



# Public comment re: Notice of Intent for Regulatory Action to Repeal CO2 Budget Trading Program

1 message

Anne Katherman <annelizkat@everyactioncustom.com> Reply-To: annelizkat@yahoo.com To: karen.sabasteanski@deq.virginia.gov Wed, Sep 28, 2022 at 8:02 PM

Dear Policy Analyst Karen Sabasteankski,

Thank you for the opportunity to voice my strong opposition to this Administration's plans to take Virginia out of the Regional Greenhouse Gas Initiative (RGGI).

In a time of increasing extreme weather and climate impacts, and rising energy costs, RGGI is bringing hundreds of millions of dollars to our state every year to do two things: 1) help impacted localities address flooding and sea level rise; and 2) fund energy efficiency improvements for low-income households in Virginia - efforts that reduce their energy burden. An estimated 60 percent of total proceeds help either low-income individuals directly, or low-income communities. Since January of 2021, RGGI has generated upwards of \$378 million for these efforts, with proceeds continuing to come in every quarter.

With no "Plan B" to make up this revenue, this action would leave localities without a funding stream to adapt to climate change and protect their communities, while also leaving low-income Virginians behind.

Likewise, taking Virginia out of RGGI undermines our ability to cut harmful pollution from power plants; dirty air threatens us all, and RGGI is helping drive down pollution, leading to positive health outcomes.

This misguided repeal also imperils our economy. We are one of the fastest growing states for clean energy jobs because of strong policies like our membership in RGGI, and we must stay the course to advance the clean energy transition already underway.

Lastly, despite all the clear benefits of staying in this program, it's pretty obvious that Governor Youngkin lacks the authority to take us out of RGGI through the regulatory process - our participation in RGGI is mandated by policies the General Assembly passed in 2020 and only our General Assembly can legally take us back out.

For all the reasons outlined above, I respectfully urge the Administration to cease this repeal process.

Sincerely, Dr. Anne Katherman 121 Wythe Crescent Dr Hampton, VA 23661-3102 annelizkat@yahoo.com



## Comments on VA participation in the Regional Greenhouse Gas Initiative

1 message

Jerilyn Levi <jlevi220@gmail.com> To: "karen.sabasteanski@deq.virginia.gov" <karen.sabasteanski@deq.virginia.gov> Cc: Jerilyn Levi <jlevi220@gmail.com> Wed, Oct 26, 2022 at 9:14 PM

October 26, 2022

Karen G. Sabasteanski, Department of Environmental Quality karen.sabasteanski@deq.virginia.gov.

Please consider my input regarding Virginia's participation in the Regional Greenhouse Gas Initiative. As a 38-year professional of the USDA Forest Service, who was actively involved with the management of public lands both domestically and internationally for carbon sequestration as well as mitigation of greenhouse gases from wildfire emissions, I strongly believe that the future well-being of Virginians depends on the regional cooperation and coordinated action facilitated by <u>Virginia's full participation in RGGI</u>. Here's why.

1) **RGGI is a good investment.** Membership in RGGI has already generated over \$450 million in critical benefits. This regional cap-and-invest initiative has already generated over \$450 million for Virginia during 2021 and 2022. It invests State funds designated by State law: 50 percent for energy efficiency programs for low-income areas, 45 percent to address recurrent flooding, sea level rise and flooding from severe weather events and 5 percent for administration.

2) Energy efficiency upgrades under HB 981 are an effective way to lower utility bills. Especially when they are directed to those in low-income areas most in need. Increases in residential electricity bills amounting to 0.5-1.5 percent is an insignificant expense in exchange for a cost-effective approach to climate change.

3) **RGGI has helped to lower emissions.** The Natural Resources Defense Council has found that Virginia's power plants emitted 13 percent less carbon in 2021 compared to 2020. The Acadia Center's 2019 10-year report on RGGI stated that CO2 emissions from RGGI power plants fell by 47 percent from 2008 to 2018, outpacing emission reductions in the rest of the country by 22 percent. RGGI is a contributing factor, though lower costs for natural gas and renewable energy are additional factors.

4) **RGGI demonstrates cost savings.** Though various factors play a role, RGGI demonstrates energy cost savings, and it has not had negative economic consequences for participating States. According to the Acadia Center's 2019 10-year review of RGGI, between 2008 (the year before the program launched) and 2017, electricity prices in RGGI States fell by 5.7 percent, while prices increased by 8.6 percent in the rest of the country. The Center for Climate and Energy Solutions found a net economic benefit of \$4.7 billion for RGGI States between 2009 and 2017 from the cap-and-trade program.

5) **RGGI balances independent State decision-making with overall system performance.** As a compact participant, Virginia has influence on the operation of RGGI, which in turn benefits the State. For example, the General Assembly specified the low-income energy-efficiency program and Virginia Community Flood Preparedness Fund as recipients of auction proceeds in HB 981. The State's Air Pollution Control Board also created its own extensive, independent regulations (9VAC5-140) based on the RGGI Model Rule framework enabling Virginia to participate in regional CO2 allowance auctions. This framework identifies standards for allowance auctions, the Allowance Tracking System and the eligibility of offset credits. These are reasonable tradeoffs in a cooperative trading system that also provides great flexibility and self-determination to the State. RGGI States continue to evaluate and improve this cooperative program and are conducting their third program review, which began in 2021 and which is expected to conclude in December 2023.

A significant number of the General Assembly (61 members) state that Virginia can only be removed from RGGI by another law passed by the General Assembly and signed by the Governor, <u>not by a proposed regulation, emergency</u> <u>regulation, regulatory act or any subsequent administrative process</u>. Do not withdraw from the Regional Greenhouse Gas Initiative (RGGI). The future well-being of Virginians depends on regional cooperation and coordinated action. *The most* viable and least intrusive alternative to Governor Youngkin's proposed repeal is to continue Virginia's full participation in RGGI.

Thank you very much for your time and prompt attention to this matter.

Sincerely, Jerilyn Levi 1700 D Clarendon Blvd, Apt D-148 Arlington, VA 22209 Jlevi220@gmail.com

Comments on Regional Greenhouse Gas Initiative LEVI 10 26 2022.pdf 191K



## Stay in RGGI

1 message

Natalie Pien <natcpien1@gmail.com> To: karen.sabasteanski@deq.virginia.gov Wed, Oct 26, 2022 at 11:34 AM

Hello, Ms. Sabasteanski,

My name is Natalie Pien, a climate activist from Leesburg, VA. I do not support taking Virginia out of the Regional Greenhouse Gas Initiative that Virginia joined by law in 2020. The Governor's attempts to withdraw VA from RGGI is misguided. Only lawmakers can remove VA from RGGI.

While I do not live in communities directly benefiting from RGGI, I have family that live in Tidewater that have already felt the impacts of more intense and frequent storms caused by climate change. My husband drove from NoVA to his dad's home in Suffolk to bring a generator after an intense storm that knocked out power. We also vacation in coastal VA and need to be able to reach it. Plus, we value its natural resources that need to be protected from climate change. So, I am indirectly impacted.

I have 2 adult children and 2 grandchildren. In addition, I am a retired public-school teacher who taught over 1000 middle schoolers Science. My children and students have been prepared to be successful adults and they deserve a world in which they can thrive and realize his/her full potential. They do not deserve climate change and a struggle to survive in the future. RGGI reduces climate changing greenhouse gas emissions.

As a climate change activist, I work towards a rapid transition from fossil fuels to clean, renewable sources of energy that do not emit greenhouse gases (with the exceptions of nuclear and renewable natural gas). Prior to joining RGGI, Virginia's GHG emissions did not decrease. However, after joining RGGI a decrease in emissions was achieved when the program began.

RGGI is critical to VA achieving the emissions reduction required by the Virginia Clean Economy Act.

RGGI has brought in record funds from the past 3 auction events, more than \$378 million to Va. This funding is helping Virginians today to weatherize their homes, improve energy efficiency, and develop community plans to address flooding.

RGGI creates jobs, economic growth, and improves health.

Virginia must stay in RGGI for Virginians today and tomorrow.

Thank you. Natalie Pien 20644 Gleedsville Rd Leesburg, VA 20175 703 963 3573



# Repeal of CO2 Budget Trading Program

1 message

Carolyn McDowell <carolynmcdowell45@gmail.com> To: karen.sabasteanski@deq.virginia.gov Fri, Oct 21, 2022 at 8:02 AM

Dear Ms Sabasteanski:

I am alarmed to learn of a request to repeal this program! When we are being made aware daily of the scientific evidence warning of the affects of pollution and climate change, the governor's plan is quite worrisome. I strongly oppose this initiative!

With concern, Carolyn McDowell 227 Fodderstack Road Washington, VA 22747

Sent from my iPad



#### **RGGI** 1 message

Tucker, Herbert (ht2t) <ht2t@virginia.edu> To: "karen.sabasteanski@deq.virginia.gov" <karen.sabasteanski@deq.virginia.gov> Tue, Oct 18, 2022 at 8:25 PM

Thanks for receiving comments from the public. It is very hard to understand on rational grounds why the Commonwealth should withdraw from the RGGI. Getting a variety of stakeholders to agree on a well planned joint effort to control pollution and improve the dwindling prospects for a healthy environment is not easy. Virginia should not become a spoiler at this point. Common-wealth is not compatible with individual profiteering of the sort the current Richmond administration seems bent upon promoting. Stick with RGGI.

Herbert Tucker

Charlottesville



### Support RGGI

1 message

Dave Redding <hfcusa.org@gmail.com> To: karen.sabasteanski@deq.virginia.gov Tue, Oct 18, 2022 at 8:24 PM

We need VA to support RGGI

PLEASE

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David Redding Ecovillage Charlottesville (ecovillagecharlottesville.org) EcoVillage Education Institute (ecoeduc.org) Healthy Food Coalition (http://hfcusa.org) 480 Rio Rd E Charlottesville, Va 22901 PH# 434 826 9505 hfcusa.org@gmail.com



## **RGGI-Do NOT leave the program!**

1 message

Betsy Stires <betsy@froghilldesigns.com> To: karen.sabasteanski@deq.virginia.gov

Fri, Oct 14, 2022 at 1:50 PM

1. 21 - 22 - 200

My husband and I do NOT want Virginia removed from the RGGI initiative.

WE strongly disagree with Gov. Youngkins position.

400 Madison Street No. 501 Alexandria, VA 22314



### **RGGI - Gov Younkin**

1 message

Fernando Villagran <fvillagran79@gmail.com> To: karen.sabasteanski@deq.virginia.gov Fri, Oct 7, 2022 at 1:14 PM

Esteemed Ms. Sabasteanski,

Given that we are now in an undeniable new era of unpredictable weather patterns and the recent catastrophe in Florida (and seemingly everywhere else for that matter) it seems to me Gov. Younkin's decision is misguided.

Whoever his advisors are need to bone up on basic science. The myopic allure of short term economic concerns are instantly wiped out when Mother Nature turns her gaze upon us. We ignore the warning signs at our own peril. I strongly urge the Governor to reconsider. The stakes are too high to play by the old rule book. Thank you for your kind attention.

Sincerely,

Sent from my iPhone Fernando Villagran, MBA,GRI 202-468-6957



#### **RGGI** Concern

1 message

**Dorothy Carney** <dorothy.carney@gmail.com> To: karen.sabasteanski@deq.virginia.gov Fri, Oct 7, 2022 at 9:13 AM

Virginia should continue to be a part of the Regional Greenhouse Gas Initiative (RGGI).

As a resident of Charlottesville and as a voter, and as a conservationist, I strongly support the RGGI.

And as a civic matter of law, the RGGI is a legislative issue which should not be at the political whim of the governor.

Please protect the RGGI, Dorothy Carney 608 Rainier Rd Charlottesville, VA 22903



### Proposal to remove Virginia from RGGI

1 message

ajcdk77@gmail.com <ajcdk77@gmail.com> To: "karen.sabasteanski@deq.virginia.gov" <karen.sabasteanski@deq.virginia.gov> Mon, Oct 3, 2022 at 4:29 PM

Dear Ms. Sabasteanski,

The Youngkin administration announced its intention to withdraw from the Regional Greenhouse Gas Initiative (RGGI) via regulatory action at the August 31, 2022 Air Control Board meeting. I am writing to urge the Board to reject that proposal.

A September 8, 2022, letter from 61 legislators states "that Virginia's participation in RGGI is mandated by law. Therefore, only a change in the law that passes both chambers of the General Assembly and is signed by the Governor can remove Virginia's participation." Proposed legislation considered in the last legislative session would have removed Virginia from RGGI; this was rejected. The Governor should not be permitted to accomplish indirectly what is essentially a legislative change without the approval of the General Assembly. The Air Pollution Control Board should, therefore, reject this proposal because to do otherwise would violate Virginia law.

The Air Pollution Control Board should also reject this proposal because RGGI is working. RGGI is bringing economic, health, and energy efficiency benefits to participating states. Virginians are already benefitting from over \$300 million in RGGI-generated funds that are supporting flood resilience and energy efforts.

The program is driving down emissions, improving public health, and providing critical funding to address flood preparedness – a critical risk to Virginia's infrastructure. The impact of weather events is significant and escalating. The effects of unaddressed flood preparedness are evident right now. See the reporting attached below on the impact of Hurricane Ian on coastal Virginia communities. Schools close, cities prepare for potential major tidal flooding Monday | WAVY.com

Removing Virginia from RGGI is a bad deal for Virginians. The Air Pollution Control Board should, therefore, reject this illegal and unwise proposal.

Sincerely,

**Carol Doran Klein** 

1369 Kirby Road

McLean, Virginia 22101

703-883-9514

Sent from Mail for Windows