



SUSTAINABLE SOUTH BRONX

Comments on NYSERDA's Draft Operating Plan for Investments in New York Under the CO2 Budget Trading Program and the CO2 Allowance Auction Program
Issued March 23, 2009 by Sustainable South Bronx

RGGI Program Coordinator,

We would like to commend NYSERDA and the State of New York for creating and implementing a comprehensive approach to meaningful reduction of regional greenhouse gases. As advocates for Environmental Justice solutions, Sustainable South Bronx is committed to improving the quality of life in overburdened communities. We do this by creating equitable, living wage jobs which nurture and rehabilitate our natural resources.

Environmental Justice communities have long been the home to the City's unwanted land uses, today these communities host the most polluting industries including electric generation facilities without post combustion pollution controls. As a result these communities suffer from disproportionately high rates of asthma, obesity and diabetes. New York City has too long relied on highly polluting generation units by claiming reasons of reliability. As we move toward a reduced carbon society we must begin to incorporate long term planning into the operation of our electric grid, "day ahead" thinking and peaking units are not the solutions to achieving meaningful carbon reductions.

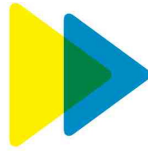
With a recently successful auction, funding is now available to transition to a Clean Energy Economy. We find the draft Operating Plan validating in its stress of carbon mitigation strategies. Mitigation through energy efficiency is the most sustainable pathway to a reduced-carbon economy. Through energy efficiency programs and investment in renewable clean energy, environmental justice communities will enjoy less pollutant laden air and access to the living wage jobs created by investment in a clean energy economy.

We greatly appreciate the opportunity provided by the public comment period and hope that as the RGGI initiative moves forward community based organizations are given more opportunities for meaningful participation. Please accept the following comments regarding the proposed program activities meant to achieve the Plan's objectives.

Thank you for your time,

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Program Selection Criteria

In the executive summary, six criteria are listed as having been considered when selecting the programs included in the Plan. Criteria 4 and 5 are two which the Plan's program activities could better address. It is through the lens of these criteria that we base our recommendations.

Criteria # 4

The program creates other benefits for New York, e.g., **creates jobs**, leverages capital investment in New York to promote economic development, **provides health and environmental benefits**, and enhances municipal capacity to further reduce GHG emissions.

Criteria #5

The initiative can help reduce the **disproportionate cost burden** and **harmful environmental impacts** on low-income families and **environmental justice communities**.

Empower the Advisory Board: Give Environmental Justice Organizations a Say in Administration

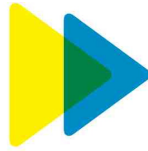
NYSERDA would greatly benefit in working with environmental justice organizations, like Sustainable South Bronx, to determine the fate of proposed program activities. EJ organizations have a great deal of expertise in disproportionate cost burdens and harmful environmental impacts caused by power generation. We also have on the ground experience in job creation through providing communities with health and environmental benefits. During the immense task of initiating the Plan's programs, an essential component to RGGI's success will be a proactive, transparent dialogue with EJ organizations. In order to meet criteria 4 and 5, EJ organizations must have a meaningful voice in determining which program activities are enacted.

Residential Space and Water Heating Efficiency Program

Work with EJ Organizations to Train an Entry Level Workforce

Greater outreach to EJ communities and assistance with upfront costs of residential energy efficiency programs is an effective way to reduce the cost burden of home heating and cooling on low income renters and homeowners. However a secondary perhaps more meaningful impact would be in job creation. Contractors participating in these programs will need a trained entry level labor pool. We recommend working with community based organizations who are operating job training programs and work with them to establish the curriculum which will enable their trainees to qualify for entry level positions with energy efficiency program contractors. The greatest and most sustainable way to ensure energy efficiency programs persist post the cessation of public subsidy is training individuals that live in target communities.

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Advanced Power Technology Program

We support distributed generation and other strategies to render our energy delivery system more efficient. We also support the research and development of advanced renewable energy technologies but caution investing a great deal of resources and hard infrastructure into carbon sequestration. We are concerned that carbon capture and storage will perpetuate a business as usual fossil fuel consumption rather than require that power producers and energy consumers take more meaningful measures to mitigate energy consumption. In addition, geological sequestration has led to negative impacts on ground water and drinking water in other Northeast communities. We caution investing in any technology that could have harmful impacts on natural resources and public health even if it's GHG reducing potential seems beneficial.

Sustainable Agriculture and Bioenergy

We wholeheartedly support the investigation and quantification of the carbon sequestration potential of New York's terrestrial ecosystem. As policies slowly begin to reflect the long understood ability of natural processes to filter, clean and cool our urban environment, we are hopeful that our urban forest and tidal wetlands will finally be given their rightful place as viable climate change mitigation and carbon capture strategies. Preserving, enhancing and maintaining our urban green and natural resources is a sustainable way to create jobs, enhance biodiversity and improve our air quality.