



March 25, 2024

Basil Seggos, Commissioner
New York State Department of Environmental Conservation
625 Broadway, 14th Fl
Albany, NY 12233

RE: Building Community Resilience through Greenhouse Gas Emission Reductions

Dear Commissioner Seggos:

On behalf of the North American Sustainable Refrigeration Council (NASRC), we are pleased to express our support for the New York State Department of Environmental Conservation's (NYSDEC) application to the U.S. EPA Climate Pollution Reduction Grants (CPRG) program, titled "Building Community Resilience through Greenhouse Gas Emission Reductions." With this proposal, NYSDEC, in partnership with the New York State Energy Research and Development Authority (NYSERDA), will implement programs that reduce greenhouse gas emissions from facilities and services that serve key resiliency purposes for New York's communities. The programs included in this proposal will not only address greenhouse gas emissions in the near- and long-term but will also provide substantial co-benefits such as air quality improvements and health benefits, with a particular focus on public services and disadvantaged communities.

NASRC is a 501(c)(3) environmental nonprofit working to advance climate-friendly natural refrigerants and reduce greenhouse gas emissions caused by traditional hydrofluorocarbon (HFC) refrigerants. We collaborate with stakeholders from across the industry, including over 55,000 food retail locations, to eliminate the barriers to natural refrigerants in U.S. grocery stores.

Once considered a suitable replacement for ozone-depleting substances, HFCs are one of the most potent drivers of climate change. Pound for pound, HFCs trap thousands of times more heat in the atmosphere than CO₂. Classified as short-lived climate pollutants, HFCs have a disproportionate impact on warming in the near term, making their mitigation significantly more urgent than other greenhouse gases.

Natural refrigerants, including CO₂ (R-744), Ammonia (R-717), and Hydrocarbons (R-290, R-600a) are the most climate-friendly solution. Unlike most other refrigerant alternatives, they are not at risk of being categorized as per- and polyfluoroalkyl substances (PFAS), making them the most future-proof solution for the refrigeration industry.

However natural refrigerants are not a "drop-in" solution for existing facilities, so the transition from HFCs requires a costly full replacement of the refrigeration system. This cost burden is particularly challenging for small and independent businesses and those operating in disadvantaged communities, as these businesses often lack the financial resources to transition their facilities. Funding support is crucial for small and independent businesses disproportionately impacted by the cost to transition away from HFC refrigerants.

NASRC is the third-party administrator for a program in California that is similar to Measure 2 in this application. There, the Fluorinated Gas Reduction Incentive Program (FRIP) will provide funding to support the replacement of HFC-based equipment with climate-friendly refrigeration equipment. We would be

pleased to support the planning and implementation of the proposed grant program in New York, bringing lessons learned, industry connections, and guidance to maximize the success of this critically important program.

While NASRC's experience can contribute most effectively to Measure 2 in the application, we support the application in full. Each component of this application has the potential to transform New York's communities and create lasting reductions in greenhouse gas emissions and other pollutants. These proposed programs, when implemented together, will ensure that investments in emissions reductions also support more resilient public services and buildings.

We strongly endorse this application and look forward to seeing these programs implemented in New York State. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle Wright", with a stylized flourish at the end.

Danielle Wright
Executive Director
NASRC