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To: [erda.sm.rggiprograms](#)
Subject: Comments on RGGI Operating Plan
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To Whom it May Concern,

Please consider the following comments on NYSERDA's RGGI Operating Plan Amendment for 2021:

It is essential to me and my extensive NYS AND NATIONAL ALLIES AND communities that the NYS RGII Operating Plan be fully aligned with the equity requirements of New York State's climate law—The Climate Leadership and Community Protection Act—and that the funds fulfill their purpose and are not directed elsewhere.

Equity and justice for children demand that the state plan incorporate k-12 school facilities. NYSERDA has not done this and in fact ignored schools — over objections— in its landmark report on climate impacts on the building sector.

RGGI funds COULD be a vitally important part of expanding good green jobs in New York and lowering energy bills during this uniquely difficult time in the state's history.

Disadvantaged communities AND THEIR SCHOOLS WHICH HAVE POOR VENTILATION AND SANITATION (US GAO 2020) are being hit hardest by the pandemic and climate impacts and need lasting relief. NYS IGNORES THIS AT RISK OF FURTHERING THE DECLINE OF CHILDRENS ENVIRONMENTAL HEALTH IN NEW YORK.

New York State COULD LEAD THE NATION BUT ONLY IF IT ADDS K-12 SCHOOLS AND continues leading the nation by example by not only ensuring these funds are going toward their intended purposes but that they are also being spent in the communities that need investment most.

NYS MUST PRIORITIZE CHILDRENS REQUIRED WORKPLACE— SCHOOLS. The benefits of spending money in disadvantaged communities AND THEIR SCHOOLS is a higher and more beneficial commitment than the concept of the benefits being “realized” in disadvantaged communities as articulated in the draft plan.

My organization also opposes the assumption in the amendment that Legislature will seek a transfer of RGGI funds for the state's general fund and/or to support programs of the Environmental Protection Fund. Over the course of the program, \$228 million of RGGI funds have been pulled out of the RGGI program to the state General Fund, depriving New Yorkers of funding that could have lowered energy bills and created good jobs. In light of the tremendous needs for pollution reductions in disadvantage communities, the past raids of RGGI funds must now come to an end.

Thank you for taking these concerns into consideration.

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