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January 14, 2021



Environmental Quality Board
Rachel Carson State Office Building
400 Market Street, 16th Floor
P.O. Box 8477
Harrisburg, PA 17105-8477

RE: Proposed Rulemaking: #7-559 – CO2 Budget Trading Program

To the members of the Environmental Quality Board:

On behalf of the Philadelphia Building & Construction Trades Council and its affiliated unions, I am writing to express our opposition to the DEP's proposed regulations seeking to limit state CO2 emissions through participation in the Regional Greenhouse Gas Initiative (RGGI).

As three different advisory committees have made clear through their respective votes on the proposed regulations, Pennsylvania's participation in RGGI will **not** benefit the state economically or environmentally. Participation in RGGI will quickly accelerate the closure of Pennsylvania's remaining coal-fired power plants, **eliminating thousands of good-paying jobs, including those held by members of our affiliated unions who depend on work in the power generating industry to sustain their careers.** The closures will also result in the loss of \$2.87 billion in economic activity from the state economy. In addition, communities that depend on tax revenue from currently operating power plants to fund their school districts and essential services will be devastated. It will take them years to recover.

From an environmental standpoint, DEP's RGGI modeling confirms that Pennsylvania's participation in RGGI will not yield any meaningful reduction in statewide or regional CO2 emissions by 2030 beyond what is occurring through current market forces. Instead, participation in RGGI will force the premature closure of the state's remaining coal-fired power plants, and some older natural gas-fired power plants, and result in power generation operations shifting to neighboring, non-RGGI states.

It should also be noted that consideration of the proposed regulations is occurring at a time when the challenges of the ongoing COVID-19 pandemic have substantially compromised the public's ability to engage state officials. In fact, the Air Pollution Control Act requires hearings on proposed regulations to be held in affected communities. A series of virtual public hearings has been offered by DEP as a substitute, but without any clear method to validate community engagement. The lack of access to broadband internet service by many residents of these affected communities further impedes public input. Under these troubling circumstances, consideration of the proposed regulations should be delayed until full engagement with affected communities is possible.

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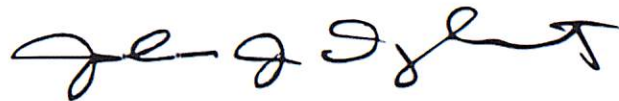
MARK WILDSMITH
JOSEPH WILLIAMS

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Given all of these issues, we respectfully ask the Environmental Quality Board to reject the proposed regulations seeking to authorize Pennsylvania's participation in RGGI.

Thank you for considering our position.

Respectfully,

A handwritten signature in black ink, appearing to read "John J. Dougherty". The signature is fluid and cursive, with a prominent initial "J" and a long horizontal stroke at the end.

JOHN J. DOUGHERTY
Business Manager

JJD/kr
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