American Lung Association.
Virginia

Mr. Mike Dowd
Director, Air & Renewable Energy
Virginia Department of Environmental Quality
1111 E. Main Street, Suite 1400
Richmond, VA 23219

RE: 9VAC5-140, Regulation for Emissions Trading

Dear Mr. Dowd:

The American Lung Association in Virginia strongly opposes the efforts to repeal the regulation implementing Virginia's participation in the Regional Greenhouse Gas Initiative (RGGI). The Lung Association believes that Virginia must continue is participation in RGGI to make meaningful reductions in greenhouse gas emissions that would protect the health and well-being of Virginians.

The American Lung Association is the leading organization working to save lives by improving lung health and preventing lung disease, through research, education and advocacy. The work of the American Lung Association is focused on four strategic imperatives: to defeat lung cancer; to improve the air we breathe; to reduce the burden of lung disease on individuals and their families; and to eliminate tobacco use and tobacco-related diseases.

The American Lung Association's 2022 State of the Air[1] report revealed that four in ten Americans, more than 137 million people live in counties that had unhealthy levels of ozone and/or particle pollution. In Virginia there were mixed results. Some of Virginia's metro areas were named the top places to live while others had much worse results. Ozone and particle pollution can harm the health of all Virginia's residents and of particular risk are children, older adults, pregnant people and those living with chronic diseases – approximately 140,000 children and 580,000 adults are living with asthma in Virginia. Both ozone and particle pollution can cause premature death and other serious health effects such as asthma attacks, cardiovascular damage, and developmental and reproductive harm.

Climate change is one of the most urgent threats to human health of the 21st century. Reduction of harmful pollutants caused by burning fossil fuels and other combustion is critical to improving the local health today and ensuring a stable climate for future generations. Climate change is first and foremost a public health issue and one that creates disproportionate impacts across Virginia's diverse communities. Further, climate change is making the job of cleaning our air much more difficult as temperatures rise and drive conditions for unhealth ozone pollution days, among other health challenges.

The American Lung Association supports measures to reduce all emissions that contribute to climate change. Such measure should include but are not limited to transitioning away from fossil fuels to increased use of clean, non-combustion, renewable energy sources and zero-emission transportation technologies, expanding energy conservation and efficiency measures and establishing enforceable and science-based limits on emissions for all sectors including industrial, energy, commercial, residential and transportation. We support measures to reduce other outdoor air pollutants while reducing emissions that cause climate change.

The American Lung Association recently issued our Zeroing In on Healthy Air[2] report which finds that a widespread transition to zero-emission vehicles powered by clean energy sources could result in up to 110,000 avoidable deaths and $1.2 trillion in public health benefits across the United States over the next 30 years. In Virginia specifically, the report found that transition to clean energy transportation could have $29.7 billion in public health benefits including 2,700 avoided deaths, 70,900 avoided asthma attacks and 350,000 avoided lost workdays. Achieving these public health benefits requires strong policies and investments at the local, state, and national levels to spur the transition to zero-emission vehicles and non-combustion, electricity generation. The transition to zero-emission technologies would benefit residents across the United States and in Virginia and especially those most burdened by power plants and transportation hubs like highways, ports, and warehouses.

In 2020, Virginia became the first southern state to join RGGI. RGGI is a collaborative effort among states in the Eastern part of the country to reduce carbon dioxide (CO2) emissions from power plants in each participating state. The participating states include Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. Together these states have established a regional cap on CO2 emissions, essentially setting a limit on the emissions from regulated power plants in the given states. Over time these caps will decline and so will CO2 and other harmful emissions.[3] For example, a July 2020 study published in the journal Environmental Health Perspectives concluded, based on particle pollution reductions, "RGGI has provided considerable child health benefits to participating and neighboring states beyond those conventionally considered. Moreover, those health benefits are estimated to have significant economic value."[4]

Participation in RGGI it allows for CO2 emission to decline in a planned and predictable way to protect health and safeguard our children's future. Since RGGI started emissions have already reduced more than 50%. Through the auction process, it allows funds to be raised to be reinvested into local communities.[3] When the Virginia General Assembly passed legislation authorizing participation in RGGI it also outlined initiatives where the revenues should be invested. Those include 50% for low-income energy efficiency programs, 45% for a new Community Flood Preparedness Fund due to recurrent flooding and rising sea levels, 3% for the Department of Environmental Quality to oversee Virginia's participation in RGGI and implement statewide planning around climate change initiatives.[5]

The American Lung Association believes that all people are entitled to breathe healthy air and to be free of the adverse health effects of air pollution. We support the protection of all people from the harm of air pollution, especially those who suffer disproportionate exposure from local sources of emissions. We recognize that major sources of air pollution are often located near where many people especially communities of color or lower income, live and work which means their exposure to pollutants emitted can be more immediate and disproportionally harmful.

The Lung Association strongly opposes efforts to repeal Virginia's participation in RGGI and encourages Virginia to continue the commitment to fight climate change and remain actively participating in RGGI.

We thank you for the opportunity to provide comments and if you need any additional information, please do not hesitate to contact me at aleks.casper@lung.org or 202-719-2810.

Sincerely,

Aleks Casper

Aleks Casper
Director of Advocacy

[1] American Lung Association. State of the Air Report, 2022. Available at: https://www.lung.org/research/sota

[2] American Lung Association. Zeroing in on Healthy Air, 2022. Available at: https://www.lung.org/clean-air/electric-vehicle-report#

[3] The Regional Greenhouse Gas Initiative 101 Fact Sheet. September 2021. https://www.rggi.org/sites/default/files/Uploads/Fact%20Sheets/RGGI_101_Factsheet.pdf

[4] Frederica Perera, David Cooley, Alique Berberian, David Mills, and Patrick Kinney. Co-Benefits to Children's Health of the U.S. Regional Greenhouse Gas Initiative. Environmental Health Perspectives 128:7 CID: 077006 https://doi.org/10.1289/EHP6706. See also, ABT Associates. Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative, 2009–2014. 2017. https://www.abtassociates.com/insights/publications/report/analysis-of-the-public-health-impacts-of-the-regional-greenhouse-gas-0

[5] Virginia Mercury. March 17, 2021. *Virginia has $43 million in carbon market revenues. How is it going to spend it?* https://www.virginiamercury.com/2021/03/17/virginia-has-43-million-in-carbon-market-revenues-how-is-it-going-to-spend-it/