



Stephen Hoffman

From: ecomment@pa.gov
Sent: Sunday, December 6, 2020 2:42 PM
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:

H.Scott Laird
 Mr. and Mrs. (hslaird@aol.com)
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Comments entered:

Thank you for the privilege of submitting comments to the Environmental Quality Board (EQB) of the Commonwealth of Pennsylvania regarding the proposed rule for the Commonwealth to take part in the the Regional Greenhouse Gas Initiative (RGGI). I hereby urge the EQB to approve this proposal. I am a private citizen and do not submit these comments on behalf of any organization. I am an honorably retired, former professional geologist in Pennsylvania and Delaware, as well as a former licensed site remediation professional in the State of New Jersey. My comments reflect my personal opinion, informed by my education and experiences, about the gravity of our future climatic conditions for my adult children and my small grandchildren. I believe we are facing an existential climatic crisis with long-term implications not seen since the Second World War. The decision of the EQB will have an important bearing on this Commonwealth's part in responding to this crisis. I also offer comments based on technical information for which I have cited references in peer-reviewed government documents. The facts and data gathered, analyzed and evaluated by the best-trained scientists in the world must be recognized and factored into your decision. I have previously testified to my Tredyffrin Township Board of Supervisors in favor of going to 100% renewable power sources which the Board approved this year by a 6-1 vote.

The Fourth National Climate Assessment identified several critical climatic effects from a human-caused rise in the global annual average temperature (AAT) relative to pre-industrial times.[Wuebbles, D.J et al., 2017. Executive Summary/ Client Science Special Report: Fourth National

Climate Assessment, Volume I; In Wuebbles, D.J. et al., editors, U.S. Global Change Research Program, Wash. D.C., USA, pp.12-34.]

- Global AAT has increased by about 1.0°C over the past 115 years (1901-2016). This period is now the warmest in the history of modern civilization. Recent years have also seen record-breaking weather extremes and the warmest years on record for the globe. These trends are expected to continue over climate timescales. Green house gas (GHG) emissions are the dominant cause of the observed warming since the mid-20th century. The largest observed changes in the U.S. have occurred in the Northeast.
- Heavy rainfall is increasing in intensity and frequency across the U.S. and is expected to continue to increase. The largest observed changes in the U.S. have occurred in the Northeast.
- Heat waves have become more frequent in the U.S. since the 1960's, while extreme cold temperatures and cold waves are less frequent. Recent record-setting hot years are projected to become common in the near future for the U.S., as AATs continue to rise. Over the past 115 years, the AAT increased 1.0°C and is expected to increase 1.4°C.
- The magnitude of climate change will depend primarily on the amount of GHGs (especially CO₂) emitted globally. Without major reductions in emissions, the increase in global AAT relative to pre-industrial times could reach 5°C by the year 2100. With significant reductions in emissions, the increase in global AAT could be limited to 2°C or less.

The Intergovernmental Panel on Climate Change (IPCC) reports that the increase in global AAT has increased the the frequency and magnitude, strengthening evidence of how an increase in global AAT of 1.5°C or more could impact natural and human systems. Their climate models project robust differences in regional climate between present-day and global warming up to 1.5°C, especially for temperature extremes including eastern North America. [IPCC, 2018: Global Warming of 1.5°C Above Pre-industrial Levels and Related Global GHG Emission Pathways, in the Context of Strengthening the Global Response to the Threat of Climate Change, Sustainable Development, and Efforts to Eradicate Poverty, p.177.]The report concludes that limiting global warming to 1.5°C would limit globally risks and reduce the probability of heavy precipitation events, extreme drought, precipitation deficits, and water availability. More germane to the proposed RGGI, the report concludes:

“Though CO₂ dominates long-term warming, the reduction of warming short-lived climate enforcers, such as methane and black carbon, can in the short-term contribute significantly to limiting warming to 1.5°C above pre-industrial levels. Reductions of black carbon and methane would have substantial co-benefits, including improved health due to reduced air pollution. This, in turn, enhances the institutional and socio-cultural feasibility of such actions.” [IPCC, 2018, Op. cit., p.316]

Particulate emissions have contributed to soil quality impacts at locations where they are “consistently present in the environment of the region of the site and which has not been influenced by localized human activities”, i.e., not point source of pollution involved. Joining the RGGI would provide a co-benefit as mentioned in the IPCC report. Research conducted by The New Jersey Department of Environmental Protection revealed that regulated toxic metal compounds were found to exceed natural background concentrations, and residential health-based soil standards due to “ambient deposition”. [Sanders, P.F., 2003, “Ambient Levels of Metals in New Jersey Soils”, NJDEP Division of Science Research and Technology, Environmental Assessment and Risk Analysis Element, Research Project Summary]. The westerly-prevailing wind direction from PA toward NJ has the potential to carry such particulate constituents, and over many years may have contributed to ambient deposition concentrations up to undesirable levels. Efforts to reduce GHG emissions through the RGGI will increase the potential to reduce particulate emissions containing metals or other chemical constituents which may be deleterious to human health.

In closing, where I live at the junction of Delaware, Montgomery and Chester Counties, the number of air quality health alerts, due to exceeding the CAA attainment levels, is too high during the warmest months. My children like to run for exercise when visiting me, and they are jeopardizing the health of their lungs from microscopic particles of soot and elevated ozone,

especially when jogging. Accordingly, I favor joining the RGGI as a critical step forward to restoring our climate regionally as well as internationally.

Very truly,

H. Scott Laird, M.S.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,

Jessica Shirley

Jessica Shirley

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