UPROSE

To: New York State Research and Development Authority (NYSERDA)
From: UPROSE
Re: Regional Greenhouse Gas Initiative (RGGI) Operating Plan Revision

On March 23, 2010 a coalition of Environmental Justice / Community-based organizations and the New York Lawyers for the Public Interest (NYLPI) submitted comments on the original RGGI operating plan. UPROSE thanks NYSERDA for replying to our comments and for improving some aspects of the original operating plan as a response to these.

In light of the stated budgetary changes and the need to reduce, re-distribute and eliminate funds for the different sectors and programs UPROSE:

Continues to oppose the use of RGGI funds for Carbon Capture and Sequestration (CCS). We believe that these funds would be better used in other sectors/programs where funding was significantly decreased in the revised version of the operating plan. Some of the areas that should be prioritized are:

1. Outreach and education for programs under the Residential, Commercial, Industrial and Municipal Sector- (almost 55% reduction in funding)
2. Transportation Efficiency and Advanced Transportation Programs- (72% decrease in funding). The transportation sector is one of the highest contributors to GHG and other air pollutants and thus should be a high priority.
3. Multifamily Performance Program- particularly for the conversion of oil fired boilers and furnaces to cleaner fuels
4. Advanced Building Systems and Industrial Process Improvements
5. Advanced Renewable Energy and Advanced Power Delivery

The reduction of GHG requires a decrease in our overreliance of fossil fuels whose extraction generates unwanted social and environmental costs. NYSERDA should not use this important source of funding for "demonstration projects" and research of the "geological sequestration potential" when other initiatives with proven GHG reductions are losing funds.

Thank you for the consideration of this matter. We look forward to hearing from you.

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