

My name is Steve Todd. For my testimony before this listening session, I will refer to my blog, comparing DEP's and my Pittsburgh testimonies I've posted here:

<http://steventodd.wordpress.com/2014/08/03/how-far-far-apart-we-the-people-of-pa-are-on-climate/>

How far, far apart We The People of PA are on Climate

Posted on August 3, 2014 by [steventodd](#)

On July 31, The Environmental Protection Agency (EPA) held a hearing on proposed limits for carbon pollution from existing power plants. The EPA's proposed Clean Power Plan would cut carbon emissions by up to 30 percent by 2030. Pittsburgh Business Times reports that "EPA officials said they had already received 300,000 comments before the start of the hearing."

There is no greater example of how far, far apart We The People are on this issue than a comparison of my own Commonwealth's regulatory agency's position and my own.

I have read DEP Deputy Secretary Vincent Brisini's EPA Testimony:

[Vince Brisini's EPA Testimony](#)

I also offered my testimony at that hearing, as a professional civil/environmental engineer. Brisini's is a little different than mine was:

[Steve Todd's EPA Testimony](#)

It is staggering that Deputy Brisini offers little argument against the soundness of the environmental protection aspects of EPA's new standards. He makes largely political, legal and economic arguments. While those need heard, it is unnerving that DEP chooses to use its

testimony to make them primarily. Brisini never claims EPA standards won't protect our air, dirt and water. Only that it might not respect our state's power, or cost certain industries to do so. This tendency – of our DEP making economic arguments over, and often in complete absence of, environmental protection issues is so typical of late that it is becoming embarrassing to PA.

The third full paragraph, begins with "Pennsylvania questions EPA's authority to..." As a citizen of PA with every bit as much sovereignty (no more, but no less) than Brisini, I submit that his opening should read "PaDEP questions EPA's authority to...", or perhaps "The current Administration questions EPA's authority to..." PA citizens do not, by and large question EPA's authority. ~~We tend to know that EPA delegates regulatory authority to DEP, and that EPA can indeed rescind that delegation.~~ (not read)

In that paragraph, Brisini declares the new EPA standards will "establish programs that are more related to achieving desired social and economic outcomes rather than developing and implementing performance standards to achieve emission reductions from existing units." This is unbelievably arrogant, doubly so from a person in a position that should know better. While the standard may affect socio-economic outcomes, its sole intention is to reduce emissions. If we could burn coal without the tremendous harm it produces, I would never oppose it. I doubt many would, and further doubt that EPA would either.

This reversed logic continues. Brisini testifies that EPA is moving to "establishment of an overarching energy policy that picks winners and losers in the marketplace...in a manner that manipulates the free market..." Unless those profiting are to begin funding the 24/7 global military presence, manipulating the market is the only thing that keep fossil fuels even viable as an energy source. We have forever picked fossil fuels as the winner, but only at tremendous cost to each person. And now, at tremendous and almost certainly catastrophic, cost to Earth.

Brisini's call for "the need for EPA to recognize state leadership and authority to regulate pollutants within their borders," is a terrible idea for all citizens of Earth. Only governments, and humans when made to, recognize borders of human creation. Pollution can not and does not. States must only be free to self-regulate inasmuch as it is effective in keeping all pollution inside said artificial borders. This is, of course, not possible.

He again wrongly identifies the Commonwealth of PA as the entity which "does not believe that environmental agencies should regulate or influence energy markets." I submit, again, that it is the Corbett Administration's DEP who does not believe this. PA people who eat, breathe and drink here most certainly DO believe that environmental agencies should regulate energy markets. I hope that we also believe our DEP executives should hold similar beliefs, and believe many of us find it surprising that at least this one does not.

What is our recourse, when those paid of, by and for us to protect our environment drive 3 hours each way to testify about state/federal jurisdictions and economic impact?


Steve Todd, PE, LEED AP
Executive Director, **Todd Engineering, LLC**
629 Bullfrog Valley Road
Hummelstown, PA 17036-9743
home 717.534.0695
cell 717.571.9634
steventodd@hotmail.com
<http://steventodd.wordpress.com>