

*International Brotherhood of*  
**BOILERMAKERS • IRON SHIP BUILDERS**

SUBORDINATE LODGE NO. 13

OFFICE@BOILERMAKERS13.ORG  
 WWW.BOILERMAKERS13.ORG



**BLACKSMITHS • FORGERS**

2300 NEW FALLS ROAD  
 NEWPORTVILLE, PA 19056  
 OFFICE (215) 785-5536  
 FAX (215) 785-5867



December 18, 2020

Environmental Quality Board  
 16th Floor Rachel Carson State Office Building  
 400 Market Street  
 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 562 hard-working members of Boilermakers Local Lodge 13, this is sent to express our opposition to 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, **eliminate thousands of good-paying jobs, including those of our members who depend on work in the power generating industry to sustain their careers**, and remove \$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 school districts and essential services will be devastated and will take years to recover.

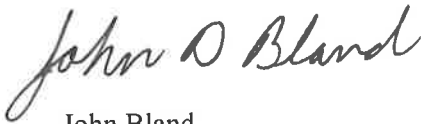
From an environmental standpoint, DEP's RGGI modeling confirms that Pennsylvania's participation in RGGI will not yield any meaningful reduction in statewide or regional CO2 emissions by 2030 beyond what is occurring through current market forces. Instead, participation in RGGI will force the premature closure of the state's remaining coal-fired power plants, and some older natural gas-fired power plants, and shift generation and emissions 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 current COVID-19 pandemic have substantially compromised the public's ability to engage state officials. In fact, the Air Pollution Control Act (APCA) requires hearings on proposed regulations to be held in affected communities. Yet, a series of virtual public hearings has been offered by DEP as a substitute without any clear method to validate community engagement and despite the lack of access to broadband internet service by many residents of affected communities. Under these circumstances, at a minimum, consideration of the proposed regulations should be delayed until full engagement with affected communities is possible.

Moreover, the process with which consideration of the proposed regulations is proceeding is arguably unconstitutional. Supporters of RGGI frequently cite the state constitution and the APCA as the legal basis for proceeding without legislative approval. However, since a core component of RGGI is to raise revenue for state investment, Pennsylvania's participation in RGGI must be considered by the General Assembly as matters of taxation and revenue are its clear, constitutionally mandated jurisdiction.

Given the above, we 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 cursive script that reads "John O Bland".

John Bland  
Business Manager  
Boilermakers Local Lodge, Philadelphia