

Regional Greenhouse Gas Initiative Program
New York State Energy and research Development Authority
17 Columbia Circle
Albany, NY 12203

Via Email: rggiprograms@nysesda.ny.gov

May 22, 2015

RE: Comments on the 2015 RGGI Operating Plan Draft Amendment

To whom it may concern,

On behalf of Audubon New York, the State program of the National Audubon Society representing 50,000 members and 27 affiliated chapters, thank you for the opportunity to provide the following comments on the 2015 Regional Greenhouse Gas Initiative (RGGI) Operating Plan Draft Amendment. The RGGI has been a very successful at reducing greenhouse gas emissions, advancing energy efficiency and renewable energy projects, and increasing economic activity. The RGGI has also helped determine the state's vulnerabilities from climate change and develop solutions to address these threats. Overall, Audubon New York supports many of the proposed amendments for use of the funds and offers the following suggestions to strengthen the proposal.

Climate change is one of our greatest conservation challenges, and has become one of the leading threats to birds and other wildlife in New York and across the nation. In 2014, the National Audubon Society released the Birds and Climate Change Report: A Primer for Practitioners which found that nearly half of North American Birds are threatened by climate change. Many of these species are currently threatened by other factors, such as habitat loss, while others are species we previously considered secure but could face significant shifts in their ranges as a result of climate change. It's imperative that we develop and implement strategies to help wildlife adapt to climate change, and identify and protect the areas projected to provide important habitat strongholds under a future warmer climate.

That is why we strongly support the continued dedication of funding for climate research, which provides important resources to develop strategies to reduce emissions and prepare for a changing climate. This funding should be utilized to further support the creation of conservation policies that address the current and predicted impacts of climate change on the state's wildlife and habitats, and we look forward to working with NYSERDA and other partners to advance this. However, the \$1.2 million is a decrease from the \$1.5 provided in last year's Operating Plan Amendment and represents a steady decline in this funding when demand for understanding and planning for the impacts of climate change are increasing. We respectfully request that this funding be restored and increased should additional proceeds be generated in upcoming auctions.

As the health of New York's forests is critical for carbon sequestration, ecosystem services, and habitat for wildlife, we support utilizing RGGI funds to implement the Renewable Heat NY program. To ensure that Renewable Heat NY is advancing the proper stewardship of the state's forest resources we urge for language to be included in this

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section that prioritizes the use of third-party certified sustainably harvested fuel sources as part of the Renewable Heat NY, such as the following at the end of this section:

“...and a sustainable market takes shape, *which requires the use of certified sustainably harvested fuel sources.*”

By prioritizing certified fuel sources through this program, the state will simultaneously maximize emissions reductions while incentivizing practices that improve forest health and resilience.

In addition to Renewable Heat NY, we are pleased to see the recommendation that the Cleaner Greener Communities (CGC) program will be utilized to build green infrastructure and strengthen environmental protection. By encouraging communities to utilize natural resources like our forests to sequester greenhouse gas emissions and prepare for climate change, the state is incentivizing activities that can also create habitat for birds and other wildlife, helping them adapt to the changing climate. To build off these proposals, we also believe that New York, through RGGI, must develop a forest carbon sequestration off-set program that promotes forests protection and stewardship to increase the amount of sequestered carbon, while also providing wildlife habitat and ecosystem services benefits. We look forward to working with Regional Economic Development Councils and NYSERDA to continue to advance conservation oriented projects as part of this valuable CGC program, and develop new incentives to promote forest conservation.

With regard to the promotion of renewable energy, we strongly support the continued funding of the NY Sun program. To ensure this program maximizes solar production and minimizes environmental impacts, we recommend that this section include language for the installation of solar systems to be properly sited in order to avoid habitat fragmentation or degradation. Specifically, we offer the following suggestion to this section:

“Support from the Statewide NY-Sun initiative expands the reach of these activities by leveraging RPS funds to ensure a coordinated, well-funded *and properly sited* statewide solar energy expansion plan, in an effort to drive growth in the PV industry, ~~and~~ increase the affordability of PV technology, *and minimize impacts to the environment.*”

Additionally, as NY Sun continues to expand and facilitate more solar energy onto the grid, we recommend that RGGI funds be utilized to initiate a grants program for non-profit nature centers and other environmental education institutions to install renewable energy on their facilities. Our network of Audubon Centers are poised to become hubs for renewable energy production and development of new education programs to encourage similar consumer renewable energy choices, and a grants based program would help provide the necessary funding to jumpstart installation. We look forward to working with NYSERDA and other partners to develop such a grants program that would bring on new renewable energy and curb our reliance on fossil fuels, while further educating the public on the importance of taking similar actions.

We understand that the developing Clean Energy Fund (CEF) could be utilized to provide for such a program, and we support utilizing RGGI funds to advance this program. However, should

there be any delays in implementing the CEF, we propose the addition of language that would direct any of the funds not utilized in the next year of the operating plan to be redirected back into the other programs including the restoration of climate research funding, or creation of the renewable energy grants program mentioned above.

Thank you again for the opportunity to comment on the 2015 RGGI Operating Plan Draft Amendment, and for your consideration of our recommendations. We look forward to working with NYSERDA and other partners to continue to strengthen the RGGI program and develop a longer term plan to provide greater consistency and vision for the use of this important funding source.

Should you have any questions regarding our comments, please contact Sean Mahar, Director of Government Relations of Audubon New York at 518-869-9731 or smahar@audubon.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Crotty". The signature is fluid and cursive, with a small "cc" written above the end of the name.

Erin Crotty
Executive Director
Audubon New York