











April 9, 2018

Director David Paylor Virginia Department of Environmental Quality 629 East Main Street Richmond, VA 23216

# **RE:** Higher Education Support for Proposed Carbon Reduction Plan, "Regulation for Emissions Trading"

Dear Director Paylor:

As Virginia colleges and universities with campuses, investments, and thousands of students and employees in the Commonwealth, we write in support of the Virginia Department of Environmental Quality's (DEQ) proposed regulation to reduce carbon emissions from the electricity sector.

As academic institutions, we understand both the importance of reducing carbon pollution and the opportunities provided by clean energy. Colleges and universities are making commitments to reduce their carbon footprint and increase the use of clean energy, not only because it is the right thing to do but also because it makes business sense. Eleven Virginia colleges and universities have committed to becoming fully carbon neutral no later than 2050. Clean energy allows us to save money, hedge against volatile fossil fuel prices, and lock in predictable energy prices.

Market-based carbon-reduction initiatives have proven to be highly effective in reducing electric-sector greenhouse gas emissions while fostering economic growth and spurring innovation in clean energy technology. We recognize the importance of strong, stable policies that aim to account for the cost of carbon emissions and provide market certainty, allowing colleges and universities to plan and invest for the future. In Virginia, the proposed carbon reduction program would incentivize additional investments in renewable energy and energy efficiency—creating good-paying jobs for our graduates and others across the Commonwealth, attracting world-class students, faculty, and staff to our institutions, improving the well-being of the communities in which we're located, and making Virginia an even more attractive place to live and work.

<sup>&</sup>lt;sup>1</sup> Second Nature Reporting Platform as of March 27, 2018. <u>https://reporting.secondnature.org/</u>

<sup>&</sup>lt;sup>2</sup> From 2008-2015, the nine states participating in the Regional Greenhouse Gas Initiative (RGG) experienced CO2 emissions falling 16 percent more than the rest of the country, while the region's economy grew 3.4 percent more than other states and retail electricity prices dropped 3.4% across the region. See: Acadia Center. *Regional Greenhouse Gas Initiative Status Report:* Part I: Measuring Success. July 2016. <a href="http://acadiacenter.org/document/measuring-rggi-success">http://acadiacenter.org/document/measuring-rggi-success</a>

Furthermore, the proposed carbon reduction regulation will be beneficial for Virginia's economy as a whole. This smart initiative will grow Virginia's own nascent clean energy industry, help the Commonwealth stay competitive, reduce overall energy costs, and improve the resiliency of our electrical grid. It will also help utilities transition to a cleaner electric grid while hopefully offering more options for higher education institutions, businesses, and residents to access cost-competitive renewable energy.

Our institutions value an affordable, reliable, and clean electricity supply, and we commend the Northam Administration for its commitment to lead Virginia in the transition to a low-carbon economy. We appreciate the many months of compiled research and feedback the previous administration gathered from energy stakeholders to develop forward-thinking carbon reduction measures.

Steady carbon reduction policies will signal that Virginia is committed to embracing clean energy innovation, allowing institutions like ours to thrive for years to come.

Thank you for your leadership in fostering a clean energy economy in Virginia.

Sincerely,

Eastern Mennonite University Creation Care Council Emory and Henry College Hollins University Lynchburg College Randolph College Washington and Lee University

#### CC:

Governor Ralph S. Northam
Lieutenant Governor Justin Fairfax
Secretary of Natural Resources Matt Strickler
Deputy Secretary of Natural Resources Angela Navarro
Michael Dowd, Director of Air and Renewable Energy, Virginia DEQ
Virginia Senate Commerce and Labor Committee
Virginia House Commerce and Labor Committee

## **About the college and university signatories:**

#### **Eastern Mennonite University**

EMU was encouraging sustainable living long before "green" became trendy. It's always part of our understanding of our call to live gently with God's creation. EMU students live in LEED-certified, energy efficient residence halls. Our library draws power from the first commercial-scale solar installation in the state at its time (2010). The University has committed to becoming carbon neutral by 2035 through the President's Climate Commitment.

#### **Emory and Henry College**

Located in the Highlands of Virginia, Emory & Henry has devoted itself since 1836 to the belief that education can have a transformative effect on an individual, a place and ultimately the wider world. The College has committed to carbon neutrality by 2036 through the President's Climate Commitment.

### **Hollins University**

Hollins is an independent liberal arts university dedicated to academic excellence and humane values. Hollins University offers undergraduate liberal arts education for women, selected graduate programs for men and women, and community outreach initiatives. In 2007 Hollins became a charter signatory of the American College and University Presidents Climate Agreement and pledged to be carbon neutral by 2040. Hollins is committed to renewable energy initiatives.

#### **Lynchburg College**

Lynchburg College is a private, independent, residential college located on 264 beautiful acres in central Virginia. We take our responsibility to the environment seriously, and sustainability is one of our institutional values. Our commitment to a sustainable lifestyle is supported by the Claytor Nature Study Center. This 491-acre outdoor classroom provides learning opportunities for the LC and local communities. Our president joined the American College & University Presidents' Climate Commitment to ensure that our commitment becomes action, and we've invested \$4.65 million in energy upgrades. We manage a green revolving loan fund that is self-perpetuating and funds sustainability projects on campus. Our main campus utilizes green energy generated from landfill gas and hydro-power, and we are installing several small PV arrays on campus.

## Randolph College

Randolph College is a nationally recognized, private, liberal arts and sciences institution with a career focus located in Lynchburg, Virginia. Students, faculty, and staff are dedicated to improving the quality of life within the community without compromising the needs of future generations. Randolph has become a model for sustainable practices among small liberal arts colleges. Randolph was the first college in Virginia to sign the Presidents' Climate Commitment, committing to carbon neutrality by 2050.

#### Washington and Lee University

Washington and Lee's motto is *Non Incautus Futuri* - not unmindful of the future. The University has been preparing students for a life of service as future leaders for over 250 years. Our present goal is to lead the way to a more sustainable future by developing a learning community whose members are mindful of their responsibility to future generations, sensitive to the stewardship of natural resources, and equitable in their social and economic relationships. The University has pledged to reduce its greenhouse gas emissions 20% by 2020 and reach carbon neutrality by 2050.

To learn more or contact the signatories listed above, please contact joshua.kaplan@wwfus.org.