



New York State Catholic Conference

THE OFFICIAL PUBLIC POLICY VOICE OF THE CATHOLIC CHURCH IN THE EMPIRE STATE

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Draft Scoping Plan Comments
NYSERDA
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The New York State Catholic Conference submits the following comments on the draft Scoping Plan developed by the Climate Action Council, which was created by the Climate Leadership and Community Protection Act of 2019 (CLCPA).

General Position of the Catholic Church

The perspective of the Catholic Church with respect to the environment is encapsulated in the 2015 encyclical letter of Pope Francis, *Laudato Si'*, on the Care for the Common Home. This landmark encyclical acknowledges our relationship with our common home – the earth – and “the harm that we have inflicted on her by our irresponsible use and abuse of the goods with which God has endowed her.”

In fact, the Church has expressed its concern over the ecological damage caused by unchecked human activity for more than 50 years, particularly during the pontificates of the last three popes – Francis, Benedict XVI, and St. John Paul II. The Church’s statements on ecological harm acknowledge and have been enriched by the reflections of numerous scientists, philosophers, theologians, and civic groups. Generally speaking, *Laudato Si'* calls for us to work together for sustainable development with a critical emphasis on reversing environmental degradation that affects the poorest among us.

NYS Catholic Conference Position on the Draft Scoping Plan

In accordance with this framework, the New York State Catholic Conference applauds the State for its strong commitment to reducing greenhouse gas emissions and advancing climate justice. These are worthy goals. It is not our role to comment on the intricate technical details of the draft Scoping Plan, since those issues are best decided by the experts in these areas. Specific matters of importance to the Catholic Conference are articulated below:

- **The State’s implementation of climate initiatives must ensure the protection of the most needy.** In line with the Climate Justice Working Group (CJWG) created pursuant to the CLCPA, the Catholic Conference urges the State to advance strategies that recognize the existing and devastating consequences of environmentally damaging activities on the poorest members of our State. Like the CJWG, the Catholic Conference supports the concept of equity in land use planning and development and sustainable use and protection of natural resources.

- **The costs of implementing climate initiatives are significant and must be done with care.** Catholic dioceses around New York State rely upon an extensive physical infrastructure to minister to their parishioners. The churches, schools, shrines, historic sites, camps, cemeteries and offices are all integral to our ability to implement our apostolic mission. To the best of our ability, we are integrating environmentally sustainable technologies in our operations of these facilities.

For example, in 2017, St. Patrick’s Cathedral in New York City activated a massive geothermal plant which has been installed under the Cathedral. This project, the most extensive in the Cathedral’s history, cost \$35 million and allowed St. Patrick’s – the symbolic seat of the Catholic Church in the United States – to demonstrate its leadership in the use of an environmentally sustainable energy source.

Constructing this geothermal system was made possible only by the generosity of St. Patrick’s parishioners and supporters. The necessity of relying upon our parishioners for financial support is true of all of the capital projects undertaken by our parishes and diocesan offices. This financial limitation constrains the ability of Catholic dioceses to undertake capital projects as quickly as we would like and simultaneously limits our ability to swiftly implement the goals articulated by the draft Scoping Plan. The Catholic Conference urges the State to carefully consider the economical constraints of religious institutions, just as it must respectfully acknowledge the ability of homeowners and businesses to pay for its called-for upgrades and conversions to new energy sources.

- **The State’s Scoping Plan must address the important need for climate resiliency.** While the draft Scoping Plan acknowledges the importance of increasing resiliency to future storms on the community, local and county level, the lack of an emphasis on resiliency (except for the issue of grid resiliency) is a serious oversight in the draft plan. We have not forgotten the devastation caused by storms such as Sandy (2012) or Ida (2021), or the devastation caused by the historic high-water levels on Lake Ontario (2017 and 2019). These events caused significant damage to the homes and businesses of our parishioners and left many of us in the dark for days on end. Given the unknowable path of future storms, we believe that the State must place a substantial emphasis on implementing resiliency projects.

Given the availability of resiliency funds pursuant to the Bipartisan Infrastructure Law (aka the Infrastructure Investment and Jobs Act of 2021) and the potential for voter approval of a \$4.2 billion Environmental Bond Act in November, we believe that both the Scoping Plan and the State should develop a publicly available plan to address resiliency needs. Emphasis should be placed on projects involving nature-based features, particularly in disadvantaged communities, that will protect our people and our structures from future damages while also benefiting our ecosystems.

- **The Scoping Plan must accurately reflect the essential issue of grid reliability.** The Catholic Conference wishes to express reservations with a transition to reliance primarily or solely on electric generation unless the reliability of the electric grid can be assured. Service interruptions or inadequate sources of electricity, such as when solar and wind

resources are unavailable for extended periods of time, will cause serious harm to diocesan facilities and, more importantly, New York's citizens – particularly the most vulnerable.

While the Catholic Conference appreciates the need to proceed quickly on actions to address climate change, we urge the State to act with deliberation on this important effort.

Thank you for providing us with the opportunity to comment on this important issue.