



COMMENTS ON THE CLCPA DRAFT SCOPING PLAN

by Joanna D. Underwood, Founder & Board Member of Energy Vision
Peekskill, NY - May 12, 2022

I am Joanna Underwood, founder of the environmental NGO Energy Vision, noted for its expertise on technologies that can accelerate the US shift away from fossil fuels and combat climate change. I want to comment on the need for the Scoping Plan to retain and highlight the anaerobic digestion of organic wastes – an essential strategy if New York’s ambitious goal of reducing its greenhouse gases 85% by 2050 is to be achieved with the added benefit of improving air quality for disadvantaged communities.

35% of New York’s greenhouse gases are methane, which, on a twenty-year timeline, are 84 times more potent in climate warming than CO₂. And I note that, according to a 2021 IPCC report by leading climate scientists, methane emissions to our atmosphere globally are the greatest immediate threat to our future and must be cut almost in half within the decade.

Neither the CLCPA’s 2050 goal nor the global and US goal of cutting methane 30% by 2030 can be reached without tackling methane’s major sources. Almost half of the State’s methane (46%) is emitted by rotting organic materials in landfills, at wastewater plants and in agricultural manures.

By processing organic wastes in “airless” digester tanks, a commercial strategy TODAY, methane biogases don’t escape to worsen climate change, and there are many other benefits:

*Organic wastes, long disposed of at high cost as garbage, become a valuable renewable energy resource, helping achieve the goal of the state’s 2019 landfill diversion mandate.

*Renewable Natural Gas, made by refining the methane biogases, is the lowest carbon fuel available today. It is even net carbon negative when used to displace high carbon diesel in heavy duty bus and truck fleets. Electric battery heavy duty vehicles (even if they were economic or technologically reliable which they are not) can never achieve this.

*Replacing polluting diesel in fleets with RNG fuel cuts lung damaging NO_x and particulate emissions, improving air quality for disadvantaged communities in areas with major truck traffic.

*The liquid/solid materials left in digesters after gas extraction can replace chemical fertilizers.

*Based on NY’s known organic waste resource, we could deploy 50+ digester systems across the state, which would require substantial private sector investment and create thousands of permanent jobs in a home-grown renewable energy industry which is emerging across the country, but not yet here in NY.

This anaerobic digestion strategy actually addresses some of our State’s key environmental and economic challenges. Almost every country in the world embraces anaerobic digestion as a major GHG reduction strategy. It is time for New York to do so as well. Thank you.

Climate Action Council Proposed Scoping Plan
NYPIRG Testimony on
Electric Vehicles, EV Charging Stations and Battery Storage

The transportation sector is the second largest emitter of greenhouse gas emissions in New York State.¹ Zero-emission electric vehicles (EVs) play a critical role in the State's efforts to reach its progressive climate change goals.

We support a goal in the Scoping Plan of at least a third of cars (3+ million) being EVs by 2030. According to NYSEDA, there are only around 55,000 EVs in New York.² *Therefore, we urge the CAC to include specific legislative recommendations in the Scoping Plan to prioritize timely action by the NYS Legislature and the Governor.*

S.7406-A (Krueger) and A.3179-C (Fahy) seeks to align New York's construction and building code policy with the CLCPA by mandating the installation of EV charging stations and/or infrastructure across the state during new building construction or rehabilitation.

The New York Power Authority has failed to install EV chargers where they are most needed by the state's registered EVs, leaving nearly half of the state's counties without any NYPA-installed charging stations, according to an audit by the State Comptroller.³ The Charge NY 2.0 program in 2018 planned to install 10,000 public charging stations by 2022, *however, "despite the allocation of significant funding, NYPA has fallen short on fulfilling its EV program goals."*⁴

California leads the nation with more than 13,000 public charging stations, and New York is far behind with less than 3,000 charging stations statewide.⁵ Also, since California has about double the population of New York, with over 500,000 EV cars, if adjusted for population, it is *more than four times ahead of our state.*⁶

The passage of this bill would set the State on the right track and effectively accelerate EV charging station infrastructure development which is essential to successfully combat the climate crisis.

The Scoping Plan also needs to fund research and development of short term (8 hours or under) and longer term (several days) battery storage and support the acquisition of batteries. The Climate Act requires the state to boost its 2030 battery storage goals to at least 4,200 MW. Battery storage is critically important to decarbonizing our lives, meeting peak energy use demands, supporting a resilient grid, and keeping consumer costs affordable.

¹ Department of Environmental Conservation, *Summary Report 2021 NYS Statewide GHG Emissions Report*, Pg. 11, 2021, https://www.dec.ny.gov/docs/administration_pdf/ghgsumrpt21.pdf

² NYS Energy Research & Development Agency, <https://www.nyserda.ny.gov/All-Programs/chargenyl/support-electric/map-of-ev-registrations>

³ NYS Comptroller News Release, 2/24/22, <https://www.osc.state.ny.us/press/releases/2022/02/dinapoli-new-york-power-authoritys-installation-electric-vehicle-chargers-years-behind-schedule>

⁴ Ibid.

⁵ U.S. Department of Transportation, *Earth Day 2021 Arrives as U.S. Electric Vehicle Sales Continue to Grow*, 4/21/21. <https://www.bts.gov/data-spotlight/electric-vehicle-use-grows>

⁶ California Energy Commission, <https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/vehicle-population>