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August 2, 2017

Andrew J. McKeon
Executive Director
RGGI, Inc.
90 Church Street
New York, NY 10007

Dear Mr. McKeon,

Power plants that burn fossil fuels, waste, and biomass for electricity disproportionately pollute marginalized communities. Whether these are low-income communities, communities of color, or English as a second language communities, we recognize this as environmental injustice. Historically, these same communities -- such as Bridgeport, CT or Springfield, MA -- have also been left out of board rooms and spaces where decisions are made.

The current Regional Greenhouse Gas Initiative (RGGI) Program Review is an opportunity for the New England states and New York, Maryland and Delaware to address some of these injustices. We are writing to ask for low-income communities, communities of color, and communities where fossil fuel infrastructure or environmental injustices are concentrated to have a say in RGGI decisions and benefit from RGGI and its proceeds.

Environmental justice organizations are concerned that market-based cap and auction programs may not sufficiently address pollution in communities least likely to resist or to be heard. States involved in RGGI need to listen and address concerns about the risk of increasing or continued pollution in certain locations. We urge states to do that by conducting proximity (how close to vulnerable communities) and cumulative impacts (what else is already polluting those places) analyses, and by modeling other kinds of power plant pollution that are linked to health problems like asthma, including SO_x, NO_x, and fine particulates. The states should also continue to explore mechanisms to track and evaluate potential impacts of RGGI on emissions in communities where there have historically been disproportionate impacts from power plants, including the effect of eliminating exemptions for biomass and the impacts of current exemptions for facilities whose individual units are exempt under RGGI's 25 MW size threshold but whose total size exceeds 25 MW.

We strongly support the adoption of a cap that incorporates an adjustment in 2019 and is *at least* as ambitious as the one proposed in policy scenario #3. The cost differences between this scenario and the status quo are miniscule, but imposing a higher cap would result in the avoidance of an additional 99 million tons of carbon pollution and thousands of tons of conventional air pollutants as well. Such a reduction in power plant emissions occurring within the RGGI footprint is critically important for residents of overburdened environmental justice communities. Given the uncertain fate of the Clean Power Plan and the lack of support for

federal regulation of carbon pollution, the RGGI states must adopt even more ambitious goals to reduce emissions in the region. For this reason, we encourage the states to consider a stronger cap, such as the 5% level that has received broad support from stakeholders across the region.

We are grateful that New York, Maryland, Delaware, and Massachusetts have made RGGI stakeholder meetings easier to access and more inclusive. After our last communication with you in July of 2016, the Department of Environmental Protection and Department of Energy Resources in Massachusetts responded to our request and made big strides in accessibility by holding evening stakeholder meetings in two environmental justice communities in the state. At stakeholder meetings in Dartmouth and Springfield, Massachusetts, last fall, fifty to seventy residents attended each meeting. They shared passionate stories about how the program has impacted their communities and families, gave feedback on the program, and suggested ideas for strengthening it. We thank Massachusetts for being responsive to our request, and we ask for continued efforts to hold accessible stakeholder meetings in the future.

However, not all RGGI states are doing this. Stakeholder meetings have been hard to find information about, scheduled when community members are likely to be working, and designed for people who speak English and are highly technical. For these reasons, we also ask that the participating states and the RGGI Board take the following steps:

- 1. Work closely with low-income communities, communities of color, and communities where fossil fuel infrastructure or environmental injustices are concentrated:**
 - a. Conduct proactive outreach using linguistically and culturally appropriate materials.
 - b. Solicit feedback on meeting plans and outcomes from environmental justice and frontline community leaders.
- 2. Design stakeholder meetings so working families can more easily participate:**
 - a. Hold meetings in overburdened and marginalized communities, in places people can easily reach via public transportation.
 - b. Schedule meetings outside of normal business hours and offer childcare.
 - c. Provide interpretation services and linguistically appropriate meeting materials.
- 3. Respond to community concerns:¹**
 - a. Dedicate a substantial amount of time during stakeholder meetings for public input and feedback.
 - b. Develop a transparent system for responding to stakeholder comments and concerns.

Finally, the revenue raised through RGGI auctions should be heavily invested in communities that have dealt with harmful health effects and economic disinvestment related to fossil fuel, waste, and biomass power generation, and in programs that deliver local benefits. These include energy efficiency and weatherization services that are accessible to low-income homeowners and renters, transition assistance for workers who will be displaced by reduced investment in polluting power plants, and community solar projects that allow more households to participate in the clean energy economy. We understand that these decisions are made on a state level, but encourage RGGI Inc. and the participating states to incorporate language

¹ The Environmental Protection Agency's Clean Power Plan (CPP) calls on states to work closely with communities experiencing environmental injustice and requires a response to their concerns. Despite the Trump administration's efforts to stop the CPP, the public participation requirements it describes should be followed by all RGGI states.

requiring direct investment in environmental justice communities into the new model rule and any future enabling legislation or regulations.

The 2016 RGGI Program Review is our chance to reduce carbon pollution and support a just energy transition and economic development in communities experiencing environmental injustice. We urge you once again to work in partnership with these communities to do just that, and look forward to creating a stronger and more just RGGI together.

Sincerely,

Acadia Center

Massachusetts and New York

Alternatives for Community & Environment

Roxbury, MA

Arise for Social Justice

Springfield, MA

Boston Climate Action Network

Boston, MA

Clean Water Action

Connecticut and Massachusetts

Climate Action Now

Massachusetts

Coalition for Clean Air South Coast

Somerset, MA

Conservation Law Foundation

Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont

Delaware Concerned Residents for Environmental Justice

Wilmington, DE

ECHO Action NH

New Hampshire

Fall River Residents for the Responsible Siting of LNG

Fall River, MA

Gardening the Community

Springfield, MA

Hands Across the River Coalition

New Bedford, MA

Marion Institute/South Coast Energy Challenge

Marion, MA

Maryland Environmental Health Network

Baltimore, MD

Neighbor to Neighbor

Lynn, Springfield, Holyoke, and Boston, MA

New Haven Leon Sister City Project

New Haven, CT

North American Indian Center of Boston

Boston, MA

NorthStar Learning Center of New Bedford

New Bedford, MA

No Sharon Gas Pipeline/Clean Energy Now

Sharon, MA

Pace Energy and Climate Center

White Plains, NY

Partnership for Policy Integrity

Maine, Massachusetts, New Hampshire, New York, and Vermont

Physicians for Social Responsibility

Greater Boston, Massachusetts, Maine, and New York

Pioneer Valley Asthma Coalition

Springfield, MA

Sierra Club
National

South Coast Neighbors United
East Freetown, MA

Springfield Area Interfaith Climate Action Network
Springfield, MA

Springfield Climate Justice Coalition
Springfield, MA

St. Mary's River Watershed Association
St. Mary's City, MD

Stop NED
Massachusetts

Toxics Action Center
Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont

Unitarian Universalist Society of Greater Springfield Green Team
Springfield, MA

Waterkeepers Chesapeake
Takoma Park, MD

Westfield Concerned Citizens
Westfield, MA

Youth on Board
Boston, MA

350 Massachusetts
Cape Cod and South Coast

CC:

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Governor Andrew Cuomo, *New York*

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