



Beatrice (Bea) LaPisto-Kirtley
Rivanna

Donna P. Price
Scottsville

Ann H. Mallek
White Hall

COUNTY OF ALBEMARLE
Office of Board of Supervisors
401 McIntire Road
Charlottesville, Virginia 22902-4596
(434) 296-5843

Diantha H. McKeel
Jack Jouett

Jim H. Andrews
Samuel Miller

Ned L. Gallaway
Rio

March 22, 2023

Mr. James P. Guy II, Chair, Air Pollution Control Board
Office of Regulatory Affairs
Department of Environmental Quality
P.O. Box 1105
Richmond, Virginia 23218

Re: Continue Virginia's Membership in the Regional Greenhouse Gas Initiative

Albemarle County urges you to support Virginia's continued participation in the Regional Greenhouse Gas Initiative (RGGI).

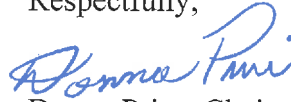
Since its inception, RGGI emissions have reduced by more than 50%, twice as fast as the nation as a whole, and the Initiative has so far raised nearly \$6 billion to invest into local communities.¹ RGGI has proven to be effective by incentivizing the lowest cost means of reducing carbon pollution from power plants. Although there may be a variety of factors leading to reduced emissions, one peer-reviewed study concluded that RGGI has "induced a substantial reduction in the emissions, all else equal."² In addition, RGGI states have outpaced the rest of the country in terms of economic growth while saving ratepayers money through lower electricity prices than the rest of the country.³ In other words, Virginia's participation in RGGI is a triple win for our state's economy, residents' pocketbooks, and the environment.

RGGI states receive the proceeds from selling RGGI allowances, and each state has discretion over how to best use their proceeds. Most of the proceeds have been invested by states back into their communities, including funding of clean energy programs, energy efficiency, and bill assistance to local businesses and communities. Investments targeting low-income households have increased over time and reached 13% of total proceeds in 2020.⁴ Although RGGI was projected to bring \$75 million per year to the Commonwealth prior to joining,⁵ Virginia has financially benefitted six times that the original projection so far: According to the Virginia Department of Environmental Quality (DEQ), our Commonwealth has received approximately

\$452 million in cumulative proceeds since its first auction in March 2021.⁶ Fifty percent of the proceeds from RGGI go toward helping low-income Virginians to make their homes more energy efficient, 45 percent are used to help communities prepare for severe weather events and related flooding and storms surge, and three percent are used for environmental planning efforts by the Department of Environmental Quality (DEQ).⁷

As leaders in our County, we want to ensure that our residents and all Virginians can enjoy a thriving economy, a clean environment, and healthy communities for many generations. We ask you to support Virginia's continued participation in RGGI.

Respectfully,



Donna Price, Chair
Albemarle County Board of Supervisors

CC:

Albemarle County Board of Supervisors
Jeffrey B. Richardson, County Executive
Steve Rosenberg, County Attorney
Lance Stewart, Albemarle County Director of Facilities and Environmental Services

DP/ckb

¹ RGGI.org, "The Regional Greenhouse Gas Initiative," Updated January 2023,

https://www.rggi.org/sites/default/files/Uploads/Fact%20Sheets/RGGI_101_Factsheet.pdf

² Brian C. Murray, Peter T. Maniloff, & Evan M. Murray, "Why Have Greenhouse Emissions in RGGI States Declined? An Econometric Attribution to Economic, Energy Market and Policy Factors," Working Paper No. 2014-04, Colorado School of Mines. April 2014, <http://econbus-papers.mines.edu/working-papers/wp201404.pdf>

³ Jordan Stutt, "The Regional Greenhouse Gas Initiative: 10 Years in Review," Acadia Center. Updated October 2022, https://acadiacenter.wpeninepowered.com/wp-content/uploads/2019/09/Acadia-Center_RGGI_10-Years-in-Review_2019_101122_update_R2.pdf

⁴ RGGI.org, "The Regional Greenhouse Gas Initiative."

⁵ Elizabeth McGowan, "RGGI works': Virginia advocate on what state stands to gain from carbon cap." *Energy News Network*, December 17, 2018, <https://energynews.us/2018/12/17/rggi-works-virginia-advocate-on-what-state-stands-to-gain-from-carbon-cap/>

⁶ "Carbon Trading," Virginia Department of Environmental Quality, accessed March 20, 2023, <https://www.deq.virginia.gov/air/greenhouse-gases/carbon-trading>

⁷ Preston Steger, "A look at RGGI, a carbon reduction initiative that Youngkin wants Virginia to leave," 13 News Now, January 12, 2022, <https://www.13newsnow.com/article/tech/science/environment/regional-greenhouse-gas-initiative-virginia-youngkin-rggi/291-363ceedb-7c88-4d5b-8b99-cf7ce4b384ea>



Thank You




for submitting my request to our Gov.

not to get us out of RGGI!

It is a good thing to attempt -

I can see my my writing is so shaky -

Eloise Morton



Eloise Morton
5345 Marian Ln Apt 241
Virginia Beach VA 23462

PHONE:
757-572-5-

1472142
1472142

An unlawful repeal is not the way to go

Rand Lines <wkcyj34@gmail.com>

Tue 1/31/2023 1:47 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Dear Ms. Karen Sabasteanski,

Virginia residents are highly invested in our clean energy future. Not only do we need to take action on the very real and present dangers of climate change, but we also need to ensure we all have clean air to breathe. The actions we take at this moment will determine the quality of life for generations to come, and RGGI is a vital part of Virginia's future.

RGGI is a proven solution that is already working for Virginia. It is reducing air pollution in Virginia and there is no reason for the Air Pollution Control Board to abandon its responsibilities, rollback progress, and allow power plants to pollute our air more. And importantly, Virginia's participation in RGGI is not for the Board to decide. The General Assembly made this decision, and only the General Assembly can change it.

Do not repeal RGGI. Virginians want clean energy and clean air, and that's what RGGI is doing for Virginia. Please stop this unauthorized repeal of RGGI.

Thanks,
Rand Lines
403 Hemlock Dr SE
Blacksburg, VA 24060

1 of 1,543

An unlawful repeal is not the way to go

Tod Jones <todjones@comcast.net>

Sat 2/18/2023 9:26 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Dear Ms. Karen Sabasteanski,

Virginia residents are DISGUSTED with the mandates required by RGGI! Please repeal RGGI!

Thanks,

Tod Jones

561 Hawkins St

Harrisonburg, VA 22801

Repealing CO2Trading Program

Barbara Hildenbrand <bgirl4110@gmail.com>

Mon 2/27/2023 11:34 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Yes, please repeal this program. Causes more harm than it solves. Puts Virginia totally out of balance. Please urge the repeal of this program by Virginia legislators.

Barbara Hildenbrand 757-220-8060

Get out if regional energy deal .

Robert Booth <printerbob727@icloud.com>

Tue 3/14/2023 3:35 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

It doesn't work . Support Governor Youngkin and the people of Virginia . Greenhouse gas went up under the regional deal . If democrats support it it must be bad for everyone but the crooked politicians.

Bob Booth

1109Fox Ridge Dr.

Earlysville VA 23936-9565

6308051703

An unlawful repeal is not the way to go

James Mundy <jay.mundy777@gmail.com>

Wed 3/15/2023 8:14 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Dear Ms. Karen Sabasteanski,

Repeal Virginia's membership in the RGGI! All it does is make energy less reliable and more expensive. Get Virginia out of the RGGI!

Thanks,

James Mundy

87 Lone Fountain Ln

Churchville, VA 24421

Comment for: Repeal CO 2 Budget Trading Program as required by Executive Order 9 (Revision A22)

Matt <wolf359str@aol.com>

Sat 3/25/2023 10:11 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Karen G. Sabasteanski,

I am attempting to leave a comment through the Virginia Town Hall system, but I was unable to tell from the page how to do that. Here's the page, which lists you as the primary person:

<https://townhall.virginia.gov/L/ViewStage.cfm?stageid=9879>

I am hoping to leave a comment in support of repealing the regulation. I do not think the regulation provides a benefit to the environment generally, or to the specific situations facing Virginia. While working together with our neighboring states is an important aspect of progress toward a better future, this measure does not accomplish those goals.

Thank you for your time,

Matt Dunlap
Strasburg, VA

Re: I can't fine the pageElaine Lidholm <elainelidholm@gmail.com>

Tue 1/31/2023 1:43 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Thank you for such a quick reply. I'll just comment now: I am opposed to removing VA from the RGGI.

In case you need it:

Elaine J Lidholm

1619 West Laburnum Ave.

Richmond

804.382.7479

On Tue, Jan 31, 2023 at 1:24 PM Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov> wrote:

Hi, Elaine. You can comment by going to this link:

<https://townhall.virginia.gov/L/comments.cfm?stageid=9879>

and clicking on "enter a comment." Or you can email me directly, or send in your comments by regular postal mail—whatever is most convenient for you.

Thanks,

Karen

From: Elaine Lidholm <elainelidholm@gmail.com>

Sent: Tuesday, January 31, 2023 1:17 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Subject: I can't fine the page

On the greenhouse gas initiative website to voice my opposition to removing VA from the RGGI.

Please support RGGI

cathy tignor <cmtignor@yahoo.com>

Tue 1/31/2023 5:33 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Don't let Youngkin screw up our environment, too!

Sent from my iPhone

I am appalled this is even necessary: I oppose Virginia pulling out of the RGGI! Martha Skelton, Midlothian, Va.

Martha Skelton <e-quill@comcast.net>

Wed 2/1/2023 6:59 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Sent from my iPhone

Stay in RGGI

D Moxley <dmoxley@verizon.net>

Wed 2/1/2023 11:24 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

As a VA Master Naturalist, I find it very upsetting and disappointing that there is ANY consideration to undo progress that has been so hard-fought in the past in order to protect the environment.

Please vote against any changes to destroy what we are all trying to do for the benefit of EVERYONE at large.

I agree with an earlier comment I saw on the website to keep RGGI and get rid of Youngkin.

Diane Moxley
804 747-8495

Save the RGGI!

Edward Champion <edchampion007@msn.com>

Thu 2/2/2023 10:46 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Dear Ms. Sabasteanski:

I am against Virginia's exit from the Regional Greenhouse Gas Initiative (RGGI).

Global warming is real, and CO2 emissions make it worse. At a modest cost, RGGI addresses the problem at a modest cost.

[I also want Virginia to continue to join its neighbors to continue work on improving conditions in the Chesapeake Bay.]

Hey, Boomer! Think of what you are passing on to your grandchildren! Not every problem can be addressed with the calculus of dollar net present value.

Edward Champion, Jr.

Executive Order 9 (2022): "Protecting Ratepayers from the Rising Cost of Living Due to the Regional Greenhouse Gas Initiative" requires that the department re-evaluate Virginia's participation in the Regional Greenhouse Gas Initiative (RGGI) and begin regulatory processes to end it.

Sent from [Mail](#) for Windows

Action:Repeal CO 2 Budget Trading Program as required by Executive Order 9 (Revision

...

Leo Watkins <watkinsleo700@gmail.com>

Fri 2/3/2023 8:00 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

I am a Virginia voter. Leo Watkins, Fredericksburg, VA

I am writing to register my strong opposition to the Governor's arbitrary and illegal attempt to repeal Virginia's ongoing participation in RGGI. In addition to my opposition due to the action itself, which is rejecting a market based solution to climate change that was and is working, to the benefit of Virginia and the world by using the tools of an honest and capitalist society to enact change;

I find it extremely arrogant and self serving for him to do so in spite of our participation being due to legislation duly enacted by the General Assembly. We have not have Royal Governors for a very long time. Governor Youngkin would do well to remember that laws apply to him, same as everyone else. If he wished this legislation to be repealed, then he should go to the legislature and request it, same as anyone else.

Furthermore, his arbitrary decision damages the reputation of the state, which entered into a partnership with other states with the full faith and power of the state. For him to whimsically change course for personal gain and without the consent of the legislature damages the full faith and credit of the Commonwealth. How can anyone trust us if one man can come in and not abide by the agreements entered into by the state as a whole? No governor has nor should have such power. Nor should they wield it for such specious and self serving reasons. This is wrong.

He needs to quit listening to Wormtongue Wheeler and worrying about his future election ambitions, and more about what is right for Virginia. Rescind this order and do the people's will for the people's good.

Keep RGGI

Crawford Bob <bcrawfbc@gmail.com>

Sun 2/5/2023 11:33 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Ms. Sabasteanski,

Virginia should continue to employ the RGGI. Rather than dropping the RGGI, the state's action should be to fix any unforeseen loophole in the regulation rather than withdrawing from this important initiative, which is a significant element of Virginia's response to destructive climate change. The costs imposed by climate change will continue to escalate, all the moreso if we avoid taking action now.

Robert Crawford
6620 Shingle Ridge Rd.
Roanoke, VAS 24018

RGGI

Sharon and Dennis <sdshowalt@gmail.com>

Wed 2/8/2023 10:54 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Virginia needs to keep RGGI. It is a positive way to control climate change and provides needed support to the poor for upgrading their energy efficiency. -Dennis Showalter, Harrisonburg

CO2 Budget Trading Program (Part VII of 9VAC5-140) comment

Larry <public@thebalancegroup.com>

Wed 2/8/2023 4:23 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Comment in response to request to repeal CO2 Budget Trading Program (Part VII of 9VAC5-140) .

Please do not remove Virginia from the Regional Greenhouse Gas Initiative (RGGI)
CO2 Budget Trading Program (Part VII of 9VAC5-140)

1. It makes no sense for companies and systems to keep changing back and forth every 4 or 8 years at political whims of one person versus the legislation. Legislative laws should outweigh a desire of one person in the state.
How is this legal?
2. Why go backward on a program scheduled to help large sections of the state and the coastline including military establishments through reduction of rising oceans and nastier storms?
3. Typically pollution has harmed people in lessor income and indigenous peoples. Why do we want to go backward on this program and tell those people they are not important and do not count.
4. Do you really want to be in the middle of a legal dispute. I as a taxpayer in Virginia do not want to spend money on legal defense similar to the ACP fiasco.

Please do not repeal this program passed by the Virginia general assembly.

Thank you,
Larry Korte
109 Pleasant Hill Ln.
Churchville, VA 24421

RGGI

wriffer@cox.net <wriffer@cox.net>

Mon 2/27/2023 3:16 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Cc: Pamila Berg <pberg16@comcast.net>; Lisa Gerchick <lkoteengerchick@gmail.com>; Janet Boyd <janet4boyd@icloud.com>

Ms. Sabasteanski, I have reviewed the Action Alert e-mail you sent out (I hope I have that right) and before I comment, I would like to ask one thing. The "Background" section of your message discusses all the good things RGGI does and it does that well. I wonder if it might not be a good idea to have an additional bullet that point blank says: "This is the governor's stated reason for wanting to leave RGGI and this is why he is wrong." We talk around it a little bit in discussing where the money goes but we never really bluntly take on the negative. I think we should. He's wrong and I agree whole-heartedly with that, but I believe it would be worthwhile to say why he thinks it is a good idea and why he is wrong. It's not good enough to just say he's trying to kill a good thing. That's preaching to the choir. He must have a reason beyond it may save some people some money. We need to understand that reason and be able to counter it. Thank you for listening.

Bill Riffer

(If you are not the right person to send this to, please point me in the right direction; or tell me to shut up, that's okay too.)

Do Not Repeal Co2 Trading

Janet Taylor <taylor6840@gmail.com>

Mon 2/27/2023 3:59 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Janet L. Taylor
6840 Churchill Road
McLean, 22101
703.893.6215

Sent from my ipad

Air Pollution Control Board

Maureen Blackwood <maureensblackwood@gmail.com>

Mon 2/27/2023 4:29 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

I'm writing out of frustration with our state leadership that seems bent on pursuing an agenda that the vast majority of Virginians do NOT want. In this case, our governor is proposing that Virginia pull out of the Regional Greenhouse Gas Initiative.

Virginia needs the RGGI. HALF of RGGI revenue goes to low-income energy efficiency programs, mitigating rate increases for energy burdened households. RGGI dollars are being used throughout Virginia.

RGGI helps manage flood damage which is predicted to increase in future years. Revenue from RGGI has been better than projected and alternate funding sources that have been proposed are smaller, ignore low income households, and are contingent on available funding. The current budget surplus is the result of pandemic recovery efforts and is *not* permanent.

And most importantly, 61 legislators have already sent a message to the Air Pollution Control Board that "Virginia's participation in RGGI is mandated by law. Therefore, ultimately 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." Attempts to circumvent the law will end up in court costing taxpayers. But perhaps the governor only wants a soundbite to share on dubious programs?

Please lets not let Virginia become the butt of jokes about backwards administrations in the south. Be better.

Maureen Blackwood

RGGI

Patrice Hutton <patricehutton3000@gmail.com>

Mon 2/27/2023 5:50 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

I oppose repealing the CO2 trading program.

Thank you.

Patrice Hutton

Air Pollution Control Board

Anne Cahill <a1n1n6e@hotmail.com>

Tue 2/28/2023 12:56 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>; Citizen Boards (DEQ) <CitizenBoards@deq.virginia.gov>

To the members of the Air Pollution Control Board,

I have been a resident of Virginia since 1964. I strongly **oppose the proposal to pull Virginia out of the Regional Greenhouse Gas Initiative (RGGI)**. I have had the good fortune to see the benefits of RGGI. RGGI uses a proven cap-and-trade market-based system that reduces emissions and should be an essential part of Virginia's clean energy plan.

In addition, flooding is becoming an increasing problem throughout Virginia. By law, forty five percent of RGGI's revenues are used to address flooding issues throughout the state. RGGI provided Virginia with nearly \$228 million for flood protection in its first year and more recently added another \$74 million to Virginia's coffers for flood protection. I cannot comprehend why Air Pollution Control Board would want to lose this funding source for Virginia when no sustainable source has been proposed to replace this funding.

Furthermore, fifty percent of RGGI revenue is mandated to permanently reduce energy burdens on low income households through weatherizing. As with the flooding funds, no sustainable funds have been identified to replace this revenue source. As energy prices increase, low income households are being particularly harmed and are in desperate need of help.

Finally, I believe only the General Assembly has the power to repeal a law. I do not believe that it is within the power of a governor or state board. Attempts to circumvent the legislature will most likely end in court and taxpayers like myself will have to pay to defend an action that we oppose.

The Air Pollution Control Board should NOT pull Virginia out of RGGI.

Sincerely,
Anne Pickford Cahill
9353 Tartan View Drive
Fairfax, VA 22032
703-425-5643

Sent from [Mail](#) for Windows

Air Pollution Control Board

Susan Bivins <sabivins4@gmail.com>

Tue 2/28/2023 8:37 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

I oppose any repeal of the CO2 Trading Program. Climate Change is real and harming Virginia on a daily basis. The actions by the General Assembly in protecting the Virginia environment and supporting RGGI must stand. Quit playing political games with the environment. We need to protect all Virginias by managing CO2 and reducing emissions.

Susan A. Bivins

2594 Jockey's Neck Trail, Williamsburg, VA 23185

Repeal of CO2 Trading Program

Juliana Smith <juliana.smith@cox.net>

Wed 3/1/2023 11:26 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

I strongly oppose the governor's repeal of the CO2 Trading Program. As a mother of a son who has struggled with asthma, I believe we should do everything we can to preserve the quality of our air and environment. The governor's orders have nothing to do with ensuring public safety; it is all a political ploy, and I do not believe the majority of Virginians want us pulled out of this agreement. We should not move backwards!

Sincerely,

Juliana Smith

106 Tom Taylor Road, Toano, VA 23168

757-561-9799

Fwd: Public comment to the Virginia Air Pollution Control Board against leaving RGGI

Dan Manweiler <bitcrate@icloud.com>

Fri 3/3/2023 10:24 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Cc: DGM <bitcrate@gmail.com>

From his first day in Office, Governor Youngkin's made clear his desire to kill Virginia's participation in RGGI; the Regional Greenhouse Gas Initiative.

Governor Youngkin says RGGI's an unnecessary tax and Virginia's participation is only "authorized", it's not "mandated" by law. But RGGI is a big part of the path to reach a very clear mandate made under the Virginia Clean Economy Act; a mandate for the complete elimination of carbon dioxide emissions from Virginia's major sources (large electrical power plants) by 2050. The Governor's Executive order 9 surely will harm the goals set by the Clean Economy Act. Exiting RGGI makes no sense at all. Aside from failing to act on the climate issue, Virginians loose an estimated **\$105 million dollars a year for the next six years** in sales of CO2 credits on RGGI; money dedicated under the Clean Energy and Flood Preparedness Act to go towards:

Relief to localities hit by severe weather, recurrent floods. Higher tides and;

Construction grants for new housing developments & low-income energy home improvements That's a large sum of money the Governor is giving up. Citizens like myself, a long time resident of Southwest Virginia need our share.

And, a clear mandate already took place late last year when Va Air Pollution Control Board ignored Virginians on this issue in round one of public comments, by voting 4 to 1 in favor to exit RGGI after 740 people urged we stay and only 50 said leave.

We are writing to say we oppose any plans to remove Virginia from the Regional Greenhouse Gas Initiative or otherwise stall or slow progress to address climate change .

Shooting down RGGI means less relief for rural Southwest Virginia now and higher tides for Eastern Virginians later. Please don't do it VAPCB.

Thank you for the opportunity to comment,

Dan & Lynn Manweiler

18129 North Fork River Road

Abingdon, VA. 24210

Sent from my iPad

RGGI Withdrawal

JOSEPH SAVEIKA <joseph.saveika.sr@gmail.com>

Wed 3/8/2023 10:15 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

The governor's proposal to withdraw from the RGGI will cost the citizens of the commonwealth because rising sea levels must be stopped. The RGGI is a proven way to accomplish this. I oppose withdrawing Virginia from the RGGI program.

JOSEPH A SAVEIKA JR

3611 POINT ELIZABETH DRIVE

CHESAPEAKE 23321

757-484-2294

Repeal of CO2 BudgetTrading Program

Patricia Benson <bensonpw@me.com>

Wed 3/8/2023 10:16 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

I think it would be wrong to repeal this program, it seems to have multiple benefits for our mutual futures.

Patricia Benson
Bensonpw62@gmail.com

Sent from my iPad

Keep the RGGI

Wayne <vwaynedavis@gmail.com>

Wed 3/8/2023 12:38 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Dear Ms. Sabasteanski,

First off, I do not believe that the governor can “require” that Virginia be removed from the RGGI as suggested in the “Action:” statement of this item.

Apparently, he can, however, ask your rubber-stamp outfit to do the dirty work for him.

PLEASE DO NOT.

The RGGI is good for Virginia and for the entire world.

Your duty is to the citizens of Virginia.

I ask you to remember that and to act accordingly.

Thank you,

Virgil Davis

757-377-0566

Sent from [Mail](#) for Windows

Withdrawing Virginia from the Regional Greenhouse Gas Initiative

HENRY HOWELL <hthowell@cox.net>

Wed 3/8/2023 4:18 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Dear Ms. Sebasteanski,

Thank you so much for taking the time to speak with me regarding the subject of this email. Please do not withdraw Virginia from the Regional Greenhouse Gas Initiative. My wife and I believe that the benefits derived from our continued participation in this program far outweigh any economic loss we may incur.

Sincerely,

Mr. and Mrs. Henry Howell

6164 Allmondsville Road

Gloucester, VA. 23061

(757) 846-4795

Don't remove VA from RGGI

Patricia VonOhlen <wvonohlen@gmail.com>

Wed 3/8/2023 11:02 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

I would like to comment on the actions by Gov Youngkin as he tries to remove our VA from participation in RGGI. No!

I'm a lifelong resident of Virginia and I'm a grandmother and also, I'm a retired public school teacher. I am worried about climate change and the devastating effects it's having on our water, soil and air. I've read about the RGGI program and believe it will help reduce pollution and the program amounts to sound investment in our future. It's a strategy to combat climate change.

I have no idea why Gov Youngkin wants us to withdraw from RGGI and has no alternative plan to address the problems of climate change.

He has children and will have grandchildren. Doesn't he care about our Earth? Anything we do to help the electricity producers modify their practices and reduce their carbon emissions is a worthwhile program.

Please keep Virginia in RGGI!

patricia wvonohlen

Patricia VonOhlen
wvonohlen@gmail.com
757-218-3178

Regional Greenhouse Gas Initiative

Mary Ann Moxon <mamoxon@icloud.com>

Fri 3/10/2023 10:19 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

I do NOT support Governor Youngkin's aim of withdrawing from the Regional Greenhouse Gas initiative. This would be a major step back from meaningful climate change dialogue.

Mary Ann Moxon

2920 Nathaniel's Run

Williamsburg, VA 23185

STOP withdrawal from RGGI

Thomas Butt <thosbutt@gmail.com>

Fri 3/10/2023 11:30 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

I am writing to you to implore our government to continue with our participation in the RGGI.

With all due respect to Gov. Younkin, I have never supported or really understood his position to withdraw.

Regardless of that debate, a single elected official SHOULD NOT be making this decision. Leave it to our legislative bodies to decide or even better, initiate a referendum to tally citizen's positions. I live at 7' above sea level in Olde Towne Portsmouth. Our property is less than 2 blocks from the Elizabeth River. I believe we should make broad, but reasonable steps to protect our shores.

However, please do not interpret my recommendations to mean scrapping fossil fuels or other radical solutions.

Let's develop a program to encourage and help our farmers to fence cattle away from streams and rivers, monitor/ prosecute corporations discharging nitrogen and other toxic substances and increase our efforts to protect wetlands from developers.

On another critical issue, the corporate menhaden operations based on our Eastern Shore need to be held to a higher standard of environmental responsibility. They are harvesting far, far more menhaden than we should allow for the protection of other species that depend on this all important fish.

Thank you for this consideration.

Sincerely,

Thomas F. Butt

Regina L. Butt

Sent from [Mail](#) for Windows

Regional Greenhouse Gas Initiative

Dave Paige <davepaige37@icloud.com>

Fri 3/10/2023 1:41 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Do NOT remove the Commonwealth from the RGGI

Sent from my iPad

Do not withdraw us from RGGI

Mary Tyrrell <marytspecs@cox.net>

Fri 3/10/2023 2:48 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

What is the governor thinking?! We need all the help. We can get to combat problems that are caused by climate change. Areas are flooding even during just simple rain storms. Almost everyone I have spoken to be they Republicans or Democrats are against our withdraw. Listen to the people! And remember these people vote.

Sent from my iPhone

Regional Greenhouse Gas Initiative

John and Peggy Gibson <jpgibson61@yahoo.com>

Fri 3/10/2023 6:59 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

To: Karen G. Sabasteanski
Department of Environmental Quality
P.O.Box 1105
Richmond VA 23218

Please be informed that the attempt to withdraw from the Regional Greenhouse Gas Initiative would be a huge mistake for the present and the future of the state of Virginia.

Very truly yours,

Margaret J. Gibson
5345 Marian LN
Apt 223
Virginia Beach, VA 23462
803 -370 - 3113

FW: Governor's plan to exit RGGI

Rose, Jeannine (Virginia) <jeannine.rose@dpb.virginia.gov>

Mon 3/13/2023 12:44 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Hi Karen,

Just wanted to let you know we received this comment ourselves.

Jeannine

From: Patricia Esch <trishasvision@gmail.com>

Sent: Sunday, March 12, 2023 4:57 PM

To: West, Melanie (Virginia) <melanie.west@dpb.virginia.gov>; Rose, Jeannine (Virginia) <jeannine.rose@dpb.virginia.gov>; Getzler, Lawrence (Virginia) <lawrence.getzler@dpb.virginia.gov>; Hubbard, Scott (DPB) <scott.hubbard@dpb.virginia.gov>; Colvin, Ashley (Virginia) <Ashley.Colvin@dpb.virginia.gov>

Subject: Governor's plan to exit RGGI

I STRONGLY oppose the governor's plan to remove Virginia from RGGI. How can he be interested in his constituents and at the same time turn his back on millions of dollars that are crucial to the alleviation of our flooding situation as well as other environmental benefits? It makes no sense. Please see to it that this plan does not go through.

Thank you

--

Trisha Esch

Vision Communications

Graphic and Web Design

(757) 241-1217

FW: Governor's plan to exit RGGI

Rose, Jeannine (Virginia) <jeannine.rose@dpb.virginia.gov>

Thu 3/16/2023 2:42 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>; Porterfield, Melissa (DEQ) <Melissa.Porterfield@deq.virginia.gov>

Hi Karen and Melissa,

Just wanted to send this over in case no one else did. We recently migrated from Gmail to Outlook, and well, I think your agency already did that so you know what we're going through 😞. Sorry I didn't see this sooner.

Jeannine

From: Maureen Marroni <mmarroni1@hotmail.com>

Sent: Saturday, March 11, 2023 10:28 AM

To: West, Melanie (Virginia) <melanie.west@dpb.virginia.gov>; Rose, Jeannine (Virginia) <jeannine.rose@dpb.virginia.gov>; Getzler, Lawrence (Virginia) <lawrence.getzler@dpb.virginia.gov>; Hubbard, Scott (DPB) <scott.hubbard@dpb.virginia.gov>; Colvin, Ashley (Virginia) <Ashley.Colvin@dpb.virginia.gov>

Subject: Governor's plan to exit RGGI

Dear Madam/ Sir:

I live in Norfolk, Virginia at 2205 Corbett Ave. with my wife, Maureen N. Marroni. We STRONGLY oppose the governor's plan to remove Virginia from RGGI. How can he be interested in his constituents and at the same time turn his back on millions of dollars that are crucial to the alleviation of our flooding situation as well as other environmental benefits? What is it costing our state to be in RGGI that he would want to exit it? I am not a business person, but his reasoning does not make sense to me and my wife!!! Please, see to it that his plan is rejected.


Thank you for your consideration of our petition,
Edmond L. Marroni

DO NOT REPEAL RGGI

Glen Besa <glenbesa@gmail.com>

Thu 3/16/2023 5:17 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

 1 attachments (183 KB)

ADVAIR BILL.jpeg;

March 15, 2023

Governor Glenn Youngkin

Patrick Henry Building

1111 E Broad St,

Richmond, VA 23219

Karen G. Sabasteanski

Department of Environmental Quality

1111 East Main Street, Suite 1400

P.O. Box 1105

Richmond, VA 23218

SUBJECT: DO NOT REPEAL RGGI

Dear Governor Youngkin and Ms. Sabasteanski:

The medication I take daily for my asthma is expensive-**\$352.33/month-for Advair** (bill attached). Fortunately, I have good health insurance so while I paid the full cost of this asthma medication the first of the year, once I reach my deductible, I only pay \$30-\$40/month. I can afford it, but there are many low income and uninsured folks who could not afford \$352/month or even the \$30/month co-pay. And that is not counting doctors' bills.

RGGI, in reducing pollution from fossil fuel power plants, is cleaning up Virginia's air and reducing the incidence of asthma and asthma attacks so unless you want to pay my medical bills, I suggest you support RGGI and other measures to clean up our air like the Clean Cars law and the Virginia Clean Economy Act.

Sincerely,

Glen Besa

4896 Burnham RD

North Chesterfield, VA 23234

804-387-6001

glenbesa@gmail.com

Retain Virginia's membership in RGGI

Sidney Johnson <sidneyjohnson3@verizon.net>

Thu 3/23/2023 1:56 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

 1 attachments (7 MB)

RGGI Northern Va. Got \$10 Million From RGGI. Youngkin Wants Out DCist.pdf;

Dear Members of Virginia Regulatory Town Hall,

I am Sidney Johnson, a resident and registered voter of Virginia in Reston, County of Fairfax. I appeal for the retention of Virginia in the Regional Greenhouse Gas Initiative (RGGI).

First, we are in RGGI because the **Clean Energy and Community Flood Preparedness Act**, passed in 2020, mandates our participation. The Executive Branch cannot just sidestep or override a law passed by the General Assembly.

Not only localities, but individuals all over Virginia have benefited from the funding made available to the Commonwealth from participation in this regional cap-and-trade initiative. I have attached an article with an example of a beneficiary in Fairfax County.

The "rising cost of living" cited in the action summary is due much more to inflation and problems stemming from the impact of COVID than to the charge of about \$2.50 (*DCist*, 10.6.22) originally added to the monthly rate bill of residential customers. The new charge of \$4.64 (*Richmond Times-Dispatch* 2.15.23) that Dominion now wants to add is still proportionally small compared to the costs of repairing the damage that we can anticipate from the storms of the future. The price for climate change will have to be paid, and RGGI is a sensible way of anticipating it and evening the pressure across the population.

It is like an insurance policy. People pay an individual premium for household insurance, for example. They may never have a fire or a robbery, but coverage is there, if they do. The benefit to householders is so well recognized that household insurance is required.

As you will see from the attached article, the system is working, down to the benefits to low-income individuals who need help making their homes more resilient. Northern Virginia alone received \$10 million last year, just one year after joining. Moreover, Moreover, RGGI is prompting Virginia's power plants to decrease their own emissions, which have consistently decreased, dropping 16.8% overall as compared to 2020 pre-RGGI levels (EPA Clean Air Program). This is a good start for the first year of participation.

Please prioritize the real interests of Virginians--resilience in the face of storms and rising water, improvements to the homes of low-income individuals, less illness thanks to cleaner air--and stay in RGGI.

Yours sincerely,

Sidney Johnson

Legislator Comments on Proposed Regulation to Repeal Virginia's CO2 Trading Program

JoNathan Collins <jonathan@vasenatedems.com>

Fri 3/24/2023 1:16 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

 1 attachments (4 MB)

Legislator Comment to Air Board 3-23-2023.pdf;

Hello Karen,

On behalf of the members of the General Assembly who are signatories to the attached letter, please find their comments in reference to the Department's open comment period on the Proposed Regulation to Repeal Virginia's CO2 Budget Trading Program. Please consider the attached letter part of the public record of this comment period and ensure its availability to members of the Air Pollution Control Board.

Thank you,
JoNathan Collins

--

JoNathan R. Collins

Legislative & Member Services Director

Virginia Senate Democratic Caucus

Jonathan@vasenatedems.com

804-929-5755

Comments: Repeal CO 2 Budget Trading Program as required by Executive Order 9 (Revision A22)

Tom Dunlap <tdunlap@thejamesriver.org>

Tue 3/28/2023 2:12 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Cc: Shawn Ralston <sralston@jrava.org>; Bill Street <bstreet@jrava.org>

 1 attachments (176 KB)

3.28.23 RGGI Comments_JRA.pdf;

Good Afternoon Mrs. Sabasteanski

Please find comments from the James River Association for the "Repeal CO2 Budget Trading Program as required by Executive Order 9 (Revision A22)" attached to this email as a PDF. To avoid redundancy, we have not submitted through the portal on Virginia's Regulatory Townhall Website, however we would be happy to do so if preferred for submission.

Sincerely,

TOM DUNLAP

James RIVERKEEPER™

E TDUNLAP@THEJAMESRIVER.ORG | C [804.905.9724](tel:804.905.9724)

JAMES RIVER ASSOCIATION

16 SOUTH 17TH STREET, SUITE 100 | RICHMOND VA 23219

W THEJAMESRIVER.ORG | O [804.788.8811](tel:804.788.8811)

Charles Vaughn Ware
[REDACTED]
Richmond, Virginia [REDACTED]
[REDACTED]

March 29, 2023

The Virginia Air Pollution Control Board
111 East Main Street, Suite 1400
Richmond, Virginia 23218

Attention: Ms. Karen G. Sabasteanski

Karen.sabasteanski@deq.virginia.gov

VA DEQ does not have the authority to remove Virginia from RGGI

COMMENTS OF CHARLES WARE ON THE PROPOSED REMOVAL OF VIRGINIA FROM A CO2 TRADING PROGRAM AS REQUIRED BY EXECUTIVE ORDER 9

To the State Air Pollution Control Board:

I submit the following comments in response to the Virginia Department of Environmental Quality Notice of Proposed Rulemaking concerning Virginia's participation in the Regional Greenhouse Gas Initiative {RGGI}. The Virginia General Assembly mandated participation in RGGI in 2020 through the Virginia Clean Energy Act. Compliance with this regional initiative requires that Virginia regulated electric power utilities, essentially a state-managed duopoly of two major electric power firms, reduce CO2 emissions, with such climate-changing pollution reductions incentivized by a "cap and trade" scheme. The Governor of Virginia does not have authority to disregard legislation adopted by the General Assembly, nor does VA DEQ or the State Air Pollution Control Board have authority to withdraw from the agreement. Governor Youngkin's Executive Order Nine {2022} directs VA DEQ to evaluate costs and benefits of participation, which seems reasonable. However, this executive order demands that "all necessary steps" to withdraw from RGGI be taken even before such an evaluation has been presented for consideration. The 2023 session of the General Assembly rejected proposals to remove Virginia from the RGGI agreements.

Cap and trade initiatives originated with certain "moderate" Republican and Democratic Party elected representatives who have been supported by regulated industries, and by corporations involved in fossil fuel extraction, processing, and sales. Cap and trade incentives have been advocated as an alternative to what I believe to be a better approach to the current climate crisis. It is my opinion that major utility corporations such as Dominion Energy should be nationalized, and that the current practice of allowing preferred stockholders, corporate officers, and directors to extract exorbitant amounts of money from these utilities should be ended, as should be our current Virginia practice of allowing unlimited bribery of elected officials {or "contributions"} by

regulated corporations. Federal and state lawmakers should directly address the significant threats posed by the burning of coal for electric power generation {or other uses. Additionally, lawmakers should, and really must, address our nation's inefficient use of fossil fuels to power motor vehicles. Our taxation of motor fuels is at levels far below those of most other industrialized nations, and this has incentivized ownership of oversized and inefficient trucks and cars. Taxes on motor fuels could be used to build sustainable modes of transportation, such as {nationalized} high-speed freight and passenger rail systems. Federal and state governments should and must require higher energy efficiencies for residential, commercial, and institutional businesses through adoption of new construction and materials standards. Absent the political will in the United States to take these effective actions to address climate change, however, RGGI should continue as a stopgap measure.

Governor Youngkin's Executive Order quotes a filing by Dominion Energy with the State Corporation Commission that RGGI "will cost ratepayers between \$1 billion and \$1.2 billion over the next four years." Even if it was the role of the Air Pollution Control Board to minimize electrical utility costs {which is not the case}, this \$250 million/year cost should be contrasted with the demonstrable immediate costs of sea level rise attributable to climate change. These current costs in Virginia alone are in the hundreds of billions of dollars that will be needed to protect coastal lands from submersion. Among critical facilities having a substantial current risk of storm-induced flooding are Dominion Energy's Surry Nuclear Power Plant {Fukushima on the James}, and the Norfolk Naval Base and the vital Norfolk area seaports.

I note with interest a March 21, 2019 letter from Kate Addelson of the Sierra Club Virginia Chapter to Andrew McKeon, then Executive Director of the RGGI {based in New York City}. Addelson noted that, in 2019, Virginia was "far behind {other RGGI states} in its reductions of CO2 emissions. ... {and that} while RGGI states reduced their covered power plant emissions by 40% from 2008 to 2016, EIA data indicate that Virginia's emissions from all fossil-fuel power plants declined by only 7%. ... Virginia will have to continue reducing its CO2 emissions long beyond 2030 just to catch up {with the other RGGI states}." And, "we know from volumes of scientific studies that much greater CO2 reductions will be needed as we head towards 2050, just to keep worldwide temperatures from rising 1.5 degrees Celsius to 2.0 degrees C above pre-industrial levels."

Recent projections of global warming attributable to CO2 have been increasingly gloomy. It has been well-documented that major energy corporations concealed their knowledge of climate change based on their own assessments of the effects of increased fossil fuel usage in the post WWII period. This deliberate and criminal deception, and the spreading of disinformation, have encouraged widespread denial of climate change and its implications. On January 30, 2023, it was reported in *Proceedings of the Academy of Sciences* that global warming would surpass a 1.5 degree C target established in the 2015 Paris Climate Agreement "between 2033 and 2035, ... despite current efforts to limit fossil fuel pollution." It was also forecast that a two degree C warming level would likely occur by 2050 despite currently proposed pollution control efforts. There is a consensus among climate scientists that a two-degree increase would present an existential threat to human civilization.

I call upon every member of the Virginia Air Pollution Control Board to affirm their acceptance of this consensus view. Governor Youngkin's Executive Order, as well as many other of his policies regarding preservation of our environment, appear to be based on fundamentalist religious superstitions, an expedient view regarding the preservation of the rights and privileges of the ruling elite, political partisanship, and a rigid right-wing orthodoxy. I ask that if the Board rejects an agreement that is intended to reduce CO₂ pollution, and is able to sustain this rejection through the inevitable court review, that it should recommend more effective measures to address climate change.

Submitted as a life-long resident of Virginia.

Massanutten Resort Support for RGGI Participation

Massanutten Resort Snow Sports <snowinfo@massresort.com>

Fri 3/31/2023 9:56 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Cc: Harrell, Rachael (DEQ) <Rachael.Harrell@deq.virginia.gov>

Dear Ms. Sabasteanski,

I am writing on behalf of Massanutten Resort to extend our support and encouragement for Virginia's continued participation in the Regional Greenhouse Gas Initiative (RGGI). This effort to bring states together to collectively respond to climate change is a step in addressing the dire need for emission reduction, by reinvesting the money generated from this program back into Virginia communities. RGGI is creating the opportunity to hold power companies accountable for their emissions, which have the greatest net emissions reduction potential.

As a four-season resort, who is directly impacted by the effects of the changing climate, we see every day how critical it is to take direct action. Our winter sports are directly impacted by a warming climate, forcing us to adapt and invest in new technology to continue operations. As a business, we are taking steps to reduce our impact, but change needs to come from larger governmental programs, such as RGGI. We are not alone in these thoughts; a majority of Virginians also agree that the Commonwealth should stay in RGGI^[1].

Virginia has been experiencing the benefits of participating in RGGI, particularly in helping citizens who need it most. There has already been \$250 million collected to fund energy efficiency projects, half of which have gone to low-income projects^[2]. In addition to energy efficiency projects, the money is also supporting resiliency and flood mitigation programs, which helps the state become prepared for the change in climate. Staying in RGGI is proactive and preventative. But we cannot stop our efforts with what has already been done, it is necessary that this is just the beginning. Leaving RGGI would be a huge mistake and major regression to our climate change resiliency.

Climate change is having an impact on businesses and communities everywhere. The ski industry holds a unique criticality on weather, compared to other industries. We are already seeing seasons cut shorter all across the United States due to the warmer and shorter winter seasons, putting this \$50 billion industry at risk. Thus, I feel the need to reach out and express our extreme concern with the possibility of leaving RGGI. As a major driver of Virginia's economy in tourism, we hope that you will reconsider your stance.

We appreciate the work that you do and the potential impact that you can lead by staying in RGGI. Thank you for considering our perspective.

Sincerely,

Kenny Hess, Ski Area General Manager

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Comment letter re RGGI Action (Revision A22)

Sean Houton <shouton@pewtrusts.org>

Fri 3/31/2023 10:50 AM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

 1 attachments (229 KB)

RGGI.LTR.FPC.033123.fnl.pdf;

Good morning Ms. Sabasteanski:

Please find attached The Pew Charitable Trusts' comment letter for the Regulatory Action Revision A22. The letter's text was submitted on the comment portal as well.

Please let us know if you have any questions and thank you for consideration of our views.

Regards,

Sean Houton

Officer, Government Relations

The Pew Charitable Trusts

901 E Street, NW, Washington, DC 20004


p: 202-540-6308 | e: shouton@pewtrusts.org | www.pewtrusts.org

Electronic copy of comments on RGGI rule

Shobe, William M (wms5f) <wms5f@virginia.edu>

Fri 3/31/2023 12:52 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

 1 attachments (167 KB)

Shobe comments on the RGGI rule.pdf;

Hi Karen,

A few days ago, I sent over a paper copy of my comments on the proposed revisions to **9 VAC 5 – 140**. I have attached to this email an electronic copy of those comments, since that might make it easier in case DEQ folks need to craft a response to any of it. It's just a copy of what you already have on paper.

Best,

Bill

William M. Shobe

Professor of Public Policy

Director, Center for Economic and Policy Studies

E shobe@virginia.edu

P 434.284.1250



CBF comments on RGGI repeal

Liz Ronston <ERonston@cbf.org>

Fri 3/31/2023 1:05 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Cc: Rolband, Michael (DEQ) <Michael.Rolband@deq.virginia.gov>; Peggy Sanner <PSanner@cbf.org>; Patrick Fanning <PFanning@cbf.org>; Haley Edmonds <HEdmonds@cbf.org>

 1 attachments (137 KB)

CBF Comments on RGGI Repeal_03.31.23.pdf;

Good afternoon,

Please accept the attached comments from the Chesapeake Bay Foundation regarding the repeal of the CO2 Budget Trading Program as required by Executive Order 9.

Thanks and have a nice weekend.

Elizabeth Ronston

Chesapeake Bay Foundation

eronston@cbf.org

Cell Phone: 804-314-2439

Direct Office Line: 804-258-1862

Main Office Line: 804-780-1392

www.cbf.org

Comment re: Proposed Repeal CO 2 Budget Trading Program as required by Executive Order 9 (Revision A22)

Cale Jaffe <cjaffe@law.virginia.edu>

Fri 3/31/2023 1:34 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Cc: sahdoot@virginiaclinicians.org <sahdoot@virginiaclinicians.org>; John Bagwell <john@virginiaclinicians.org>; Sheena Patel (SP6ZC@virginia.edu)-AC <SP6ZC@virginia.edu>

 1 attachments (371 KB)

VCCA RGGI Comments March 31 FINAL.pdf;

Karen,

Attached please find the comments of the Virginia Clinicians for Climate Action (“Virginia Clinicians”), which are being submitted, by counsel, in opposition to the proposed action, “Repeal CO2 Budget Trading Program as required by Executive Order 9 (Revision A2).” Please do not hesitate to reach out to me if you have any questions or problems downloading the attachment.

Thanks,

Cale

Cale Jaffe

Professor of Law, General Faculty

Director, Environmental Law and Community Engagement Clinic

University of Virginia School of Law

www.law.virginia.edu/jaffe

<https://www.law.virginia.edu/academics/clinic/environmental-law-and-community-engagement-clinic>

(434) 924-4776

Proposed Repeal of CO2 Budget Trading Program - Comments

Nate Benforado <nbenforado@selcva.org>

Fri 3/31/2023 1:59 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Cc: Grayson Holmes <gholmes@selcva.org>; Claire Horan <choran@selcva.org>

 1 attachments (801 KB)

2023.03.31 - Repeal of CO2 Budget Trading Program - AppVoices Wetlands Watch AECV VAIPL Comments.pdf;

Ms. Sabasteanski,

SELC hereby submits comments to the Proposed Repeal of CO2 Budget Trading Program as Required by Executive Order 9 (Revision A22) on behalf of the Association of Energy Conservation Professionals, Virginia Interfaith Power & Light, Wetlands Watch, and Appalachian Voices.

At the end of the comments we've included a list of the attachments. The attachments can be downloaded here:

<https://southernenvironment.sharefile.com/d-s8aa55e5fac76470eac8d343d5931b4cc>

We request that the comment letter and all attachments be made part of the public record. If you have any trouble accessing the attachments, I'll be happy to email them in batches or whatever is most convenient to you.

Please let me know if you have any trouble with the attachments or any other questions!

Sincerely,

Nate Benforado
Senior Attorney
nbenforado@selcva.org

Southern Environmental Law Center
120 Garrett Street, Suite 400
Charlottesville, Virginia 22902

Office (434) 977-4090

southernenvironment.org
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VPF Comments on RGGI rulemaking

Hobey Bauhan <hobey@vapoultry.com>

Fri 3/31/2023 3:04 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

 1 attachments (68 KB)

VPF comments on RGGI withdrawal 3-31-23.pdf;

Dear Ms. Sabasteanski:

Attached are comments from Virginia Poultry Federation concerning DEQ's proposed regulatory action entitled, "Repeal CO2 Budget Trading Program as required by Executive Order 9 (Revision A22)." I would appreciate it if you would confirm receipt. Thank you.

Hobey Bauhan, President
Virginia Poultry Federation
P.O. Box 2277
Harrisonburg, VA 22801
540-433-2451 O
540-478-8199 M

Dominion Energy - Comments on Repeal of VA's CO2 Budget Trading Program

E.Willoughby@dominionenergy.com <E.Willoughby@dominionenergy.com>

Fri 3/31/2023 3:10 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Cc: Jason.E.Williams@dominionenergy.com <Jason.E.Williams@dominionenergy.com>

 1 attachments (405 KB)

Dominion Energy comments - RGGI repeal March 2023.pdf;

Karen,

Dominion Energy appreciates the opportunity to provide comments on the repeal of VA's CO2 Budget Trading program as required by Executive Order 9.

Please see our attached comment letter and please reach out to us if you have any questions regarding our comments.

Thanks,

Liz Willoughby

Dominion Energy Environmental Services

Cell: 804 240-3234

Email: E.Willoughby@dominionenergy.com


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Comment on Proposed Rule to Repeal Virginia's Participation in the Regional Greenhouse Gas Initiative (9VAC5-140)

Prabhu, Aditi A:(Constellation) <Aditi.Prabhu@constellation.com>

Fri 3/31/2023 4:43 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

 1 attachments (923 KB)

Constellation Comment on VA RGGI Rulemaking (as filed).pdf;

Dear Ms. Sabasteanski,

Please find attached Constellation's comments on Virginia's Proposed Rule "9VAC5-140. Regulation for Emissions Trading Programs (adding 9VAC5-140-6445; repealing 9VAC5-140-6010 through 9VAC5-140-6440)." We appreciate the opportunity to comment on this rulemaking.

If possible, please confirm receipt of this email and attachment.

Thank you,
Aditi Prabhu

Aditi Prabhu

Assistant General Counsel
Environmental Policy



Mobile: (202) 637-0342

aditi.prabhu@constellation.com | www.constellationenergy.com

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Hi Karen! NRDC comments att'd

Shepherd, Walton <wshepherd@nrdc.org>

Fri 3/31/2023 4:44 PM

To: Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

 2 attachments (351 KB)

NRDC Formal RGGI Comments.pdf; NRDC Member Comments RGGI.xlsx;

Hello Karen,

I hope you have been well. The arrival of spring weather has been great, so I hope you are getting to enjoy it. Hope to see you soon.

Back to workaday matters, I've attached NRDC's formal RGGI comments as a PDF (I will also upload to TownHall).

Separately, I have also attached, in an Excel file, the names and information of our 1,444 commenters that submitted a far more concise statement, which you can see below my signature. Those individual comments have also been submitted separately on TownHall (I hope this method of conveying NRDC's bulk member comments is amenable to you; we of course were not going to bombard your own email address!).

Please let me know if you have any questions, and thank you for your hard and diligent work, as always.

Walton

NRDC Member statement:

Dear Air Board members:

I'm writing today to implore you to REJECT the proposed Regulation for Emissions Trading 9VAC5-140 and do NOT attempt to illegally withdraw Virginia from the Regional Greenhouse Gas Initiative ("RGGI").

First, the RGGI program works to advance the Air Board's own mission to "abate, control, and prohibit air pollution." The proposed regulation would do the opposite -- increase air pollution -- in open contravention of Virginia law. What is more, air pollution in Virginia has been significantly decreased under the program (in both 2021 and in 2022, the first two years of the program), a benefit the proposed regulation and DEQ fact sheet fail to address.

Second, the Board lacks the authority to erase the existing RGGI regulations, under the terms of the RGGI law itself. Virginia's RGGI law clearly states the Air Board "shall" join RGGI, a clear mandate from the legislature that the DEQ fact sheet fails to address.

Third, DEQ's fact sheet fails to mention the lowered energy costs to low-income Virginians and the flooding protection benefits that RGGI provides Virginia, making the justification for the proposed regulation incomplete.

I hope that you listen to the vast majority of Virginians who support this key climate program and reject this regulation to withdraw from RGGI once and for all.

WALTON C. SHEPHERD

Virginia Policy Director & Senior Attorney

NATURAL RESOURCES

DEFENSE COUNCIL

2105 M STREET

RICHMOND, VA 23223

T 804.401.9236

@WALTONSHEPHERD

nrdc.org/experts/walton-shepherd

RGGI

katherine slaughter <katherineslaughter61@gmail.com>

Fri 3/31/2023 6:08 PM

To: Citizen Boards (DEQ) <CitizenBoards@deq.virginia.gov>; Sabasteanski, Karen (DEQ) <Karen.Sabasteanski@deq.virginia.gov>

Dear State Air Pollution Control Board:

i oppose withdrawal from the RGGI coalition. Joining RGGI was a much discussed matter. Air pollution and greenhouse gas emission know no state boundaries, and a regional approach ensures that states will collectively address issues in a given geographic area.

You will have many statements rationalizing withdrawal.

please think about the importance to our planet (and thus to our state) of using every available means to reduce Greenhouse gases.

Ask whether your grandchildren will be able to say that you took a stand against politics and for science and protecting the planet. Do the right thing.

Sincerely,

Kay Slaughter
Charlottesville, VA

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Kay Slaughter