



Stephen Hoffman

From: ecomment@pa.gov
Sent: Wednesday, December 23, 2020 12:18 PM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com; siversen@pahouse.net
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

CAUTION: **EXTERNAL SENDER** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 3 (1pm) - #7-559
Testimony date: 12/9/2020 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:

Steven Greenspan
 (sgreenspan@gmail.com)
 505 South 10th St., Apt J
 Philadelphia, PA 19147 US

Comments entered:

Please accept the following text (or attachment) as the extended version of the oral testimony presented on Dec 9, 2020 at approximately 3pm (I was presenter #24).

Testimony for CO2 Budget Trading Program Regulation

Good Afternoon. My name is Steven Greenspan. I have a PhD in Cognitive Psychology and before retiring I was a vice president at a fortune 500 IT company, where I conducted scientific research and supported green business strategies. I am also a resident of Philadelphia and am grateful for this opportunity to address the Environmental Quality Board. As a resident, I pay taxes to haul away my trash and sewage. Likewise, businesses pay to have their trash removed and are expected to cleanup any toxic wastes that they dump in land or in water. Air pollution is the exception. Companies that burn natural gas to create electricity, pollute the air with

greenhouse gases and toxins such as Sulfur Dioxide. And they do so with impunity. For these companies, our atmosphere is a free dumping ground!

Industrial CO2 emissions are a principal factor in climate change. The resulting increases- in-ground level ozone , causes or further aggravates a variety of respiratory ailments. The societal consequences include premature deaths, increased healthcare costs, loss of work due to illnesses, and increased vulnerability to viruses such as COVID19.

These damages are not evenly distributed. They tend to be concentrated in communities that are located near or downwind from the factories that emit greenhouse and other toxic gases. These Environmental Justice communities are typically black or brown or low income. For decades they have been unjustly burdened with the toxic emissions of nearby power generating plants, and therefore they – the EJ communities -- should be the major beneficiaries of the income derived from RGGI.

RGGI is not a cure-all for climate change or social injustice, but it can be a vital part of our state's response. The states that participated in RGGI reduced emissions from fossil fuels far more than other states that did not cap carbon emissions. The revenue generated from selling allowances has been invested in clean energy and energy efficiency. The DEP projects similar benefits for Pennsylvania, including a net increase of 27,000 jobs and hundreds of millions in state revenue. These are strong arguments for linking to RGGI and I urge the EQB and DEP to advance the draft rulemaking with urgency and with the following considerations:

1. A recent study from the U of Massachusetts discovered an unintended consequence of RGGI that needs to be avoided in Pennsylvania.[1] Under RGGI, carbon pricing and allowances encouraged some companies to shift power production to dirtier factories. The consequence was increased sulfur dioxide emissions near EJ communities that are in large population centers. This should not be allowed to happen in Pennsylvania! I urge the Department to adjust the rules and to use its authority to prohibit increasing emissions from any fossil fuel plants once RGGI is implemented, and to ensure that EJ communities are not subject to increased pollution as industry adjusts to RGGI.

2. The revenue generated through RGGI should not be placed in the state's general fund nor used to service the public debt or other investments unrelated to environmental repair and justice. An appropriate use of the revenue would be to reduce demand for power by improving infrastructure and insulation especially in rural and urban EJ communities. Another appropriate use would be to encourage new jobs in sustainable energy and to help workers in the fossil fuel industry transition to stable, safe jobs in a green economy.

In conclusion, I simply ask that the DEP and EQB align the actions of our state with Amendment 1, section 27 of our state constitution, "The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment." Your decisions are vital to ensuring that future generations will have clean air and environmental justice. Thank you for your time and consideration.

[1] Chan, N. W., & Morrow, J. W. (2019). Unintended consequences of cap-and-trade? Evidence from the Regional Greenhouse Gas Initiative. *Energy Economics*, 80, 411-422.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov