



**VIA E-COMMENT**

January 14, 2021

Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477

**Re: CO2 Budget Trading Program - Notice of Proposed Rulemaking, 50 Pa.B. 6212**

Dear Members of the Environmental Quality Board,

The undersigned local and statewide organizations and Pennsylvania residents hereby submit the following comments in response to the Environmental Quality Board (EQB) Proposed Rulemaking – CO2 Budget Trading Program.

The proposed CO2 Budget Trading Program provides a distinct opportunity to address the impacts of environmental pollutants, while allowing auction proceeds to remediate economic inequities often resulting from climate mitigation efforts. As such, we are supportive of the proposed program, and urge its adoption. Nevertheless, as explained below, we recommend that enhanced regulatory protections are included in the rulemaking to further safeguard low income communities and communities of color against economic and localized environmental consequences that may result from the program.

Low income communities and communities of color are disproportionately impacted by environmental pollutants – both inside their homes and in their surrounding communities. At the same time, solutions to remediate environmental pollutants can be quite costly – and can threaten the ability of low income communities and communities of color to maintain critical energy services to their home.

To help ensure the protection of vulnerable communities from these intersectional issues when implementing the proposed CO2 Budget Trading Program, we offer two recommendations:

- *First, we recommend that the regulation include a triennial assessment and remediation plan. The assessment should examine the economic and environmental impact of RGGI on low income communities, communities of color, and frontline communities, and should include a plan for remediation of identified impacts. The assessment should be subject to a robust and inclusive public input and comment process to ensure that solutions are grounded in local solutions.*
- *Second, we recommend that the regulation include principle guidelines for reinvestment to ensure that low income communities and communities of color are prioritized for investment of program proceeds. Specifically, we recommend that the proposed rule include language that prioritizes reinvestment in programs that are administered by local, community-based organizations and measurably improve the availability of energy efficiency and usage reduction assistance for low income households.*

While Pennsylvania has a number of energy efficiency programs that serve low income families each year, there are tremendous gaps in those programs that prevent many of Pennsylvania's most vulnerable households from receiving services to reduce energy costs, improve indoor air quality, and offset bill impacts that may be caused by the proposed regulation. Targeting reinvestments to fill the gaps in existing programs would help to measurably improve Pennsylvania's affordable housing stock, strengthen Pennsylvania's skilled workforce, and provide critical economic relief to low income households.

**Vulnerable communities should not bear any cost – direct or indirect – for joining RGGI. Indeed, energy affordability is a significant driver of environmental justice. We cannot achieve one without the other.**

Thank you for the opportunity to provide input on this important proposed rulemaking.

Respectfully Submitted,  
*On behalf of the undersigned organizations and individuals.*



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