



Stephen Hoffman

From: ecomment@pa.gov
Sent: Tuesday, December 15, 2020 3:07 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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The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 5 (1pm) - #7-559
Testimony date: 12/10/2020 12:00:00 AM
Testimony location: WebEx

Re: eComment System

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

Commenter Information:

Dieynabou Barry
 Partnership for Working Families (dieynabou@forworkingfamilies.org)
 1800 Davidson Ave Apt H1
 Bronx, NY 10453 US

Comments entered:

Hi, my name is Dieynabou Barry and I am the Climate Justice Lead at the Partnership for Working Families. I work closely with POWER on their energy campaigns. I was born and raised in the South Bronx, the poorest congressional district in the U.S. and one of the heaviest polluted neighborhoods in New York City. I am no stranger to polluted air and the negative health effects that follow. At the height of the pandemic, my zip code was one of the hardest hit and this can be tied to the fossil fuel operations that have led my family, friends, and neighbors to live with respiratory illnesses which ultimately led to their suffering and in some instances, death. Climate change is personal to me and my neighborhood and as we know, tackling climate change requires working together on a global scale. This is why Pennsylvania joining RGGI is important to me. Yes, for the greenhouse gas emission reductions, but also for redressing environmental harms that low-income, immigrant, Black, Latinx, Indigenous, and other communities of color have had to bear and will continue to bear as the climate crisis deepens.

It is imperative that equity is centered in the RGGI rule-making process for environmental and climate justice to be achieved. Although RGGI is designed to reduce the total emissions in Pennsylvania, it is possible that hot spots will emerge or in some cases heighten in low-income and communities of color that are already burdened by pollution. So we may see emissions decrease statewide, while they actually increase in certain communities. If RGGI is designed without equity, emission allowances might disproportionately end up in the hands of dirtier plants, which are themselves disproportionately located in these environmental justice communities or some power producers may shift generation and/or build new power plants in these areas because it is cheaper and the communities are politically disenfranchised. Therefore, it is important the Environmental Quality Board ensures that fossil fuel plants do not increase their emissions. The Department must rely upon site-specific data to inform the full scope of existing and potential degradation and to impose additional conditions that are necessary to prevent and remedy degradation. In addition, the board should ensure that low-income and communities of color receive an equitable share of co-pollutant reduction benefits. The rule-making should equitably distribute environmental and economic benefits to disproportionately impacted communities that have faced historic environmental disparities, severe economic harm, or demonstrated cumulative impact of environmental risk.

Additionally, to redress environmental harm, investments must be made in environmental justice communities. A low estimate of the revenue generated through RGGI in Pennsylvania is \$300 million in the first year. It should be required that environmental justice communities who do not see an immediate decrease in emission levels should receive no less than twenty percent of the funds earned from RGGI to fund environmental and health mitigation projects. These projects such as solar power infrastructure, home weatherization, and utility credits, should be prioritized in the communities where emission levels are not decreased in the first five years under the RGGI program.

Moreover, the board should allocate no less than 50 percent of the funds generated from RGGI into a new fund to invest in projects that will either remediate injury from past adverse side effects caused to low-income and environmental justice communities or invested into programs that will prevent future harm in such communities. This would include investments into projects such as renewable energy infrastructure, energy efficiency development, and pollution mitigation projects in the state's most impacted communities.

I know as a resident of New York that RGGI has the power to decrease carbon emissions and generate revenue to invest in communities like mine. I also know that without centering equity in the rule-making, communities like mine won't reap the health and economic benefits of RGGI. Let Pennsylvania learn from New York's experiences and ensure rulemaking includes equity considerations. Thank you for your time.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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Director, Office of Policy

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