



Audubon NEW YORK

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October 26, 2012

Regional Greenhouse Gas Initiative
90 Church Street, 4th Floor
New York NY 10007

Re: Comments on the proposed program design concepts for the new Regional Greenhouse Gas Initiative's (RGGI) Model Rule

On behalf of Audubon New York, the State Program of the National Audubon Society representing 27 affiliated local chapters and 50,000 members, I thank you for the opportunity to comment on the program design concepts proposed in the 2012 program review. Audubon is dedicated to protecting birds, other wildlife and their habitats and is deeply concerned with the potential risks that climate change poses to terrestrial and aquatic ecosystems and the species that depend on them. Already, we have observed numerous changes in bird species distribution in response to a warming climate¹. To reduce the threats posed by climate change, Audubon strongly supports the Regional Greenhouse Gas Initiative's (RGGI) goals to reduce carbon dioxide emissions in the Northeast, and endorses any attempts to strengthen implementation of this model program.

With regard to the newly proposed design concepts to improve RGGI, Audubon New York firmly believes that in order for these to be successful at enhancing the program, the emissions cap must be updated and lowered, as has been proposed by other environmental and energy organizations. Updating the cap will ensure that meaningful reductions in carbon dioxide continue, and reflect the actual emissions profile in the region while also ensuring implementation of the proposed offsets. Specifically on the proposed design concepts, we will focus our comments on the proposed U.S. Forest Offset Program.

Audubon has long advocated for protection of healthy, sustainably managed forests that provide a full array of ecosystem services and are resilient in the face of climate change. We fully support the adoption of a Forest Offset Program to RGGI, and appreciate that California's comprehensive forest offset program in AB32 program was used as the model. However, in order for this type of program to be effective in the RGGI States, an aggregation component will be necessary.

There are many small private landowners that together control a large percentage of forested land throughout the northeast states, and this is especially true for New York. 64% of the total acreage in the state is owned by landowners possessing less than 1,000 acres each, while only 3% of landowners own 1,000 acres or more, not including state owned land. To create an effective carbon offset forestry program, it must appeal not only to large forest owners, but also the smaller private landowners than manage the majority of forests in this region.

In addition, this forest offset program should have strong recommendations for promoting sustainable forestry and also include direct linkages to implementing each state's Sustainable Forestry Assessment and Strategy (FRAS). The stated goal of these FRAS plans is to keep forests as forests, and the best way to ensure this goal is reached is to attract the small landowners who together own large portions of forest land. The Forest Project Protocol¹, developed by the Climate Action Reserve, provides has established a strong forest carbon offset program and has recently developed rules and procedures for utilizing aggregation to alleviate transaction costs for individual small landowners to encourage their participation. This program is a good model to follow when developing an aggregation component into the Forest Offset Program for RGGI to make the program more accessible to the large percentage of the regions landowners.

We thank you again for the opportunity to comment on the proposed program design concepts for the new RGGI Model Rule and look forward to working with you to ensure their successful implementation. Should you need any additional information regarding these comments, please contact me at 518-869-9731 or smahar@audubon.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Mahar', with a long horizontal flourish extending to the right.

Sean Mahar
Director of Government Relations
Audubon New York

¹ <http://www.stateofthebirds.org/2010>

² <http://www.climateactionreserve.org/how/protocols/forest/dev/version-3-3/>