



January 7, 2021

Environmental Quality Board  
Rachel Carson State Office Building, 16th Floor  
400 Market Street  
Harrisburg, PA 17101

### **CO2 Budget Trading Program**

#### **Comments regarding the proposed regulations that would reduce carbon dioxide (CO2) pollution from power plants within Pennsylvania and establish Pennsylvania's participation in the Regional Greenhouse Gas Initiative (RGGI).**

On behalf of the American Lung Association in Pennsylvania, I am writing to express our support for the ongoing advancement of climate policy in Pennsylvania to protect public health. With the regional efforts to combat climate change, Pennsylvania's leadership is critical to protecting public health at home and securing a healthy future.

The American Lung Association's 2020 *State of the Air* report found that eight of Pennsylvania's counties earned a failing grade for ozone pollution, with nearly half of the commonwealth's 67 counties having incomplete or nonexistent data.<sup>1</sup> For more than 1.2 million Pennsylvania children and adults living with asthma, along with over 700,000 living with COPD, the challenges of unhealthy air are all too real.<sup>1</sup> The burdens of unhealthy air fall heaviest on our children, seniors, lower income communities and residents with existing heart and lung disease. These challenges are only compounded by the increasing well-documented and understood public health threats associated with climate change driven by fossil fuels.

Due to a variety of factors, Pennsylvania is specifically vulnerable to the impacts of climate change. As noted in the recent Fourth National Climate Assessment, the Northeast region is vulnerable to increased ozone levels that already impact the state: "In the Northeast, climate change threatens to reverse improvements in air quality that have been achieved over the past couple of decades. For example, climate change is projected to influence future levels of ground-level ozone pollution in the Northeast by altering weather conditions and impacting emissions from human and natural sources."<sup>2</sup> Beyond the respiratory health impacts identified in the assessment, significant risks due to rising seas, flooding and both Nor'easters and hurricanes pose significant risks to public health in the region.

We encourage the Pennsylvania Environmental Quality Board (EQB) to move forward with proposed regulations that would reduce carbon dioxide (CO2) pollution from power plants within Pennsylvania and establish Pennsylvania's participation in the Regional Greenhouse Gas Initiative (RGGI). Tightening the cap on harmful carbon emissions within the overall drive to

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<sup>1</sup> American Lung Association. State of the Air 2020. <https://www.stateoftheair.org/city-rankings/states/pennsylvania/>

<sup>2</sup> US Global Climate Fourth National Assessment. Chapter 18: Northeast. Key Message 4: Threats to Human Health: Health Effects of Air Pollution, Aeroallergens, and Wildfires; Key Message 2: Changing Coastal and Ocean Habitats, Ecosystem Services and Livelihoods. <https://nca2018.globalchange.gov/chapter/18/>



reduce carbon pollution from all sectors is a proactive step that can be reinforced through regional actions underway across the RGGI states.

The proposal to tighten the emissions cap and provide for assurances that the programs will function properly in the coming decade should move forward as planned. We encourage EQB to advance strong programs to reduce carbon emission from the energy sector and to pay particular attention to ensuring emission reduction benefits accrue to communities most impacted by harmful local pollutants and toxic emissions. Investments in energy efficiency and other programs to reduce carbon pollution must continue to achieve pollution benefits for all communities, especially to lower-income residents most vulnerable to existing pollution levels and the impacts of climate change.

Our changing climate demands urgent action to reduce impacts to public health, air quality and our quality of life. The regional efforts to reduce power plant emissions are an important step toward securing critical emission reductions.

Thank you for the opportunity to submit comments.

A handwritten signature in black ink that reads "Molly Pisciotano". The signature is fluid and cursive, with a large loop at the end of the last name.

Molly Pisciotano, MHA  
Director, Advocacy, Pennsylvania & West Virginia  
American Lung Association in Pennsylvania