

8/29/2021

Comments of Sierra Club Pennsylvania Chapter
To the Independent Regulatory Review Commission



**SIERRA
CLUB**



Re: Regulation #7-559: CO2 Budget Trading Program

Members of the IRRRC:

On behalf of our over 31,000 members in Pennsylvania, I urge you to approve the CO2 Budget Trading Program, which will place the first ever limits on CO2 pollution from Pennsylvania power plants and allow the Commonwealth to link to the Regional Greenhouse Gas Initiative. This would be the most important action Pennsylvania has taken to date to help mitigate the effects of climate disruption, which is the foremost concern of our Chapter. The window of time for us to address this crisis is rapidly closing - climate scientists warn that we must reduce global greenhouse gas emissions (GHGs) by 50% by 2030, and eliminate them entirely by 2050 in order to avoid catastrophic global warming.

Obviously, this regulation alone will not solve the climate crisis. In fact, if Pennsylvania eliminated all its GHGs tomorrow, that alone would not solve it. That fact does not absolve us from doing our part. RGGI and other state-level policies do not happen in a vacuum, and it is the sum total of all actions that will solve this crisis. Indeed, every state and every nation must do its part, which is what the Paris Accord is all about. It is notable, though, that Pennsylvania emits more annual GHGs than 172 of the 194 nations that signed on the Paris Accord, so our action is critical.

If we do not successfully address the threat of climate change, Pennsylvania will experience:

- More frequent, more intense heat waves that make this summer seem moderate by comparison;
- More air pollution from ozone and wildfire smoke, which are related to temperature;
- More extreme storms, meaning power outages, property damage from wind and trees, flash flooding, washouts and landslides, hail and tornado damage;
- Extreme temperature fluctuations in the winter as well - a polar vortex used to be rare, but now is common because of a weakened jet stream;
- Agricultural losses from droughts, flooding, heat extremes harming livestock, and less predictable spring weather that threatens orchards;
- Tidal flooding of the Delaware River will make parts of Philadelphia and Delaware counties uninhabitable.

Most of these impacts are already happening and the best we can do now is limit the damage. If we do nothing and allow runaway climate change, it will threaten our entire economic and social system. One of the criteria for determining whether a regulation is in the public interest is the

protection of public health, safety, and welfare. Runaway climate change is a grave threat to each.

Because we have already waited so long, reducing GHGs as rapidly as we need to will require major changes in every economic sector. RGGI is one of the least costly, least intrusive methods available to do so, which is another key criterion for the IRRC. However, we could choose not to act, and instead hope that other states and nations cut their CO2 and other GHG pollution fast enough to avoid the worst impacts of climate change. If they succeed in saving us, they will have an insurmountable economic advantage due to their earlier investment in the clean energy technology and infrastructure that we failed to make. This would have a severe economic and fiscal impact on the public and private sectors for years to come.

Approval of this regulation today is a critical first step to ensuring Pennsylvania does its part to maintain a livable climate. We hope you will do the right thing.

Respectfully,

A handwritten signature in black ink, appearing to read 'T Schuster', with a long horizontal flourish extending to the right.

Thomas Schuster
Clean Energy Program Director
Sierra Club, Pennsylvania Chapter