

By E-Mail

August 17, 2020

The Honorable Meg Snead
Secretary of Policy and Planning
Office of the Governor
238 Main Capitol Building
Harrisburg, PA 17120

The Honorable Patrick McDonnell
Secretary of Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Dear Secretary Snead and Secretary McDonnell,

We are writing to convey recommendations from the Environmental Justice Advisory Board. The Environmental Justice Advisory board supports the RGGI program for the Commonwealth of Pennsylvania. We offer some recommendations to encourage meaningful consultation with Pennsylvania environmental justice communities, to safeguard environmental justice, and to pre-empt potential environmental injustices with RGGI implementation. The below represent the unanimous recommendations of the Environmental Justice Advisory Board.

We recommend the following:

- Create an inter-agency group to coordinate RGGI.
- Dedicate a budget for RGGI administration.
- Prior to implementation, design the RGGI program to monitor impacts of RGGI to EJ communities to allow adjustments to the program to increase benefits and minimize negative impacts of program implementation to EJ communities.
- Establish mandatory carbon dioxide reduction targets in EJ communities.
- Include any findings of impacts to EJ communities in regular RGGI reporting.
- Include formal participation by Environmental Justice communities in RGGI planning and implementation processes, including outreach to the DEP's EJ Stakeholders group.
- Dedicate a portion of the RGGI revenue (exact percentage TBD) to EJ communities using a framework and criteria designed based on feedback from EJ stakeholders and residents.
- Request the DEP to identify policies and programs outside of RGGI to further reduce air pollution and improve public health outside, especially in places that have high pollution burdens.
- Dedicate a portion of the RGGI revenue (exact percentage TBD) to renewable energy initiatives (in addition to environmental justice funding and not including waste coal¹).

¹ Pennsylvania is the only state to allow waste coal to count as a 'renewable energy' source as part of the commonwealth's renewable portfolio standard (Pennsylvania Act 213 of 2004) (see supplementary diagram attached in a separate file). Given the flammability and air pollution associated with waste coal in Pennsylvania (The Associated Press 2014), we recommend that your administration consider removing waste coal from Pennsylvania's renewable energy eligible list.

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Thank you for your continued work on RGGI and for your review of our recommendations.

Respectfully,

A handwritten signature in blue ink, appearing to read "Adam H. Cutler". The signature is fluid and cursive, with a long horizontal stroke at the end.

Adam H. Cutler, Chair
Environmental Justice Advisory Board