



## Just Transition

### I. Introduction

In order to successfully reach New York’s climate mandates as outlined in the Climate Leadership and Community Protection Act (“CLCPA”), the State must prioritize a just transition not only for our disadvantaged communities (“DAC”), but also for our workers. By putting our workers at the forefront of the transition, New York can improve living standards for workers and communities, tackle racial and economic injustices, and promote economic development while reducing greenhouse gas emissions.

According to the State’s research, New York’s green workforce is expected to grow by 38%, or 189,000 net jobs, by 2030.<sup>1</sup> By 2050, these numbers will jump to 54% and at least 268,00 net jobs.<sup>2</sup> Although New York may lose up to 22,000 jobs in fossil fuel sectors by 2030, for every one job displaced, the State can expect to see ten new jobs in its place.<sup>3</sup> Investing in a

<sup>1</sup> Just Transition Working Group, *2021 Jobs Study* 6 (2021), <https://climate.ny.gov/-/media/Project/Climate/Files/JTWG-Jobs-Report.ashx>.

<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

green economy not only helps grow the number of overall jobs in clean energy industries but will also specifically help grow middle-class jobs. In fact, the number of jobs with family-sustaining wages (between \$28-\$37 dollars per hour) is expected to increase by 6% while the proportion of low-wage jobs shrinks.<sup>4</sup> Moreover, each region of New York State stands to gain new green jobs with family-sustaining wages.<sup>5</sup>

In addition to strengthening New York's middle class, the growth of green jobs has the power to create an equitable, accessible, empowered green workforce that reflects the makeup of our communities. The growth of green jobs represents an opportunity to create long-term career opportunities for women, Black, Indigenous, and People of Color ("BIPOC"), justice-impacted individuals, unemployed individuals, members of disadvantaged communities, and other traditionally underrepresented groups. It will also create job opportunities for workers at all education levels at nearly equal rates,<sup>6</sup> further demonstrating the potential accessibility of the green energy economy.

In order to deliver on these goals, however, the Final Scoping Plan must lay out a fulsome just transition roadmap. A robust just transition for New York State will:

- Guarantee a fossil-free future;
- Adequately support existing workers in fossil fuel-dependent industries;
- Prepare new workers for large scale growth across clean energy industries;
- Capitalize on opportunities to innovate and expand good green jobs in New York; and
- Unlock possibilities of re-prioritizing workers; and
- Remediate the legacy of structural inequities through New York's transition to a green economy.

## II. Just Transition

The just transition chapter of the Scoping Plan includes many provisions essential to delivering on a just transition for communities and a clean, green, fossil fuel free economy with high-quality union jobs accessible to all. Most notably, the just transition principles provide a framework for a transition that is collaborative, community-centered (particularly in reference to disadvantaged communities), that seeks to uplift equity, and that emphasizes the need to create

---

<sup>4</sup> *Id.* at 8.

<sup>5</sup> *Id.* at 7.

<sup>6</sup> See generally Robert Pollin et al., Univ. Mass.-Amherst, *Clean Energy Investments for New York State: An Economic Framework for Promoting Climate Stabilization and Expanding Good Job Opportunities* (2017), <https://peri.umass.edu/publication/item/1026-clean-energy-investments-for-new-york-state-an-economic-framework-for-promoting-climate-stabilization-and-expanding-good-job-opportunities>.

high-quality, family-sustaining jobs across all sectors in the new green economy. Additional highlights of the chapter include the recognition of the need for accessibility in workforce and career trainings – including multi-lingual trainings, online and in-person options, and trainings at varied times – the suggestion to combine green economy workforce development with wraparound services and additional workforce trainings (e.g. OSHA or EPA trainings); the need to fund job recruitment, training, hiring, and retention for DAC, minority- and women-owned business enterprises, service-disabled veteran-owned businesses, co-ops, and employee-owned businesses; and the need to incentivize stable employment over the gig economy.

However, despite its strengths, the just transition chapter and the Draft Scoping Plan (“DSP”) as a whole lack substantive proposals to ensure that these principles are translated into the reality of New York’s transition off fossil fuels. Moreover, the DSP falls short of proposing discrete actions the State should take to ensure that existing and new workers are not only protected during this transition but benefit from it as well.

#### **A. The Final Scoping Plan must advocate for specific protections for existing workers in fossil-fuel-dependent industries.**

In order to deliver on a just transition to a fossil-free economy, New York must first and foremost commit to protecting those workers whose livelihoods are dependent on the fossil fuel industry. According to the jobs study conducted pursuant to the Climate Act, up to 22,000 jobs will be displaced in New York by 2030 due to the decommissioning of the fossil fuel industry.<sup>7</sup> Job loss is expected predominantly in the following sub-sectors: Natural Gas Generation, Natural Gas Distribution, Fossil Fuel, Nuclear, Petroleum Fuels, Conventional Fueling Stations, and Vehicle Maintenance.<sup>8</sup> In the Draft Scoping Plan, potential policy interventions to support displaced workers are primarily discussed under subsection “Direct Displaced Worker Support” of the just transition chapter. The recommendations focus on potential retraining opportunities for displaced workers including continuing education, registered apprenticeship programs, certifications, and licensing in trades and professions in clean energy industries. While retraining is an important part of the displacement support puzzle, our workers need more and better direct support mechanisms.

To ensure that both existing and retiring fossil fuel industry workers as well as communities dependent on the fossil fuel industry for their economic development are directly supported, the Final Scoping Plan (“FSP”) should recommend the establishment of a Workforce and Community Assurance Fund. The purpose of the fund should be to provide:

- Pension support and wage replacement for displaced fossil fuel industry workers matching their current salaries;

---

<sup>7</sup> N.Y. Climate Action Council, *Draft Scoping Plan* (“DSP”) 50 (2021), <https://climate.ny.gov/-/media/Project/Climate/Files/Draft-Scoping-Plan.pdf>.

<sup>8</sup> Robert Pollin et al., Univ. Mass.-Amherst, *Clean Energy Investments for New York State: An Economic Framework for Promoting Climate Stabilization and Expanding Good Job Opportunities* 10 (2017), <https://peri.umass.edu/publication/item/1026-clean-energy-investments-for-new-york-state-an-economic-framework-for-promoting-climate-stabilization-and-expanding-good-job-opportunities>.

- Expanded funding for lost tax base to local governments and school districts in communities reliant on fossil fuel industry for their economic development;
- Grants to communities that host fossil fuel infrastructure and/or are home to fossil fuel-dependent industries for energy and transition planning; and
- Employer decarbonization support to avoid job losses or wage and benefits cuts.

The FSP should also recommend the usage of Workforce Assessment Planning where fossil fuel plants are decommissioned. A Workforce Assessment Plan is a tool to keep impacted workers informed on job creation and losses, give impacted workers a dedicated space to contribute to the transition process, and help accommodate workers' career and retirement plans into transition planning.

Finally, for transitioning industries such as the transportation sector, the Final Scoping Plan should recommend mechanisms to preserve existing workers' rights, benefits, collective bargaining membership, and employment status.<sup>9</sup> Efforts to electrify public fleets should include planning and assessment of potential workforce impacts and opportunities to mitigate those impacts.

**B. The Final Scoping Plan must require strong labor standards on State-funded projects and projects that take place on State property.**

As the State has committed its resources to developing renewable energy projects, labor advocates have fought hard to include labor standards on these projects. These standards include but are not limited to: provisions such as prevailing wage requirements, project labor agreements, and labor peace agreements. As the State continues the transformation to a fossil-free economy, it should strengthen its support for labor standards across the green economy, starting with the recommendations within the Scoping Plan.

Under the subheading "Evaluation of Labor Standards," current language on labor standards in the Draft Scoping Plan reads as follows: "labor standards should be further evaluated and enhanced [...] [and] [w]here appropriate, feasible, and permitted by law, project labor and community workforce agreements, as well as local and targeted hiring provisions, should be explored."<sup>10</sup> The FSP must be much more explicit in its support of labor standards, including recommending the requirement of prevailing wage, benefits, project labor agreements ("PLA"s), local hire provisions, and community benefits agreements. In particular, under Section 224-a of New York Labor Law, prevailing wage is required on construction work and engineering consulting services for renewable energy systems, renewable heating or cooling systems, or energy storage systems equal to or greater than five megawatts. The FSP should explicitly recommend lowering this threshold to extend labor standards on a wider set of renewable energy, energy storage, and energy efficiency projects. Beyond this, the FSP should advance a recommendation to require the above-referenced labor standards on all projects

---

<sup>9</sup> An example of such language can be found in New York Education Law § 3638(5)(a)-(b).

<sup>10</sup> DSP at 44.

targeted to achieving CLCPA goals that receive State funding or take place on State property. Expanding the reach of labor standards in the green energy economy will be instrumental in helping raise workers' living standards, grow the labor movement, and guarantee job opportunities for disadvantaged community members.

### **C. The Final Scoping Plan must focus on additional opportunities to incentivize job creation in New York's clean energy economy**

While the energy transition already promises to bring hundreds of thousands of new jobs to the State, there are still more opportunities for job growth that are currently under-explored in the DSP. In particular, the FSP should increase its focus on incentivizing the creation of good jobs along the manufacturing and supply chain.

The FSP must lay out specific policies for how the State can create opportunities to direct its purchasing and contracting power in a way that uses State funds to (a) incentivize job creation along the clean energy, clean transportation, and zero-carbon supply chains; and (b) prioritize high-road employers, i.e., employers that foster jobs with family-sustaining wages, benefits, and investments in employee development. These policies should include, but are not limited to, Buy American provisions and best-value procurement. Buy American provisions would require that certain clean energy, clean transportation, and/or low carbon components utilized in State-funded projects must be made, produced, and assembled in the United States. Best-value procurement is a procurement method that evaluates bids on factors outside of cost, for instance, weighing local job creation, job training for disadvantaged communities, or other additional equity and climate goals alongside cost. Recommending such policies in the FSP will allow New York State to better deliver on the just transition values laid out in its just transition chapter by intentionally supporting prevailing wage and benefits, local hiring provisions, and job access for traditionally excluded populations. Another benefit of utilizing State funding in the renewable energy transition is that it will ensure that a larger proportion of the resources put into building out New York's green energy economy are bound to the goals and mandates within the CLCPA—for instance, the goal of having 40% of funds invested into disadvantaged communities.

The FSP should also identify opportunities to conduct competitive solicitations for bulk purchasing or centralized procurement contracts for clean energy, clean transportation, or zero-carbon products. Well-designed State purchasing programs could create strong price competition while also providing incentives to manufacturers to create high-quality jobs in New York.

### **D. The Final Scoping Plan should outline discrete strategies the State will pursue to support workforce development.**

According to the *2021 Jobs Study*, over 200,000 new workers will need to be deployed across at least 20 different sub-sectors in the electricity, fuels, buildings, and transportation sectors.<sup>11</sup> The *2021 Jobs Study* also states that: “[E]xpanding the pipeline for the growing workforce will require considerably more people than simply transitioning over those that have

---

<sup>11</sup>Just Transition Working Group, *2021 Jobs Study* 6 (2021), <https://climate.ny.gov/-/media/Project/Climate/Files/JTWG-Jobs-Report.ashx>.



lost employment opportunities in displaced sectors.”<sup>12</sup> Given this massive green energy workforce expansion, the FSP should detail how the State should provide direct support through funding and additional resources for training, workforce development, apprenticeship, and pre-apprenticeship programs across sectors and subsectors. Direct support should also include mechanisms to facilitate worker attendance at existing training courses (for example, wage coverage for workers during training hours). Additionally, the FSP should include language to ensure coordination between the State and cities, counties, transit agencies, or other public bodies that support workforce development to guarantee these programs are adequately supported and attended. It should also include language encouraging such entities to adopt the use of employment plans that map out projected job creation, job displacement, skills gaps, and retraining needs/opportunities for transitioning sectors.

#### **E. The Final Scoping Plan should expand the scope of workers who are focalized in just transition materials put forth by the State.**

The workforce composition of many different sectors of New York’s economy are predicted to shift as the State transitions. This will include intra-sector growth and displacement. As an example, under the electricity sector, while the workforce in sub-sectors—including solar, offshore and onshore wind, hydropower, hydrogen, distribution, biomass, transmission, and storage—is expected to grow, that in sub-sectors such as natural gas and fossil fuel is expected to shrink.<sup>13</sup> As currently written, the DSP focuses primarily on support for displaced workers in fossil fuel energy generation. While determining how to support workers directly employed by the fossil fuel industry is essential, this emphasis is not reflective of the full range of workers facing potential displacement as the State transitions to a green economy. To adequately address these complexities, the FSP should expand its focus on just transition to address the entirety of shifting workforce dynamics, exploring job impacts and opportunities in all sectors both within Chapter 7 and throughout the FSP as a whole.

### **III. Sector-by-Sector Just Transition Analysis**

#### **A. Transportation**

New York State is a transportation hub for the U.S. It is the largest producer of transit industry equipment, contributing \$3.6 billion in economic impact and employing over 20,000 individuals.<sup>14</sup> New York is also home to the nation's largest transit agency: The Metropolitan Transportation Authority-New York City Transit.<sup>15</sup> Given this context, New York is well-positioned to become a hub of electrical vehicle manufacturing—specifically electric buses—as well as leading the way on expanding and decarbonizing public transportation.

---

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> *Transportation Equipment: The Transportation Equipment Industry Is Moving Forward in New York State*, N.Y. State Empire State Dev., <https://esd.ny.gov/industries/transportation-equipment> (last visited May 16, 2022).

<sup>15</sup> Am. Pub. Transp. Ass’n, *2021 Public Transportation Fact Book* 32 (72nd ed. 2021), <https://www.apta.com/wp-content/uploads/APTA-2021-Fact-Book.pdf>.

As the State dramatically increases the adoption of zero-emission vehicles (“ZEV”s) and equipment, it must guarantee that workers that manufacture, sell, operate, and maintain vehicle fleets statewide have access to the relevant job retraining, certifications, and workforce development to transition from fossil fuel technologies to zero-emission technologies. This will help to ensure job security for the existing transportation workforce. In addition to preserving existing jobs, the FSP should acknowledge and uplift this opportunity to incentivize job creation along the ZEV manufacturing and supply chain for passenger vehicles, medium- and heavy-duty vehicles, and non-road equipment. Importantly, research suggests that new jobs added associated with ZEV adoption—especially those jobs in electrical component manufacturing and charging infrastructure—will have nearly twice the average wages of displaced jobs in the transportation sector.<sup>16</sup> The FSP should therefore propose incentives for high-roads manufacturers and businesses in ZEV manufacturing and supply chain industries to bring their operations to New York.

Where the FSP provides recommendations for transitioning public transit fleets, it should identify intervention points where the State can (a) drive the adoption of ZEVs at the county and municipal level; and (b) protect existing jobs and support the development of new jobs. For instance, the FSP should direct the State to require public transit systems that receive operating assistance from the State to purchase only zero-emission vehicles using a best-value contracting framework by 2029. Alongside cost, this framework should weigh worker wages, benefits, and safety; the usage of (re)training and apprenticeship programs; climate goals; and community benefits agreements. Moreover, for those same public transit systems, the FSP should recommend that the State require the creation and implementation of workforce development reports that forecast potential jobs creation and displacement from the transition to a zero-emission fleet, identify workers’ skills gaps, and include a comprehensive (re)training plan for impacted employees in order to receive operating assistance monies.

When discussing strategies to support both public and private sector fleet transition, the FSP should also reference Buy NY provisions as a mechanism to maximize job creation in the clean transportation sector. In instances where the FSP recommends the establishment of public programs or public funding/financing mechanisms to support ZEV deployment—such as investing in ZEV charging or fueling infrastructure—these programs, funding opportunities, incentives, and/or subsidies should come with attached labor standards including prevailing wage, benefits, and project labor agreements (“PLAs”). Moreover, the FSP should include language that prioritizes the rollout of State resources to support fleet transition where they will provide the highest benefit to environmental justice communities as well as the highest labor benefits.

Finally, the FSP should include specific reference to the impact of the expansion of e-commerce mega warehouses on the State’s transportation emissions. Within this, the FSP should recommend that community benefits agreements be required where e-commerce mega warehouses are constructed or expanded and include language to limit the expansion of such

---

<sup>16</sup> Dana Lowell et al., M.J. Bradley & Associates, *New York Clean Trucks Program: An Analysis of the Impacts of Zero-Emission Medium- and Heavy-Duty Trucks on the Environment, Public Health, Industry, and the Economy* 5 (2021), [https://www.mjbradley.com/sites/default/files/NY\\_Clean\\_Trucks\\_Report.pdf](https://www.mjbradley.com/sites/default/files/NY_Clean_Trucks_Report.pdf).

warehouses in disadvantaged communities.

*i. T4. Customer Convenience and Service Connectivity*

Under this strategy, the Final Scoping Plan should integrate the Climate Justice Working Group’s (“CJWG”) recommendations into “Components of the Strategy” by recommending that the state explore measures to: to (a) hire members of disadvantaged communities in transit manufacturing by offering a credit to manufacturers for setting aside a proportion of jobs for them; and (b) utilize the expansion of public transit services as an opportunity to expand family-sustaining union jobs and opportunities for DAC.

**B. Buildings**

*i. B4. Scale Up Public Financial Incentives*

Under the strategy “Support community-scale solutions and community thermal systems,” the Final Scoping Plan should direct the State to explore mechanisms to leverage the aggregated nature of community-scale solutions and community thermal systems to support labor standards on non-utility-scale clean energy projects. It should also separate these two components and include stronger language on support for community thermal systems as these systems may provide an important jobs-creation mechanism for workers in the pipe trades currently employed by fossil fuel industries.

Additionally, under the strategy “Prioritize energy upgrades and resilience in public housing,” the FSP should enumerate specific policies that will uplift workforce training initiatives targeting public housing residents, including apprenticeship and pre-apprenticeship programs. This will help to build a pipeline of talent to be deployed in the green energy economy while also promising pathways to high-quality career employment to members of DACs. A recent report from the Worker Institute at the Cornell Industrial and Labor Relations School cites an apprenticeship established by District Council 9 of the International Union of Painters and Allied Trades that provides a career pipeline into union painting specifically tailored for New York City Housing Authority residents.<sup>17</sup> This program could serve as a statewide model and should be uplifted in the FSP.

*ii. B9. Support Innovation*

The FSP should make explicit reference to the need to give unions access to funding and/or additional resources needed to train workers on any new construction approaches or manufacturing methods transferred to and/or developed for the buildings sector to increase building resilience, facilitate grid-interactivity, and support building decarbonization solutions.

*iii. B10. Reduce Embodied Carbon from Building Construction*

When developing procurement specifications to help drive carbon reductions on State-funded new construction projects, the FSP should integrate best-value procurement and Buy NY standards into these procurement specifications. This will help support the development of high-

---

<sup>17</sup> Lara Skinner et al., Cornell Univ., *Climate for Change: A Climate Jobs Roadmap for New York City 9* (2022), <https://ecommons.cornell.edu/handle/1813/110948>.



roads jobs along the low-carbon building construction supply chain while simultaneously reducing embodied carbon in construction.

## C. Electricity

### *i. E1. Retirement of Fossil Fuel Fire Facilities*

The decommissioning of the State’s fossil fuel infrastructure will be one of, if not the primary, driver of any job displacement under a transition to a clean energy economy. As such, the principles of a just transition, as well as specific policy mechanisms to support a just transition, must take primacy in this strategy. Under resource planning, in outlining the steps needed to address the impacts on communities and workers, the FSP should include two key mechanisms outlined in Section II Subsection A of this document: the need for Workforce Assessment Planning in the process of retiring facilities and the establishment of a Worker and Community Assurance Fund to directly support displaced fossil-fuel industry workers and communities dependent on the fossil fuel industry for their economic development.

### *ii. E3. Facilitate Distributed Generation/ Distributed Energy Resources*

Currently, the State’s support of robust labor standards in renewable energy development is largely limited to utility-scale projects.<sup>18</sup> As the State explores mechanisms to facilitate the development of distributed energy generation and distributed energy resources, it must also determine leverage points to facilitate the creation of high-quality union jobs in these subsectors.

### *iii. E4. Deploy Existing Storage Technologies*

In providing increased funding for energy storage deployment and in addition to prioritizing funding for projects in frontline communities, the FSP should explicitly reference that funding mechanisms developed by the State should come with attached labor standards. These should include prevailing wages and benefits for workers as well as PLAs and labor peace agreements where possible.

### *iv. E7. Invest in Transmission and Distribution Infrastructure Upgrades*

Under the “Renewable Energy Zones” component, in creating a database to track the penetration of renewable energy in the state, the FSP should specify that the State should also track job creation from said renewable energy development. Moreover, the FSP should add a step to its outlined process to capture the jobs creation potential within each zone should the State pursue the establishment of Renewable Energy Zones.

### *v. E10. Explore Technology Solutions*

Finally, under Nuclear Generation, when evaluating the contribution of nuclear power to the 2040 energy mix, the Scoping Plan must also include language that will require the State to adequately consider and plan for the potential jobs impacts and worker transition needs alongside resource needs.

---

<sup>18</sup> See Section II Subsection B at 4 of these comments.

## **D. Industry**

### *i. 12. Low-Carbon Procurement*

The FSP should integrate the CJWG’s recommendation of implementing best-value procurement into the language regarding “Provide[ing] policy support” included in the DSP. Key elements of a low-carbon, best-value procurement framework as outlined by the CJWG include weighing climate mitigation efforts as well as exploring workforce, training, local hire, and apprenticeship programs targeted to residents in DACs.

### *ii. 13. Workforce Development*

Under this strategy, the FSP should include components that address the need for the State to directly support workforce development. This includes, but is not limited to, funding opportunities for workforce development and training, including apprenticeship and pre-apprenticeship programs. State-provided workforce development funding should include additional assistance for minority and women-owned business enterprises, service-disabled veteran-owned businesses, and training organizations that target traditionally excluded populations as well as displaced workers.

### *iii. 16. Economic Incentives*

When offering incentives, the FSP should include language to encourage the provision of additional incentives to companies that adopt local hiring benchmarks when bringing operations to New York State. These incentives could include tax credits or the opportunity to participate in ReCharge NY.

## **E. Waste**

### *i. W1. Organic Waste Reduction and Recycling and W2. Waste Reduction, Reuse, and Recycling*

As the FSP outlines the contraction and transformation of New York’s waste system, it should include components of this strategy that take into consideration (a) how waste reduction will impact workers in the waste sector; and (b) how best to support workers as they adapt to the changing needs of this sector. Under workforce development, the FSP should reference the need for training and trade skills for workers in the waste sector who will have to learn how to maintain and operate zero-emission waste haulers. The FSP should also specify the need to fund or directly provide resources to support apprenticeship and pre-apprenticeship programs in workforce development.

### *ii. W8. Recycling Markets*

As the New York State Department of Environmental Conservation and the New York State Office of General Services work to incorporate recyclables requirements into the State’s green procurement programs, the FSP should include language to incentivize the creation of high-roads manufacturing and supply chain jobs in New York’s recyclables market.

## F. Gas Transition

The strategies put forth in the FSP’s chapter on New York’s gas transition will have considerable implications for the existing fossil fuel workforce. As such, the FSP should provide a more robust explanation of what a just transition for the gas system transition looks like. In its current iteration, in lieu of specific steps the State should take to ensure workers are adequately considered and protected throughout this process, the DSP makes only a passing reference to just transition, noting: “[t]he transition away from fossil gas should be carefully managed, phased, and conducted with a focus on just transition principles”.<sup>19</sup> Therefore, under the Advisory Panels’ recommendation regarding “Inclusion of LMI and the gas industry workforce,” the FSP should incorporate the following components that are necessary yet absent in the plan’s current form:

- Methodologies to meaningfully engage the gas industry workforce throughout the transition, including worker assessment plans to understand the status of existing workers in terms of retirement and career planning, in order to ease the workforce transition; and
- A detailed explanation of what “protections”<sup>20</sup> for the gas industry workforce should be under an equitable transition plan, including protections for worker wages, benefits, and pensions.

## IV. Conclusion

New York’s just transition as put forth by the Final Scoping Plan has the ability, if done correctly, to fundamentally reshape New York’s relationship to its workers. As it stands, the DSP has far to go to lay out an adequate roadmap to achieve the just transition goals. The FSP must do more to support workers and their rights, for instance, by requiring labor standards on projects receiving State funding or taking place on State property and by protecting existing workers employed in the fossil fuel industry or facing displacement. Beyond protecting and empowering both existing and new workers, the FSP must lay out direct pathways for the State to support workforce development efforts while exploring additional mechanisms to incentivize the creation of high paying jobs with benefits and protections across the green economy. And, finally, across each sector chapter, the FSP must lay out specific components within listed strategies that will support a just transition. By implementing the above recommendations, New York can lead the nation in embodying a truly just, worker- and community-led transition to a clean energy, fossil-free future.

Respectfully submitted,

Acadia Center  
All Our Energy  
Alliance for a Greater New York

Alliance for a Green Economy  
Brookhaven Landfill Action and  
Remediation Group

---

<sup>19</sup> DSP at 266.

<sup>20</sup> DSP at 268.

Catskill Mountain Keeper  
Clean Air Coalition of WNY  
Climate Reality Project, Capital Region NY Chapter  
Climate Reality Project, Finger Lakes Greater Region NY Chapter  
Climate Reality Project, Hudson Valley and Catskills Chapter  
Climate Reality Project, Long Island Chapter  
Climate Reality Project, NYC  
Climate Reality Project, Westchester NY Chapter  
Climate Reality Project, Western New York Chapter  
Climate Solutions Accelerator of the Genesee-Finger Lakes Region  
Committee to Preserve the Finger Lakes  
Community Food Advocates  
CUNY Urban Food Policy Institute  
Earthjustice  
Environmental Advocates NY  
E2 (Environmental Entrepreneurs)  
Fossil Free Tompkins  
Gas Free Seneca  
Green Education and Legal Fund  
GreenLatinos  
HabitatMap  
Hotshot Hotwires  
Jobs to Move America  
Long Island Progressive Coalition  
Nassau Hiking & Outdoor Club  
Network for a Sustainable Tomorrow  
New Clinicians for Climate Action  
North Brooklyn Neighbors  
NY Renews  
People of Albany United for Safe Energy  
Push Buffalo  
Roctricity  
Sane Energy Project  
Seneca Lake Guardian  
South Shore Audubon Society  
Sustainable Finger Lakes  
Tri-State Transportation Campaign  
University Network for Human Rights  
UPROSE  
WE ACT for Environmental Justice