



ORGANIZING *for* HEALTH *and* JUSTICE

The Clean Air Coalition of WNY
52 Linwood Avenue
Buffalo NY 14209

June 23, 2022

Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

To the Members of the Climate Action Council of NY -

We, the undersigned, are members and supporters of The Clean Air Coalition of WNY, and we strongly support Scenario Three of the Plan and a robust immediate implementation of the CLCPA with healthy state funding, but we feel there are areas where the plan can be strengthened.

We want to see our communities made whole by cleaning up every single brownfield from legacy industries, with Community Advisory Groups through the DEC such as the one currently in practice at Tonawanda Coke sharing insight and feedback on the cleanup and communicating with the public, and the responsible industries footing the cleanup costs.

We feel that the lack of emphasis on brownfield cleanups misses a key opportunity as a potential climate change resiliency program, especially given the growing risks that flooding presents in spreading contaminants from these sites, and that cleaned up brownfields on waterfront areas can potentially serve as floodwater mitigation buffer zones while also simultaneously creating public green spaces.



ORGANIZING *for* HEALTH *and* JUSTICE

We want assurances that the implementation will not only be green but also just - specifically, we want to see a Worker and Community Assurance Fund, which would provide direct support to fossil fuel-dependent workers across sectors as well as to communities who rely on fossil-fuel-dependent industries. Support should include wage replacement and pension support for displaced workers as well as expanded funding for lost tax base to municipal and county governments as well as school districts. A similar program is in place in Tonawanda NY to help workers and communities in the transition due to the closure of the Huntley coal-fired power plant.

We feel that stronger language must be used for labor standards. Instead of stating that "labor standards should be further evaluated and enhanced," the Scoping Plan must lay out policies requiring prevailing wage and benefits, project labor agreements, benchmarks for local hire. We also feel that community benefits agreements should be required for any projects that use State funds or take place on State property.

The State should provide direct funding for training, workforce development, apprenticeship, and pre-apprenticeship programs across sectors (e.g. training for public transit workers, school bus workers, and waste haulers on electric vehicles; training for buildings workforce on new manufacturing methods and construction approaches to improve building envelopes; and training for fossil fuel industry employees on clean energy technology). This should include funding (wage coverage) to support worker attendance at existing training courses.

Finally, we strongly support an immediate moratorium on proof-of-work blockchain mining using fossil fuel-based power, and strongly recommend penalizing the re-firing of shuttered fossil fuel power generation stations in environmental justice communities by private industry, especially in light of the pressure from private industry to re-use these stations utilizing false solution technologies like so-called "renewable" methane gas.



ORGANIZING *for* HEALTH *and* JUSTICE

We have not just an an opportunity with this plan to undo the past environmental injustice harms on our communities, but a mandate to succeed - despite what the fossil fuel industry may say about keeping “all options on the table”, the only real choice that is still before us is to pursue a regenerative and renewable economy or foist suffering upon ourselves and our children.

We are excited for the next steps as the CLCPA moves from legislation to regulatory action and direct services to NYS residents. Thank you for all your work to develop this plan.

Signed,

The Members and Supporters of the Clean Air Coalition of WNY, 52 Linwood Avenue Buffalo NY 14209, including the following undersigned individuals

Bridge Rauch, 35 Parkdale Ave, Buffalo New York 14213

Ariane Fulk, 44 Ramsdell Ave, Buffalo New York 14216

Robert Hirsch, 1554 Allenton Place, Grand Island New York 14072

Jennifer Carman, 49 Fargo Ave, Apt 2, Buffalo New York 14201

QuasieClarke, 7620 Dean Brown Dr, Niagara Falls, New York 14304

Jamal Davis, 215 Stevens Ave, Buffalo New York 14215

Holly Nowak, Buffalo New York, 14225

Rob Walsh 63 Tioga St, Buffalo New York, 14216

Sarah Costlow, 8735 Hunters Creek Rd, Holland New York 14080

Shirley Sarmiento, 205 marine dr. apt 4d, 4d, Buffalo, New York, 14202

Juli Parker, 257 Lafayette Ave Apt 201, Buffalo New York, 14213

Cynthia Silverstein, 925 Delaware Ave, Buffalo New York, 14209



ORGANIZING *for* HEALTH *and* JUSTICE

Thelma Collins, 101 Hamilton Blvd, Kenmore New York, 14217-1948

Seamus Gallivan, 400 Porter Ave, Buffalo New York 14201

Melissa Cirina, Buffalo New York, 14216

Lindsay Amico 305 University Ave, Buffalo New York 14223

Carrie Gardner, 1515 Colvin Blvd, Buffalo New York 14223

Sarah Costlow, 8735 Hunters Creek Rd, Holland New York 14080

Sean Fallon 2143 E Oakfield Rd, Grand Island New York 14072