

ICLEI – Local Governments for Sustainability U.S.A., Inc. Comments on NY RGGI Operating Plan

March 25, 2009

General Comments:

- The municipal role in reducing greenhouse gas emissions is recognized as a crucial component in successful achieving the objectives of this program. However, there is no specific section, or even sub-section within the current operating plan that offers specific assistance to enhance municipal capacity to further reduce GHG emissions. Most of the references to municipal assistance is grouped into commercial/industrial and institutional sectors.
- Is there representation from all sizes and types of NY local governments during the initial phase and on-going? It seems like larger communities and more urban areas are going to be prioritized based on the types of projects they are targeting (except the sustainable Ag program). Is there going to be assistance available for small, rural communities as well?
- Will the Revolving Loan Fund encourage existing local programs or just remove barriers to begin climate protection programs?
- Are there opportunities for local governments in the Commercial/Industrial section? It seems like they might be eligible, but it's not exactly spelled out.
- There needs to be a clearer breakdown of the total amount of money available to local governments, by section, and the process in which to take advantage of those funds (grants, bidding, loans, etc.). Local governments will need clearer direction on the type and amount of resources that are available to them to make use of these resources more efficiently and effectively.
- There is a reference to a municipal program for climate protection, but it does not specifically highlight that it is the Climate Smart Communities Program. Can that be called out now that it has been officially launched?

Specific Comments:

- Page 1: Criteria for selecting programs not very heavily weighted on boosting municipal capacity.
- Page 2 and 6: It looks like there are two programs which LGs can benefit from – Residential, Commercial and Industrial (under the Municipal and Institutional Climate Change sector) and Multi-Sector Programs. That's \$88M that municipalities can take advantage of, some of which is competitive bidding and only open to large local governments. Compared to the rest of the funding available this is low, especially when a component of Criteria 4 is to enhance municipal capacity to further reduce GHG emissions.
- Page 4 and Page 52: The Statewide Photovoltaic Initiative includes residences, businesses, institutions and schools, but not local governments. Can this be expanded to include them or, if it already does, indicate such?
- Page 5 and Page 25-35: How do those three programs under Transportation encourage behavioral changes and smart growth policies? How are transportation projects going to be prioritized? Efficiency in more dense areas? Regional transit systems? Analysis of VMTs in an area and which transportation projects will reduce the most VMTs? It seems like if this sector is second to buildings in GHG generation that it would receive more than the amount allocated (\$93M compared to the \$524M for all programs, \$38M of which really focuses on VMTs).

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- Page 22: It says that the Municipal and Institutional Climate Change Programs are not anticipated to directly contribute to carbon reductions, but on Page 23, under Municipal and Institutional Programs, it says the program will be evaluated based on the number of entities reached and the achieved carbon reductions. Given that Criteria 4 is to support municipal efforts to further reduce GHG emissions, it would seem that the Municipal Climate Change Program would need to directly contribute to carbon reductions since it's one of the only Sections that specifically highlights funding for local government programs.
- Pages 62-73 outlines the Multi-Sector Programs. Is there going to be a clearer breakdown of the percentage of funds that will be available through this section for local governments? How is this providing local governments with funding/resources to support their efforts to reduce their carbon footprint? Where can they obtain funding to conduct inventories to measure their footprint so they know where to reduce it? This section also seems somewhat lopsided - for example, the Competitive Bidding Program targets large municipalities. Is there funding available for smaller, rural communities?