



Stephen Hoffman

From: ecomment@pa.gov
Sent: Thursday, December 3, 2020 9:24 AM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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Re: eComment System

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

Commenter Information:

Suzie Morris
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373 Dunbar Ohiopyle Rd
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Comments entered:

Dear Secretary - EQB Patrick McDonnell,

Please don't forget that the air was so dirty in Pittsburgh that you could not see across the river, the streetlights were on in the middle of the day, the men had to change their white dress shirts two or three times a day because shirts would be covered in soot. There is a reason Southwestern PA has such a high number of people on disability. Why do we keep using our air, water and land to dump our toxins! People come to Ohiopyle State Park by the thousands to enjoy clean air and water. Most don't realize that not so many years ago the Youghiogheny River was dead, supported no fish because water was so polluted. We need to educate young people so they realize how fragile our environment is and what we can do to help. For heaven's sake make recycling mandatory. That doesn't mean sending our plastic to other countries to dump on their land or sending our dirty coal for them to use.

- When issuing air pollution permits, the Department must base its final determination on an informed decision. This decision must be based on a macro level. Information such as the residents' testimony, current and proposed ambient air quality, permittee's violation history, public benefit, population statistics, nearby schools, long-term care facilities, nursing homes, and

cost-benefit analysis must be considered.

- Adaptive management is crucial. RGGI should contain specific mechanisms to study the impacts and adjust for effects that are unexpected or undesirable. A vague commitment to the concept of adaptive management is not sufficient; specific, mandatory follow-up measures must be integrated into the regulations where possible. We know there are often unforeseen flaws that require modification after a cap-and-invest system like RGGI is in place. That is why it is essential to conduct the appropriate studies and report the findings to the public.

- The direct effect of RGGI is likely to be regressive: it will disproportionately burden low-income households with higher energy prices as producers pass emissions-reduction costs on to consumers. Therefore, Pennsylvania should use auction revenues to counter this effect. One advantage to RGGI, as opposed to more conventional regulation, is that while both may increase consumers' prices, allowance auctioning provides a funded mechanism for countering the effect. Additionally, the auction revenues should be invested back into the very communities that have historically and presently face the burden of fossil fuel power plant pollution. Investment into community schools, greenspaces, and sustainable well-paying jobs should be a priority.

- The Department should not allow certain fossil fuel power plants (i.e., coal waste fire power plants and combined heat and power energy sources) to externalize the polluting cost completely. RGGI can be tailored to fit the needs of the Commonwealth. Currently, the Commonwealth requires a cap-and-invest program that will lower emissions and earn funds. Therefore, by allowing certain fossil fuel power plants to not pay for their emissions, the state loses one of the central pillars of an effective cap-and-invest program. Instead, if the RGGI program charged a reduced rate for the same power plants, the goal of lowering emission levels and generating funds are both met without the burden of pollution falling on the state and the taxpayer.

Thank you for your consideration and the ability to provide comments on such an important topic.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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