



March 25, 2021

Hon Andrea Stewart-Cousins  
Majority Leader  
New York State Senate  
LOB 907  
Albany, New York 12247

Hon. Carl E. Heastie  
Speaker  
New York State Assembly  
LOB 932  
Albany, New York 12248

Dear Majority Leader Stewart-Cousins and Speaker Heastie:

We appreciate your continued leadership and dedication to Climate Justice. We strongly support the Senate and Assembly's efforts to reject the Governor's annual proposal to transfer of \$23 million of Regional Greenhouse Gas Initiative (RGGI) revenues to the General Fund. The Climate Leadership and Community Protection Act (CLCPA) requires RGGI proceeds be invested in ways that prioritize frontline, environmental justice, and disadvantaged communities. The Governor's diversion of RGGI is wholly inconsistent with the equity requirements of the CLCPA. This budget and future RGGI spending plans should further the CLCPA's requirement that NYSERDA invest or direct resources in a manner so that disadvantaged communities receive a minimum of 40% of the overall benefits of spending on clean energy and energy efficiency programs, projects, or investments.

RGGI funds should remain dedicated to programs aimed at serving schools and buildings in disadvantaged communities, community energy engagement, priority population workforce development, and energy efficiency financing for communities with a majority of households with low and moderate incomes. NYSERDA should continue to expand and develop programs and grant opportunities that adequately support community energy planning and community ownership in the transitions to renewable and resilient energy systems. Funding should also be made available for the development of community driven Just Transition plans to identify the needs – and the resources necessary to address those needs – of communities impacted by the shift away from a fossil-fuel based economy. Finally, RGGI proceeds should contribute to development that prevents, rather than enables, gentrification and displacement from disadvantaged communities.

Other examples of direct benefits may include:

- Reduction in localized pollution from stationary and mobile sources and related health benefits;

- Health benefits related to reduction in thermal vulnerability and exposure to extreme heat and cold, as well as improved indoor environmental quality resulting from the mitigation and abatement of legacy environmental hazards (e.g., lead, asbestos);
- Economic benefits, including but not limited to job creation, energy efficiency savings, utility bill assistance, energy resilience, and community ownership of renewable distributed energy resources;
- Job training, apprenticeship programs, entrepreneurship opportunities and small business support for residents and youth, both now and as public and publicly leveraged investment expands employment in emerging clean energy sectors including community-based models for inclusive job creation, such as UPROSE's Green Resilient Industrial District (GRID) proposal for Sunset Park, Brooklyn and PUSH Buffalo's Green Development Zone on the West Side of Buffalo;
- Funding, education, and resources for existing businesses to adopt climate adaptive and mitigative practices, designs, and operations;
- Workforce and business funding and technical support programs to prevent clean energy transition-related worker displacement;
- Quality of life benefits, such as housing security and protection from neighborhood displacement, as well as increased access to mass transit/active mobility, green infrastructure, recreational green spaces, and public amenities; and
- Benefits related to democratic participation, such as access to community-determined climate and clean energy planning and decision-making processes and accountability frameworks.

It is critical that RGGI funds, especially those dedicated to disadvantaged communities, be protected from diversions for purposes other than clean energy and carbon and pollution abatement. Since 2015, over \$200 million in RGGI proceeds have been transferred to the State Budget to supplant state spending on tax credits and other programs that are inconsistent with the equitable spending requirements included in the CLCPA.

We look forward to the passage of a final budget that finally ends the annual transfer of RGGI funding and lives up to the equity requirements for the CLCPA.

Sincerely,

Environmental Advocates of NY  
 NYC Environmental Justice Alliance  
 UPROSE  
 PUSH Buffalo  
 NY Lawyers for the Public Interest

cc: Hon. Andrew Cuomo, Governor  
 Hon. Steve Englebright, Chair, Assembly Environmental Conservation Committee  
 Hon. Todd Kaminsky, Chair, Senate Environmental Conservation Committee  
 Carrie Gallagher, Acting Deputy Secretary for Energy and the Environment  
 Rajiv Shaw, Assistant Counsel for Energy and the Environment