts to limit greenhouse gases and environmental pollutants, and sound

reasonable to me. Proposals include efforts to plug abandoned oil and gas wells, promote the use of electric vehicles through infrastructure projects such as installing electric charging stations, carbon capture sequestration programs, cogeneration, energy storage, and vocational training. Using RGGI-generated funds to train and employ people to detect and plug abandoned wells and methane leaks sounds like an especially efficient way to support transitions.

These links provide access to the attachments provided as part of this comment.

Comments Attachment: [EC 1-14-21 Comments on Proposed Rulemaking CO2 Trading Program #7-559.pdf](#)

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov