

May 22, 2006

To: RGGI Environmental and Energy Commissioners
and Staff Working Group

From: Annie Wilson, Energy Committee Chair,
Sierra Club Atlantic Chapter

RE: Comments on the RGGI Model Rule

- A 30 % reduction of CO2 emissions by the generators would be appropriate.
- The Sierra Club opposes pollution trading.
- The imports and leakage report is due in 2007, subsequent modeling will shift current projections.
- CO2 offset projects include methane from unsustainable CAFO's, as well as afforestation projects for which there is currently no guarantee for perpetuity.
- Nuclear power and large hydroelectric dams should be explicitly defined as ineligible as a non CO2 emitting resource.

The RGGI must be accompanied by aggressive legislative measures which will reduce the use of fossil fuels by the transportation and building sectors.

