

Implementing Statewide Sustainability Goals on the Regional Level: New York State's Cleaner Greener Communities Program

Lindsay Robbins, New York State Energy Research & Development Authority

ABSTRACT

NYSERDA launched the Cleaner, Greener Communities Program (CGC), a statewide, \$100 million grant program, in September 2011 to encourage communities to develop and implement regional sustainable growth strategies. The first phase of CGC is the Regional Sustainability Planning program and is intended to provide the necessary resources for each region in New York State (NYS), as defined by the boundaries of NYS's ten economic development districts, to develop comprehensive region-specific sustainability plans. Engaging in the planning process will allow each region to develop its vision, goals, and objectives for a sustainable future and to identify the activities or types of projects needed to achieve that future. When phase one of the program is complete, NYS will be the first state in the US to have comprehensive regional sustainability plans and implementation strategies that cover the entire state. These plans will facilitate the achievement of statewide carbon reduction, energy efficiency, renewable deployment, and other environmental goals on the regional level where they can be incorporated into local policies and projects where real impacts can be made. Once this planning framework has been established, phase two of the program will make competitive implementation grants available that regions can apply for to fund key projects that support the implementation of their plans. This paper will discuss the design of the program and the initial implementation of the first phase, focusing specifically on the challenges presented by implementing statewide sustainability goals through a regional planning process and how the design of the program has addressed those challenges.

Background

During his 2010 campaign for NYS Governor, Andrew Cuomo issued several policy briefs describing his vision for "The New NY Agenda". The 8th in that series of briefs, *Cleaner Greener NY* (Cuomo 2010), laid out his agenda for "protecting and improving" New York State's environment. A key part of that agenda was a proposal for the creation of a competitive grant program that would support the development of innovative comprehensive regional sustainable growth strategies throughout the state. The program as envisioned would leverage existing efforts such as the Climate Smart Communities Program (CSC) (DEC 2012a) and the recently enacted Smart Growth Public Infrastructure Policy Act, which requires that all public infrastructure projects file a Smart Growth Impact Statement that verifies that project's compliance with the state's Smart Growth Criteria (NYS 2011a). The brief proposed several possible funding sources for the program including federal funding from the Partnership for Sustainable Communities (DOT, EPA, HUD 2012), Systems Benefit Charge (SBC) (PSCb 2012) or Renewable Portfolio Standard (RPS) (PSCa 2012) rate-payer funding from NYS's Department of Public Service (DPS), or NYS's proceeds from its participation in the Regional Greenhouse Gas Initiative (RGGI) (RGGI 2012).

Soon after coming into office in January 2011, Governor Cuomo announced in his 2011 State of the State Address the creation of the Cleaner Greener Communities Program (CGC), a competitive grant program intended to support sustainable regional growth with six main goals: to incentivize the establishment of sustainable communities, stimulate economic revitalization through the creation of green jobs, increase energy efficiency and the deployment of renewable energy generation throughout the state, improve environmental justice in vulnerable communities, support the development of environmentally friendly public and private transportation options, and protect and preserve NYS's vast environmental resources.

Governor Cuomo earmarked a total of \$110 million to fund the program out of NYS's proceeds from its participation in RGGI, a market-based regulatory CO₂ cap and reduction program. The New York State Energy Research and Development Authority (NYSERDA), who administers the deployment of RGGI funds for NYS in partnership with the Department of Environmental Conservation (DEC), was tasked with designing and managing the program with input from other state agencies including the Department of State (DOS) and the Department of Transportation (DOT). The funding was earmarked under the heading of the "Cleaner Greener Communities Program".

A portion of the funding was set aside to fund existing programs that support achievement of the same goals that had been established for CGC. Five million dollars was set aside to support the Climate Smart Communities Program (CSC), which was referenced in the Governor's *Cleaner Greener NY* policy brief. CSC is a joint effort between NYSEDA, DEC, DOT, DOS and DPS that was initially launched in 2009 with the goal of "reducing greenhouse gas emissions and saving taxpayer dollars through climate smart actions that also promote community goals of health and safety, affordability, economic vitality and quality of life" (DECa 2012). CSC began as a voluntary program that encouraged local governments to sign a Climate Smart Communities Pledge (DECb 2012) that committed them to take specific actions to combat climate change in their communities. The program provided guidance and informational resources to those communities that signed the pledge and kept them up to date on local, state and federal funding opportunities that could support their efforts. This five million dollars in RGGI funding gave them the necessary resources to launch a pilot initiative to hire contractors that would be tasked with acting as a resource to existing CSC participants to help them engage in climate action planning, conduct greenhouse gas emissions inventories, and develop strategies for reducing emissions on the local level. Contractors would also be responsible for increasing the penetration of the program and getting more local governments to sign on. The first phase of the pilot program would provide contractor coverage for four of NYS's ten regions.

Another \$5 million was set aside to support NYSEDA's Energy Smart Community Coordinator Program (E\$C) which provides outreach and support statewide to engage communities and promote the resources available to NYS residents to help them reduce their energy usage and GHG emissions.

New York State's Economic Development Agenda

Governor Cuomo's 2011 State of the State address announcing the creation of CGC also announced other initiatives, and the main focus of the address was the Governor's goal of transforming NYS's economy. One of the key strategies announced in the address for accomplishing that goal was the creation of Regional Economic Development Councils (REDCs)

that were intended to fundamentally change the way that NYS engaged in economic development by allowing decision making to occur on the local level with the people that know their local economy best. The REDCs were officially launched in August 2011 with five primary responsibilities: “develop and maintain an initial 5-year Strategic Plan for regional economic growth, coordinate economic development within the region, leverage public and private resources, identify obstacles to growth and implement performance measures to track progress over time.” (NYSb 2011)

Modeled after the federal Empowerment Zone program (HUD 2012), NYS was divided into ten regions, each with their own REDC. Each REDC is co-chaired by a member of the business community and a member of the academic community from that region. The councils are filled with regional stakeholders representing a broad range of public and private interests and are supported by staff from a variety of state agencies.

The REDCs were given only a few short months to develop their initial 5-year Strategic Plans for regional economic growth and those were completed in November 2011. To encourage competition between the regions, plans were judged and the regions with the four best plans each received \$40 million dollars from the newly established ESDC Regional Council Capital Fund.

The creation of the REDCs established a competitive, regionally focused, and economic development-driven approach to creating change on a statewide scale which served as a model for the development of the Cleaner Greener Communities Program.

Program Design

In the summer of 2011, NYSERDA set out to design and launch CGC with a budget of \$100 million. There were several design parameters that were necessary for the program team to work within based on the RGGI funding supporting the program and on guidance that was provided to NYSERDA by the Governor’s office and other key stakeholders:

- The program must support both the development and the implementation of regional sustainability plans.
- No more than 10% of the budget could be utilized to support the development of regional sustainability plans.
- Regions must be defined by the REDC regional boundaries.
- Regional sustainability plans developed through the program must be closely aligned with the goals of the REDC’s Strategic Plans in each region.
- The program should be highly competitive to award the very best projects.
- Projects receiving implementation funding must fall within the scope of the permissible use of RGGI proceeds (energy efficiency, renewable energy, and innovative carbon reduction programs).
- The current RGGI program is only authorized to run through 2015 so the funding should be fully committed by the end of 2015.
- Regions should align their greenhouse gas emission reduction goals with NYS’s commitment to reduce greenhouse gas emissions by 80% below 1990 levels by 2050.

The design of the program was a collaborative process between NYSERDA program staff and several other key state agencies including DEC and DOS. A high priority was ensuring

that CGC complemented and did not hinder or duplicate the efforts of other state programs or related policy initiatives.

Program Structure

CGC is a two Phase program. Phase I, referred to as the Regional Sustainability Planning Grant Program, provides funding to regions to support the development of comprehensive regional sustainability plans. Phase II is the implementation phase where funding will be provided to implementation projects that contribute to the achievement of the goals identified in the regional sustainability plans that are developed in Phase I.

CGC Phase 1: Regional sustainability planning grants. A total of \$9.6 million was allocated to Phase I. CGC was always intended to be a competitive program, but the decision was made to utilize Phase I to give all ten NYS regions the opportunity to engage in a comprehensive sustainable planning process, essentially leveling the playing field for Phase II which is expected to be highly competitive.

The plans developed by the regions are expected to outline specific and tangible actions to reduce GHG emissions in line with the statewide goal of 80% below 1990 levels by 2050, inform municipal land use policies, serve as a basis for local government infrastructure decision making, guide both public and private infrastructure investment, and enable each region to strategically identify and prioritize the projects that they will submit for consideration in Phase II. Funding can only be utilized for activities necessary for the development of the region's sustainability plan. It cannot be used for project implementation or project feasibility studies.

Phase I of CGC is an investment in NYS's future and will establish a statewide sustainability planning framework that will aid in statewide infrastructure decision making while providing regions with the resources they need to develop region-specific sustainability goals and objectives and to identify the activities and types of projects needed to achieve those objectives.

In order to commit both Phase I and Phase II program funds, by 2015, Phase I is on an accelerated schedule. Regions are expected to complete their plans within eight months of receiving their grant funding.

Regional planning team structure. Development of the Planning Team Structure for the CGC regions involved resolving several issues. The regional boundaries for CGC follow boundaries based on economic criteria that were created for the REDC's. These boundaries often did not correspond with regions utilized for NYS regional planning in the past, and the boundaries of several regional planning organizations did not correspond at all to the REDC regions. In addition, when planning occurs on the city, county, state or federal level, governance entities and structures are already in place that can take on responsibility for administering funds and leading a planning process, but there was no governance structure whose jurisdiction corresponded to the CGC boundaries and that could perform these functions for the CGC regions. While the REDC and CGC boundaries correspond, the REDC's mission does not encompass sustainable planning and the council structure is not set up in a way that would allow them to apply for and manage a grant from a program like CGC.

To resolve these issues, CGC chose to follow the model established by HUD's federal Sustainable Communities Regional Planning Grants Program, which requires regions to apply for funding as a "consortium". HUD defines an eligible applicant as "a multijurisdictional and multi-sector partnership consisting of a consortium of government entities and non-profit partners" (HUD 2011). In the HUD model, every consortium must have a "lead applicant" that acts as the conduit for funding. Like NYSERDA, HUD must have an entity with which they can enter into a contractual agreement in order to provide grant funding. The lead applicant serves as that entity and takes on the responsibility for the management of the funding.

In CGC, applicants must be a municipality (county, city, town, village, Indian tribe or nation residing within NYS) acting on behalf of a consortium of other municipalities within their region. If a consortium is awarded a grant, the municipality that submitted the application on behalf of the consortium, referred to as the lead municipality, holds fiscal and administrative responsibility for regular interaction with NYSERDA. Non-profit or private partners can sign on as supporters of a consortium and can participate actively as members of a region's planning team once an award is received, but the consortium itself is limited to municipal participants to ensure that appropriate procurement procedures are utilized in the dispersal of grant funding within the region. Consortia applying to the program are required to have a membership that is representative of the municipalities within their region, and to demonstrate their ability to successfully engage and enable collaboration with their region's key public and private stakeholders.

Each region is eligible to receive up to \$1 million in grant funding. Only one award is issued to each region. The goal for Phase I is to have one qualified consortium coordinating plan development in each region, but the consortiums are not required to do the planning work themselves. Consortiums must make every effort to use the existing planning resources within their regions, which may include municipal planning offices, regional planning boards or Metropolitan Planning Organizations (MPOs), but consortiums are expected to engage planning consultants that can provide the necessary technical assistance and staff to conduct a comprehensive sustainability planning process within the program's ambitious eight-month timeframe.

Sustainability plan requirements. Within the eight-month plan development timeframe regions are required to deliver plans that include:

- A baseline assessment of the region, including inventories of greenhouse gas emissions and energy use as well as assessments of natural resource and economic assets, liabilities and opportunities.
- Long-term and short-term sustainability goals for the region including greenhouse gas reductions and sustainability goals for energy use and supply, transportation, water management, waste management, land use and livable communities, economic development, governance and climate change adaptation. The plan will include metrics for each goal and a commitment to annual reporting.
- Actions to achieve greenhouse gas reduction or other sustainability goals, including barriers to successful implementation and proposed means for removing such barriers.

- An implementation plan showing how the municipalities will collaborate and a plan implementation schedule with timetables of targeted milestones and completion dates for actions described in the plan.
- Stakeholder involvement throughout plan development and implementation.

In order to accommodate regions like New York City that have already developed comprehensive sustainability plans, regions with existing plans that cover their entire region can use Phase I funding to expand the scope of their plans, align the goals of their existing plan with their region's REDC strategic planning efforts or conduct additional planning work that will support the prioritization of projects that will contribute to the state's carbon reduction, renewable deployment and energy savings goals.

CGC Phase II: Implementation phase. Phase II of CGC is expected to launch in early 2013 and will provide funding on a competitive basis for implementation of specific projects that provide the greatest opportunities for achieving carbon reductions, energy efficiency savings, and renewable energy deployment consistent with a region's sustainability and REDC strategic plans.

The plans developed in Phase I will be comprehensive in scope covering a broad range of sustainability issues. Because of the requirements of CGC's funding source (RGGI), implementation projects will have to focus specifically on energy efficiency, renewable energy and carbon emission reduction. The majority of deployment programs run by NYSERDA are funded with electric and gas rate-payer funding which restricts NYSERDA to working with building or commercial facility owners that are electric or firm gas customers. RGGI funds however provide NYSERDA with some degree of flexibility in the types of projects that can be funded, and CGC's RGGI funding source gives the program the flexibility to fund innovative projects that would be challenging to fund under other circumstances. NYSERDA expects regions to take full advantage of NYSERDA's existing suite of programs to help them achieve their sustainability goals, but CGC implementation funding will also focus on innovative projects in sectors such as transportation and land use.

The design for Phase II of CGC has not yet been finalized, but is expected to be complete at some point during the summer of 2012 at which point the details of the program will be made public so that regions will be aware of the requirements for the second phase of the program as they work to complete their sustainability plans and implementation strategies.

Initial Program Implementation Challenges

Sustainability metrics. Regions are required to develop a baseline assessment of their region that will serve as the basis for the sustainability targets they develop and the benchmark against which they will measure progress towards those targets over time. The baseline assessment includes both a GHG inventory and an assessment of other key sustainability metrics linked to the focus areas of the plans: energy, transportation, land use and livable communities, waste management, water management, economic development, climate change adaptation and governance.

In order for regions to establish sustainability plans that have the ability to make a real impact on the sustainability of their region, they must set concrete targets and develop

implementation strategies for achieving those targets. GHG emission reductions are key, but in order to address sustainability in a more comprehensive fashion, other metrics must be employed. Choosing the most appropriate metrics to measure a region's sustainability in areas as amorphous as land use, transportation, governance, or waste management is very challenging. Many people working on sustainability initiatives around the country are currently grappling with this issue.

CGC offers NYS a unique opportunity to simultaneously conduct multiple regional planning efforts throughout the state that can all be held to similar criteria and standards. Originally, the CGC program team planned to develop a list of sustainability metrics that the regions would be required to use in their planning process in order to ensure that all of the plans incorporated the most important metrics and that each of the planning teams would measure them in a consistent fashion so that they could be compared across the state. Regions would be allowed to utilize additional metrics of their choosing, but would have to include all of the required metrics.

A Sustainability Indicator Working Group was convened to develop a list of required sustainability metrics. This working group included NYSERDA staff, representatives from DOT, DOS, DEC and the Department of Agricultural & Markets, climate and sustainability experts acting as contractors for both the Climate Smart Communities & CCG programs and representatives from an environmental NGO.

Several of the working group participants are also involved with the Transportation Climate Initiative (TCI). TCI is "a regional collaboration of twelve Northeast and Mid-Atlantic states that seeks to develop the clean energy economy and reduce greenhouse gas emissions in the transportation sector" (GCC 2012). Their Sustainable Communities Workgroup has undertaken a research project to identify best practice policies and programs and opportunities for collaboration within the twelve participating states. As part of that effort, TCI convened a Metrics Workshop in December 2011 with the goal of educating participants on the breadth of sustainability performance metrics currently in use throughout the country, identifying the gaps in metrics deployment that must be filled in order to effectively track the outcome of programs and policies, and identifying a list of metrics that provide the greatest value to those seeking to measure the performance of sustainable policies and programs. TCI's research is still underway, but NYSERDA has been fortunate enough to be able to participate in the process and utilize some of their preliminary findings in the development of its own set of prioritized sustainability metrics for CGC.

One of the first decisions made by the working group was that developing a list of required metrics was unrealistic. There is too great a degree of variability in the type of metrics that may be the most appropriate for different types of regions. Instead, a decision was made to develop a Sustainability Indicator Guidance Document that would be provided to the regions to highlight key metrics in each of the focus areas required in the planning process and provide detailed guidance on how to calculate those metrics and where to source data for them so that any of the regions that choose to utilize the key metrics will be measuring them consistently and utilizing the same data sources wherever possible. While the regions will not be required to use all of the metrics prioritized in the guidance document, they will be required to justify those metrics that they choose not to utilize from the document. The regions are encouraged to utilize additional metrics that they feel are important for their region, but those metrics and the way in which they are measured will have to be pre-approved by NYSERDA.

The Sustainability Indicator Working Group started the process with a comprehensive list of more than 300 sustainability metrics that were culled from multiple sources. After several rounds of revisions and feedback gathering from a broad range of stakeholders the final list was cut down to 36 metrics for which detailed guidance was developed.

CGC Prioritized Sustainability Metrics

Focus Area	Category	Metric
Climate Change Adaptation	Ecosystems	ratio of land conserved to land developed
	Energy	SAIFI System Average Interruption Frequency Index
	Flood Zones	economic value of property vulnerable to storm surges and flooding
	Water Resources	% of regional water supply governed by rule curves
Economic Development	Agriculture	# of working farms
	Investment	investment in alternative-fuel vehicle infrastructure and/or public transportation
		investment in renewable energy infrastructure, smart grid and/or efficiency retrofits
Sector Analysis	jobs created (by sector)	
Energy	Efficiency	regional energy consumption per capita
		on-site building fuel consumption per end use (residential/commercial/industrial)
	Renewable Energy	installed customer-sited renewable capacity % of regional energy use provided by renewable energy capacity
GHG	Electricity	GHG emissions per unit of electrical power (lbs CO ₂ /MWh)
	General	CO ₂ emitted by emission Source (fuel combustion, industrial production, agriculture, transportation)
	General	GHG Emissions per capita (MTCO ₂ e/person)
Governance	Land Use Policy	% of region with local energy codes exceeding New York State energy code
		% of region with incentive zoning, TOD zoning, mixed use zoning and/or other zoning policies
	Programmatic	# of Climate Smart Communities
	Municipal Leadership	inventory of benchmarked and retrofitted municipal buildings, fleet efficiency improvements, and siting public buildings in locations with multi-modal access
Tax Policy	% of Municipal Centers with tax policies and incentives to encourage development	
Land Use & Livable Communities	Housing	housing density (for urban, suburban, rural)
	Land Use Patterns	Sprawl-Entropy Index
		per capita land consumption % development (jobs, housing) occurring inside/outside municipal centers
Transportation	Accessibility	% population w/in X miles of transit
	GHG	Vehicle Miles Traveled (VMT)/VMT per capita
	Overall	% of passenger miles traveled by on-road vehicle, rail, bus, transit, walking
	Affordability	% of household income spent on housing + transportation
Waste Management	Collection Fleet	annual energy use of waste collection fleet per vehicle
	Landfills	% of municipal solid waste landfilled
	Overall	Municipal Solid Waste (MSW) generated per capita
	Recycling	% of municipal solid waste recycled

Focus Area	Category	Metric
Water Management	Energy Use	energy used by water treatment and storage facilities
	Overall Demand	per capital water consumption
	Sector Demand	water demand by sector (agricultural, industrial, commercial, residential, power generation)
	Stormwater Runoff Capacity	gallons of design retention capacity of installed green infrastructure

CGC Sustainability Indicator Guidance Document

Greenhouse gas inventories. The GHG inventory portion of the baseline assessment that regions are required to develop appeared to be more straightforward than the sustainability metrics, but proved equally challenging. NYSERDA made the decision to utilize the Environmental Protection Agency’s (EPA) 2009 Draft Regional Inventory Guidance (EPA 2009) as the standard regions should use in developing their GHG inventories. At the time the standard was chosen it was known that there was a great deal of flexibility in the guidance that allowed regions to choose the best possible methods for their particular region, but NYSERDA wanted to ensure that a consistent approach was used across the state. Working closely with the Climate Smart Communities Program (CSC) which is responsible for developing the GHG inventories in the four regions they support through their pilot program, the CGC team determined that to make decisions about which methods should be chosen in each instance where the EPA Guidance offers options, and to apply those methods to all of the regions, would be impossible to do effectively without the input of the regions themselves and their consultants who will be on the ground gathering data and performing the analysis.

To overcome this challenge NYSERDA made the decision to establish the New York Regional GHG Working Group and require representatives from each regional team to collaborate through the group to align their approaches to conducting GHG inventories to the maximum extent possible. The working group is tasked with conducting a review of the EPA guidance, establishing a minimum reporting framework for regional GHG inventories, and adopting a flexible accounting framework suitable for New York State. It will also serve as a collaborative forum to assist the regions in completing the regional GHG work that is required for their participation in CGC and/or CSC. This will all happen as the regions are in the process of conducting their baseline assessments so that real-time feedback can be incorporated into the process. The end goal of the working group is to establish a common foundation in New York State for developing inventories that can be utilized as a statewide standard.

Many municipalities throughout NYS have already conducted some sort of GHG inventory. Incorporating those inventories into a region-wide inventory that follows a standard methodology without losing any more work that has already been accomplished than necessary presents a real challenge for the regional teams. The working group presents an opportunity for regions to share protocols that have been established and used in existing regional GHG inventories and will allow the group as a whole to make some of the more difficult decisions about which methodologies can be utilized. NYSERDA hopes that participation by all regions and their consultants will ensure that a reasonable protocol will be developed through the leveraging of statewide expertise.

NYSERDA will provide regions with an initial Tier 1 GHG inventory for their regions that is based on the 2009 statewide inventory that was conducted by NYSERDA and other state partners for NYS's Climate Action Plan (CAP 2010). This top down analysis will provide regions with a point of reference that links their emissions to the statewide numbers. Their task will be to utilize the guidance that comes out of the working group to conduct a more in-depth Tier II analysis that will provide the granularity necessary for them to utilize their inventory to set concrete goals for their region.

The working group will meet on a weekly basis for approximately nine weeks to review the EPA 2009 Draft Regional Inventory Guidance and assess what regions consider standard sources and methods for New York, what can easily be made a standard (e.g., avoiding incidental differences in emission factors, etc.), and what are larger or more granular methods that should be worked on but cannot be standardized immediately.

After each call moderators will create and post a call report summarizing outcomes and current sector working notes for anyone that has not attended the calls. Additionally, a message board and database site will be set up to facilitate the distribution of updated protocol documentation and continued discussion of any issues. The message board will serve as a central location for all comments to encourage real-time input that is not limited by the weekly call agenda items.

Beyond this, the group will continue to work monthly to explore sector-specific and more granular approaches to be added to the framework. For consensus findings during this initial review period, NYSERDA expects all regions to attempt to adhere to the findings of the working group or to justify and document why they were not able to do so. NYSERDA intends to harmonize regional GHG efforts as much as possible but, at a minimum, any deviations from the group's consensus must be justified and documented.

Stakeholder engagement strategies. One of the biggest concerns for Phase I of CGC is ensuring that the regional plans that are developed with the planning grants are representative of the regions as a whole and not just those municipalities that are the most actively involved in sustainability initiatives. The planning team consortium structure is intended to help to address that issue by requiring that program applicants showcase an initial ability to engage a broad range of municipalities. If a consortium is selected to receive a planning grant for their region they are expected to actively seek to expand their consortium to include more municipalities and one of the very first steps required in the planning process is the development of a Stakeholder and Public Engagement Strategy to ensure that municipalities not brought into the consortium have an opportunity to provide input into the planning process and to ensure that all other key stakeholders, both public and private will be engaged in the planning process as well. The Engagement Strategy must identify the key public and private stakeholders involved with sustainability issues within the region, the roles they play, how they interact with each other, and what level of participation in the sustainability plan development process will be required of them.

Later on in the planning process as part of the development of the plan's Implementation Strategy, regions are required to identify the lead municipality, other partners, and stakeholders responsible for implementing each component of their proposed Implementation Strategy; establish implementation timelines; and outline the specific actions necessary to meet sustainability targets. The Implementation Strategy must also include a plan for gaining approval

and adoption of the final Sustainability Plan by municipalities within the region to ensure that wherever necessary the goals of the Sustainability Plan will be incorporated into local laws and ordinances.

Regions will also be required to hold one or more public meetings in which the residents of each region can voice their opinions and submit written comments prior to the creation of the final version of their Sustainability Plans. The regions must document all comments received in the public meeting(s) and submit a public feedback summary describing the proceedings and comments received about the draft Sustainability Plan. The public feedback summary must draw upon the meeting minutes in order to describe the issues discussed that warrant any changes to the Sustainability Plan and the final version of the Plan must incorporate the public feedback received wherever reasonable and appropriate.

Communication and outreach play a major role in the ability of a planning team to successfully engage both the general public and those that may be involved with projects or initiatives relevant to the planning process. NYSERDA's approach to communications for the program has been to develop a consistent messaging and branding strategy for the program as a whole that the regions are required to utilize in their outreach and marketing materials, but allow the regions to brand and market their own regional plan in the way that best reflects their region's unique identity. Sustainability can be defined in many different ways and while the planning process itself requires that the regions take a very comprehensive approach to sustainability, the regions have found it useful to focus on certain key aspects of sustainability in their messaging that they hope will encourage stakeholders in their region to become more involved in the planning process. Focusing on the potential positive economic impacts of the sustainability plan has been particularly popular, especially in some of NY's more economically challenged regions.

Conclusion

The planning process for NYS's ten regions has only just begun, but so far the main lesson learned from both the development of the program and the initial stages of the planning process is the key importance of flexibility in the structure of the program.

Without a robust framework for benchmarking performance and evaluating progress it is difficult to judge the effectiveness of programs and policies and compare them to one another. There is a real need to work towards a national consensus on the best strategies for measuring the success of sustainability initiatives, specifically how we track GHG emissions and other sustainability indicators on the regional level, but there is a fine balance between the value of standardization and the value of allowing enough flexibility for innovative solutions to region-specific issues to arise.

The program team has attempted to maintain that balance in CGC by standardizing the measurement of sustainability indicators without prescribing the indicators a region must utilize in order to measure their sustainability performance and establish their targets for improvement. The GHG Work Group has been structured to allow for all of the regions to participate actively in the development of the state's GHG inventory standards, ensure that regional concerns are addressed, and to allow each region to play a part in the development of the standards that they will be required to use in the future. The program has also allowed for flexibility in the branding of the regional plans in the hopes that by choosing region-specific marketing strategies, the

regions will be better equipped to engage their stakeholders and create implementable plans with the necessary stakeholder buy-in.

To date, the program has received positive feedback from the regions regarding the GHG Inventory Working Group, the sustainability indicator strategy, and the flexibility of the plan structure itself and how it can be branded for each region. Flexibility has been built into the program in order to facilitate not only the successful completion of the plan, but also to enable each region to develop a sense of ownership over their plan and to utilize the planning process as a means of creating more cohesion within the region that will facilitate cooperation later on when implementation of the plan begins. This flexibility combined with robust technical standards and the resources necessary to engage in a comprehensive planning process will hopefully enable each region to successfully develop their own strategies for helping NYS become more environmentally and economically sustainable.

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