



MEMBER JURISDICTIONS

October 20, 2022

CHESAPEAKE

Ms. Karen G. Sabasteanski
Virginia Department of Environmental Quality

FRANKLIN

P.O. Box 1105
Richmond, VA 23218
karen.sabasteanski@deq.virginia.gov

GLOUCESTER

RE: NOIRA, Repeal CO₂ Budget Trading Program as required by Executive Order 9 (Revision A22)

HAMPTON

Dear Ms. Sabasteanski,

ISLE OF WIGHT

On behalf of the Hampton Roads Planning District Commission's board and seventeen member jurisdictions, I write to you to oppose the Administration's proposed actions to remove Virginia from the Regional Greenhouse Gas Initiative (RGGI).

JAMES CITY

NEWPORT NEWS

NORFOLK

The HRPDC appreciates the Administration's concern regarding the increase in energy costs, part of which are due to the Commonwealth's participation in RGGI. We recognize that any increase in energy costs places significant burdens on Virginia's residents and businesses. Securing more affordable energy will help Virginia remain economically competitive and protect our quality of life. However, we also believe that energy costs cannot be the only factor in reconsidering whether the Commonwealth's participation in RGGI continues. Crucially, the Notice of Intended Regulatory Action (NOIRA) does not consider that Virginia's proceeds from RGGI auctions fund both the Housing Innovations in Energy Efficiency program and the Community Flood Preparedness Fund (CFPF). RGGI auctions have provided nearly \$430 million to these programs since March 2021, funding that would not have been possible without Virginia's participation in RGGI.

POQUOSON

PORTSMOUTH

SMITHFIELD

SOUTHAMPTON

SUFFOLK

The Hampton Roads region is significantly vulnerable to both current and future flooding. The CFPF is the only significant source of state funding for local resiliency initiatives and projects. Having a reliable, ongoing, and adequate funding source is critical for the Commonwealth to address resiliency and flooding issues. Until an alternative source of revenue for the CFPF has been identified, any decision to remove the Commonwealth from RGGI will be premature. The HRPDC therefore opposes the proposed regulatory action.

SURRY

VIRGINIA BEACH

WILLIAMSBURG

YORK

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We appreciate the opportunity to provide comments on this NOIRA. We encourage the Administration to consider Virginia's participation in RGGI in the broader context of resiliency and energy efficiency goals. We would welcome the opportunity to discuss these issues in greater depth.

Sincerely,

A handwritten signature in black ink, appearing to read "Andria P. McClellan". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Andria P. McClellan
Chair