

DEFEND VIRGINIA'S PARTICIPATION IN RGGI Fight Air Pollution While Helping Virginians!

What's happening: The Youngkin administration has issued a proposed regulation to withdraw Virginia from the Regional Greenhouse Gas Initiative (RGGI). This attempt to end Virginia's participation in RGGI will be a months-long process, with several opportunities for you to weigh in and have your voice heard. Ultimately, Virginia's Air Pollution Control Board will decide.

Where are we in the process: In December 2022, the Air Pollution Control Board voted to put out for public comment a [proposed regulation](#) that would repeal the regulation required for Virginia's participation in RGGI. That proposed regulation was reviewed by the executive branch and the public will now have a 60-day window for the public to comment on this notice.

What you can do: Submit comments **opposing** the repeal. Comments may be submitted on the [Virginia Townhall website](#) between Jan. 30 and Mar. 31. The administration needs to understand the broad public support for this program and we must counteract false and misleading narratives being circulated in the public sphere.

What to say: It's up to you! Here are a few ideas, but please highlight the issues that matter to you. Please do not copy and paste. Make your comment unique.

- **Oppose the repeal.** Explain why you want Virginia to maintain its participation in RGGI.
- **The repeal is unlawful.** Highlight that the 2020 law mandates that Virginia participate in RGGI.¹ The administration can't just brush aside the laws it disagrees with.²
- **RGGI is working great for Virginia.** Emphasize the data show RGGI is working. Since joining RGGI, Virginia's power plant emissions have consistently decreased, dropping 16.8% overall as compared to 2020 pre-RGGI levels.³ These recent reductions follow a decade without RGGI, where Virginia's emissions were "fairly constant" with "no discernible trend".⁴
- **RGGI improves public health.** Point out that decreased air pollution means fewer asthma attacks, premature births, and missed days of school and work. In just six years, participating states realized \$5.7 billion in public health benefits thanks to RGGI.⁵
- **RGGI is helping Virginians right now.** Explain that Virginia's participation in RGGI generates funds that are:
 - (a) providing safe, affordable and energy-efficient homes to low-income families in ways that were never possible before RGGI. Staying in RGGI at least through 2030 could upgrade 130,000 homes, saving \$89 million annually with average annual savings of \$676 per household, and sustaining more than 2,000 jobs.⁶
 - (b) providing dedicated funding to localities to plan for and prevent recurrent flooding. There is a massive need for this funding. Flooding damages, for example, will cost the state \$79.1 billion if left unchecked.⁷
- **RGGI helps protect utility customers from high bills.** Explain that fossil fuel costs are soaring, significantly driving up customer bills. RGGI ensures that power plant owners steadily reduce reliance on fossil fuels, protecting customers from these volatile commodities.

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- ¹ Gregory S. Schneider, *Democrats accuse Youngkin of sidestepping state law on environmental plan*, Washington Post (Sept. 9, 2022), <https://www.washingtonpost.com/dc-md-va/2022/09/09/virginia-youngkin-rggi-democrats-greenhouse/>.
- ² Patrick Wilson, *The mystery of the secret Virginia air board document*, Richmond Times-Dispatch (May 13, 2022), https://richmond.com/news/state-and-regional/govt-and-politics/the-mystery-of-the-secret-virginia-air-board-document/article_4bc77dff-7562-53c8-a65b-eabb1af3c34d.html.
- ³ EPA's Clean Markets Air Program Data, <https://campd.epa.gov/data/custom-data-download> (comparing 2022 emissions to 2020 emissions).
- ⁴ *Virginia Carbon Trading Rule and Regional Greenhouse Gas Initiative (RGGI) Participation, Costs and Benefits*, DEQ (Mar. 11, 2022), <https://www.deq.virginia.gov/home/showpublisheddocument/13813/637829669069026180> at 9-10.
- ⁵ Abt Associates, *Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative* (Jan. 11, 2017), <https://www.abtassociates.com/insights/publications/report/analysis-of-the-public-health-impacts-of-the-regional-greenhouse-gas>.
- ⁶ Pitt et al., *Investing in Virginia through Energy Efficiency: An Analysis of the Impacts of RGGI and the HIEE Program*, VCU L. Douglas Wilder School of Government and Public Affairs (Jan. 2023), <https://rampages.us/wilderresearch/wp-content/uploads/sites/37363/2023/01/Pitt-et-al.-2023-Analysis-of-the-Impacts-of-RGGI-and-the-HIEE-Program-1.pdf>.
- ⁷ Kaicey Baylor, *ODU researchers release new flooding costs report for Virginia*, 13 News Now (Sept. 15, 2022), <https://www.13newsnow.com/article/money/economy/odu-researchers-new-flooding-costs-report/291-059df778-b823-42c3-bf20-72b73f7ffb45>.