



Stephen Hoffman

From: ecomment@pa.gov
Sent: Wednesday, December 16, 2020 1:42 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:

Barbara Litt
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Comments entered:

Submitted by Barbara R. Litt, private individual, residing in Pittsburgh, Pennsylvania
 Submitted on December 14, 2020

To Whom it May Concern:

I am writing to support the above-referenced Proposed Rulemaking to institute a CO2 Budget Trading Program with an initial cap in 2022 of 78 million tons CO2 or lower, with the cap declining each year, having the Commonwealth of Pennsylvania to join the Regional Greenhouse Gas Initiative. I am commenting as an individual, informed by my Unitarian Universalist faith and my 60 years on this planet. Two principles of my faith are the inherent worth and dignity of every person (1st Principle), and respect for the interdependent web of all existence, of which we are a part (7th Principle). I cite these to show that my feelings are not simply personal opinions, but are deeply held principles, shared by many. We have a moral and ethical responsibility to make our actions align with our beliefs.

There are many compelling reasons to join RGGI. By doing so, we in PA can significantly decrease greenhouse gas (GHG) emissions, in a relatively short time frame. We can also significantly reduce emissions of air toxics that cause serious health impacts for people living in airsheds contaminated by dirty power plants.

Anthropogenic climate change is not some future theory. It is an ongoing emergency, already happening. There are many indications that it is happening faster than climate scientists had hoped, due to the many feedback loops and phase changes that occur in complex natural systems. According to the National Centers for Environmental Information (NCEI)

In 2020 (as of October 7), there have been 16 weather/climate disaster events with losses exceeding \$1 billion each to affect the United States. These events included 1 drought event, 11 severe storm events, 3 tropical cyclone events, and 1 wildfire event. Overall, these events resulted in the deaths of 188 people and had significant economic effects on the areas impacted. The 1980–2019 annual average is 6.6 events (CPI-adjusted); the annual average for the most recent 5 years (2015–2019) is 13.8 events (CPI-adjusted).
(Source: <https://www.ncdc.noaa.gov/billions/> accessed 12/15/2020)

I used to pay close attention to the steady drumbeat of scientific evidence documenting climate change, from when I first learned of the threat in the mid 1980s, through 2018. I felt sure that if people understood that it was happening we would collectively take action to stop it and to adapt to it, for the future of life on this planet. While I still cling to hope and continue to work to make it so, my feelings have turned to dread. With each alarming development, each further degradation of the Antarctic ice sheet, each report of Arctic tundra burning, each devastating fire season, each flood or drought taking out crops and housing, each deforestation in the name of greed and development, each new pest or vector-borne disease that takes advantage of warmer temperatures to extend its reach, with each of these things, the collective trauma became too much for me to bear. Now, to protect myself, I note a numbness where I used to feel pain, and I try to avoid thinking too much. The alternative is too painful to bear.

The signs of climate change in progress are evident in Pittsburgh too. For example:

- Increased heavy participation, leading to landslides that closed local roads and condemned houses in 2018 and 2019.
- My friend's car that was totaled when a tree with shallow roots in saturated soil fell on it as she drove down Ellsworth Ave. in Shadyside.
- Drought in the summer of 2020, impacting the Somerset County farm that provides my CSA.
- The polar vortex, with its sudden cold that damages buds and blossoms on fruit trees—loss of the apple and peach crop.
- Last winter, hardly any ice skating at outdoor Schenley Rink, and not enough snow to go cross country skiing in the Laurel Highlands.

The state of Pennsylvania emits more GHG than many whole nations, and the electricity sector has the second largest emissions of any sector in the state. RGGI is the best regulatory tool available now to reduce GHG emissions in the state significantly. By charging a fee to emit CO2 and placing a cap that decreases each year on the amount of GHG emitted, the amount of carbon pollution can be greatly reduced while raising revenue for the state, as electric utilities use a market mechanism to efficiently trade out dirty coal and natural gas generation, for clean and renewable electricity sources. Therefore, I implore you to approve this proposed rulemaking with no major revisions.

Revenues raised can be used to fund energy efficiency programs to further reduce emissions of GHGs. Finally, because CO2 emissions offsets are also allowed, the CO2 emissions trading regime may end up with dirty plants still operating in places where they are perceived to be cheaper. These may be so-called "Environmental Justice" communities, and they should be prioritized for both investment in energy efficiency and for better monitoring of air pollutants. These communities have borne the brunt of exposure to air toxics from coal-fired power plants. They should be prioritized to receive benefits of RGGI.

In summary, please support the proposed rulemaking, possibly with minor adjustments to address issues in Environmental Justice communities.

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

Comments Attachment: [RGGI Comments Litt.pdf](#)

Please contact me if you have any questions.

Sincerely,
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