

January 21, 2022

Air Pollution Control Board  
c/o Office of Regulatory Affairs  
Department of Environmental Quality  
P.O. Box 1105  
Richmond, Virginia 23218

Email: [CitizenBoards@DEQ.Virginia.gov](mailto:CitizenBoards@DEQ.Virginia.gov)

**Subject:** Comments by the Northern Virginia Regional Commission Concerning the Proposed Withdrawal from the Regional Greenhouse Gas Initiative

Dear Virginia Air Pollution Control Board,

The Northern Virginia Regional Commission (NVRC) respectfully submits its comments concerning the proposed withdrawal by the Commonwealth of Virginia from the Regional Greenhouse Gas Initiative (RGGI).

Specifically, the NVRC strongly **encourages that the Commonwealth maintain its participation in the RGGI program.**

The NVRC advocates this position because of the pivotal role and benefits to Northern Virginia and the rest of the Commonwealth from RGGI funding and programing. RGGI funds and programs have helped make Northern Virginia climate resilient, socially equitable and economically sustainable.

As you know, the 2020 law gave DEQ the authority it had lacked previously—to sell allowances directly into the quarterly RGGI auctions and raise revenue for Virginia. But it also requires DEQ to use that new authority, mandating that DEQ “shall seek to sell 100 percent of allowances” in a trading program consistent with RGGI. Thus, Virginia’s participation in RGGI is required by the statute. Therefore, any effort to withdraw the Commonwealth of Virginia from the RGGI program must be approved by the General Assembly. This position was acknowledged by an [Attorney General’s Opinion](#) dated January 11, 2022.

*Context:*

Since 2020, and the approval for the Virginia Clean Energy and Community Preparedness Act, participation by the Commonwealth in RGGI has led to the establishment of two important funding sources:

- 1) The Virginia Community Flood Preparedness Fund (CFPF); and,
- 2) The Housing Innovations in Energy Efficiency (HIEE) programs.

These two programs have been provided vital – and at times the only - financial support to help financially-pressed local governments protect marginalized and low-income communities from economic hardship, health threats and environmental degradation. These funds also promote proactive climate resilient planning that supports public, ecologic and commercial health, rather than costly reactive and unplanned remediation. Local governments in Northern Virginia have used and will continue to use these funds to support resiliency planning that aids the operations of our region’s hospitals, energy and water infrastructure, schools, businesses, and residences.

Withdrawing Virginia from RGGI would seriously limit local governments across the Commonwealth and Northern Virginia a vital financial mechanism that cannot be replaced.

For example, in Northern Virginia, RGGI funds from CFPF will support these critical resiliency planning activities in 2022:

- \$3,241,200 (City of Alexandria) - Waterfront Improvement Project Design
- \$516,500 (City of Alexandria) - Arlandria Flood Mitigation – Edison Street and Dale Street Capacity Project Phase I;
- \$11,250 (Northern Virginia Regional Commission) – Flood Prevention and Protection Study; Northern Virginia Rain Gauge Network Evaluation.<sup>1</sup>

The Alexandria waterfront is already highly vulnerable to the dual threats of flooding from storm events and sea level rise. Funds from the CFPF will help the City and region prevent loss of property, infrastructure, and economic stress. NVRC’s [sea level rise](#) map and analysis points to the current threats from flooding. It is estimated that a rise in the water levels of the Potomac River between 3 and 5 feet would impact property values of parcels along Alexandria’s waterfront between the northern boundary of Jones Point Park and Oronoco Park between \$35 million and \$100 million. <sup>2</sup>

The ties between Alexandria’s flood protection efforts, affordable housing planning and support from CFPF can also be seen in NVRC’s [Social and Housing Vulnerable Populations](#) interactive mapping tool.<sup>3</sup> This tool together with information on flood prone areas helps local governments determine the convergence of marginalized communities and flooding issues. The map and its associated information indicate that the Arlandria flood mitigation project not only supports flood mitigation, but it also is supporting a socially vulnerable community in need of housing support. Arlandria has one of Northern Virginia’s largest concentrations of socially vulnerable populations. Arlandria is a majority-minority community with approximately 51.5% of renter households over-burdened by housing costs. Flood mitigation planning like that supported by RGGI and the CFPF, give the City greater opportunities to protect the low-income families of Arlandria from the threats of flooding.

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<sup>1</sup> <https://vcnva.org/cfpf-projects-virginia/>

<sup>2</sup> <https://www.arcgis.com/apps/op dashboard/index.html#/43b6ba6a06994711b8da848f31eb18d1>

<sup>3</sup> <https://nvrc.maps.arcgis.com/apps/instant/minimalist/index.html?appid=1adf0f13298646c6abbabd227ab9dc4a>

Despite its affluence, Northern Virginia has sizeable pockets of economic despair and concentrations of low-income households vulnerable to high energy costs and the cold. NVRC has analyzed the number of households earning below 50% of Area Median Income (AMI) using a combination of U.S. Census Bureau data and the 2021 HUD AMI. It is estimated that there are over 170,000 households below this threshold. Since July 2021, RGGI on a statewide basis has invested \$27.8 million in funds to help [2335 families residing in affordable housing projects](#). It is estimated that some of these families have incomes as low as 40% of area median income.

RGGI funds via HIEE programmed for 2021-2022 also will help low-income households in Northern Virginia receive critical weatherization services. Specifically:

- \$1.2 million for 80 housing units in Fairfax County; and
- \$2.0 million for 163 housing units in Arlington County<sup>4</sup>

*Looking Ahead:*

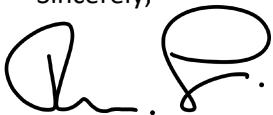
Currently, RGGI provides long-term, institutional, and reliable funding across the Commonwealth. As the stressors from climate change escalate, reliance on RGGI-funded programs will rise, especially in the face of science-based projections from the Mid-Atlantic Science and Regional Assessments (MARISA) such as:

- Winter precipitation increases by 1.3 inches in localities such as Fairfax County by the end of the century; or
- Northern Virginia is projected to see increases in the number of days with nighttime low temperatures above 70 degrees Fahrenheit from an average of eight days to 53 by the end of 2100.<sup>5</sup>

It is worth also pointing out that the Commonwealth of Virginia was the first Southern state to participate in the Regional Greenhouse Gas Initiative and that RGI-funded programs have helped the Commonwealth reduce carbon emissions, create a more stable business environment, protect the state's infrastructure and improve public health at unprecedented rates. The NVRC believes that it would be unfortunate to slow or even halt this progress.

Thank you for considering our requests and comments.

Sincerely,



Robert W. Lazaro, Jr.  
Executive Director

cc: Honorable Members of the Northern Virginia Regional Commission  
Honorable Members of the House and Senate Delegations from Northern Virginia

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<sup>4</sup> <https://dhcd.virginia.gov/governor-northam-announces-over-21-million-affordable-and-special-needs-housing-loans>

<sup>5</sup> [https://experience.arcgis.com/experience/d8319e3a2b5c42efa9dd241ddc0a0932/page/page\\_1/](https://experience.arcgis.com/experience/d8319e3a2b5c42efa9dd241ddc0a0932/page/page_1/)