

Via email to scopingplan@nyserda.ny.gov

June 30, 2022

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

Re: *Comments on the Climate Action Council Draft Scoping Plan*

Dear Members of the Climate Action Council:

Thank you for the opportunity to comment on the Climate Leadership and Community Protection Act (“CLCPA”) Draft Scoping Plan. The attached comments were written by a coalition of environmental, environmental justice, labor, and economic justice groups across New York State including New York Renews, People United for Sustainable Housing Buffalo (“PUSH Buffalo”), the New York City Environmental Justice Alliance, Alliance for a Greater New York, Alliance for a Green Energy Economy, Sierra Club, Environmental Advocates New York, and Earthjustice.¹

The comments are divided into eleven chapters: Agriculture & Forestry, Buildings, Economy-wide Measures, Electricity Generation, Energy Intensive and Trade-Exposed Industry, Gas Transition, Just Transition, Land Use & Local Government, Public Health, Transportation,

¹ We submit these comments on behalf of Acadia Center, All Our Energy, Alliance for a Greater New York, Alliance for a Green Economy, Brookhaven Landfill Action and Remediation Group, Catskill Mountainkeeper, Clean Air Coalition of WNY, Climate Reality Project, Finger Lakes Greater Region NY Chapter, Climate Reality Project, Hudson Valley and Catskills Chapter, Climate Reality Project, NYC, Climate Reality Project, Westchester NY Chapter, Climate Reality Project, Capital Region NY Chapter, Climate Reality Project, Western New York Chapter, Climate Reality Project, Long Island Chapter, Climate Solutions Accelerator of the Genesee-Finger Lakes Region, Coalition for Outreach, Policy & Education, Committee to Preserve the Finger Lakes, Community Food Advocates, CUNY Urban Food Policy Institute, Dryden Resource Awareness Coalition, Earthjustice, E2 (Environmental Entrepreneurs), Environmental Advocates New York, Fossil Free Tompkins, Friends of the Earth, Gas Free Seneca, Grassroots Environmental Education, Green Education and Legal Fund, GreenLatinos, HabitatMap, Hotshot Hotwires, Jobs to Move America, Long Island Progressive Coalition, Nassau Hiking & Outdoor Club, Natural Resources Defense Council, Network for a Sustainable Tomorrow, New York City Environmental Justice Alliance, New York Clinicians for Climate Action, New York Renews (“NY Renews”), New York State Public Health Association, North Brooklyn Neighbors, Northeast Organic Farming Association of New York, Inc., People of Albany United for Safe Energy, PUSH Buffalo, Rewiring America, Riverkeeper Inc., Roctricity, Sane Energy Project, Seneca Lake Guardian, Sierra Club, South Shore Audubon Society, Sustainable Finger Lakes, Tri-State Transportation Campaign, Union of Concerned Scientists, University Network for Human Rights, UPROSE, WE ACT for Environmental Justice, and 350NYC. As indicated in the signature blocks below, some organizations have signed onto the whole submission while others have signed onto certain chapters based on their particular interests and areas of expertise.

and Waste. While each chapter covers a different sector or issue addressed by the Draft Scoping Plan, certain principles underpin our comments throughout this submission.

First, environmental justice is paramount. The State must prioritize the health and welfare of low-income communities and communities of color at the frontlines of the climate crisis. The Final Scoping Plan should include strong public health guidelines, labor standards, and recommendations to frontload climate investments, emissions reductions, and workforce training programs in Disadvantaged Communities.

Second, electrification is essential to decarbonizing the transportation and building sectors. Electrification generates enormous public health and economic benefits in addition to achieving mandated greenhouse gas reductions. The CLCPA's 2030 economy-wide emission limits are fast approaching. New Yorkers need a plan that will maximize near-term emission reductions by rapidly accelerating deployment of all viable zero-emission solutions, which will eliminate local exposure to toxic co-pollutant emissions. The technology is feasible today: we simply need the political will to shift public and ratepayer investments from unsustainable systems to electrification.

Third, the State must reject false solutions including offsets and alternative fuels such as biomethane, biofuels, and hydrogen. Production and combustion of these fuels results in significant greenhouse gas emissions and co-pollutants—which create health threats that disproportionately impact communities of color and low-income communities—and will only delay the necessary transition to electrification. Instead, we call for a plan that transitions away from an extractive, fossil fuel-based economy to the maximum extent feasible. Any determinations that a given sector is hard-to-electrify today must be adequately justified through a rigorous technological determination, rather than the appeals of incumbent industries. Moreover, such determinations should be revisited periodically given the rapid development of zero-emission technologies.

Thank you for your time and attention. We look forward to continuing the conversation as the Climate Action Council develops the final scoping plan by January 1.

Respectfully submitted,

Acadia Center (All Chapters)

All Our Energy (Buildings, Economy-wide Measures, Electric Sector, Energy Intensive and Trade-Exposed Industry, Gas Transition, Just Transition, Transportation, Waste Chapters)

Alliance for a Greater New York (Just Transition Chapter)

Alliance for a Green Economy (All Chapters)

Brookhaven Landfill Action and Remediation Group (All Chapters)

Catskill Mountainkeeper (Agriculture & Forestry, Economy-wide Measures, Electric Sector, Energy Intensive and Trade-Exposed Industry, Gas Transition, Just Transition, Land Use & Local Government, Public Health, Transportation, Waste Chapters)

Clean Air Coalition of WNY (All Chapters)
 Climate Reality Project, Capital Region NY Chapter (All Chapters)
 Climate Reality Project, Finger Lakes Greater Region NY Chapter (All Chapters)
 Climate Reality Project, Long Island Chapter (All Chapters)
 Climate Reality Project, NYC (All Chapters)
 Climate Reality Project, Westchester NY Chapter (All Chapters)
 Climate Reality Project, Western New York Chapter (All Chapters)
 Climate Reality, Hudson Valley and Catskills Chapter (All Chapters)
 Climate Solutions Accelerator of the Genesee-Finger Lakes Region (Buildings, Economy-wide Measures, Electric Sector, Energy Intensive and Trade-Exposed Industry, Gas Transition, Just Transition, Land Use & Local Government, Public Health, Transportation, Waste Chapters)
 Coalition for Outreach, Policy & Education (Energy Intensive and Trade-Exposed Industry Chapter)
 Committee to Preserve the Finger Lakes (All Chapters)
 Community Food Advocates (All Chapters)
 CUNY Urban Food Policy Institute (All Chapters)
 Dryden Resource Awareness Coalition (Energy Intensive and Trade-Exposed Industry Chapter)
 E2 (Environmental Entrepreneurs) (Just Transition Chapter)
 Earthjustice (All Chapters)
 Environmental Advocates NY (All Chapters)
 Fossil Free Tompkins (All Chapters)
 Friends of the Earth (Agriculture & Forestry Chapter)
 Gas Free Seneca (All Chapters)
 Grassroots Environment Education (Energy Intensive and Trade-Exposed Industry, Land Use & Local Government, and Public Health Chapters)
 Green Education and Legal Fund (All Chapters)
 Green Latinos (Just Transition, Transportation Chapters)
 HabitatMap (All Chapters)
 Hotshot Hotwires (All Chapters)
 Jobs to Move America (Economy-Wide Measures, Just Transition, Transportation Chapters)
 Long Island Progressive Coalition (All Chapters)
 Nassau Hiking & Outdoor Club (All Chapters)
 Natural Resources Defense Council (Agriculture & Forestry Chapter)
 Network for a Sustainable Tomorrow (All Chapters)
 New York City Environmental Justice Alliance (Land Use & Local Government, Public Health, Transportation Chapters)
 New York Clinicians for Climate Action (All Chapters)
 New York State Public Health Association (Public Health Chapter)
 North Brooklyn Neighbors (All Chapters)
 Northeast Organic Farming Association of New York, Inc. (NOFA-NY) (Agriculture & Forestry)
 NY Renews (All Chapters)
 People of Albany United for Safe Energy) (All Chapters)

PUSH Buffalo (Buildings, Electric Sector, Gas Transition, Energy Intensive and Trade-Exposed Industry, Just Transition, Land Use & Local Government, Public Health, Transportation Chapters)
Rewiring America (Buildings Chapter)
Riverkeeper Inc. (Agriculture & Forestry, Electric Sector, Land Use & Local Government Chapters)
Roctricity (All Chapters)
Sane Energy Project (Buildings, Energy Intensive and Trade-Exposed Industry, Gas Transition, Just Transition, Public Health Chapters)
Seneca Lake Guardian (All Chapters)
Sierra Club (Agriculture & Forestry, Buildings, Energy Intensive and Trade-Exposed Industry, Electric Sector, Gas Transition, Land Use & Local Government, Public Health, Transportation, Waste Chapters)
South Shore Audubon Society (All Chapters)
Sustainable Finger Lakes (Agriculture & Forestry, Buildings, Economy-wide Measures, Electric Sector, Energy Intensive and Trade-Exposed Industry, Just Transition, Land Use & Local Government, Waste Chapters)
Tri-State Transportation Campaign (Just Transition, Transportation Chapters)
Union Of Concerned Scientists (Transportation Chapter)
University Network for Human Rights (All Chapters)
UPROSE (All Chapters)
WE ACT for Environmental Justice (All Chapters)
350NYC (Buildings, Transportation, Waste Chapters)

cc: Doreen Harris, President and CEO, NYSERDA
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Marie Therese Dominguez, Commissioner, New York State Department of Transportation
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Hope Knight, Commissioner and President & CEO of Empire State Development
Justin Driscoll, Acting President and CEO, New York Power Authority
Roberta Reardon, Commissioner, New York State Department of Labor
Rory Christian, CEO and Chair, New York State Public Service Commission
Robert J. Rodriguez, Acting Secretary of State, New York State Department of State
RuthAnne Visnauskas, Commissioner and CEO, New York State Homes and Community Renewal
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Donna L. DeCarolis, President, National Fuel Gas Distribution Corporation
Gavin Donohue, President and CEO, Independent Power Producers of New York

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Anne Reynolds, Executive Director, Alliance for Clean Energy New York

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