Comments for New York State Draft Scoping Plan for the Climate Leadership and Community Protection Act

Commercial and Residential Buildings

To the Climate Action Council:

My name is Jon Randall and I live in Webster, NY 14580. I am a retired software developer and climate advocate with The Climate Reality Project, as well as a jazz bassist.

I am deeply concerned about climate change because I lived in CA from 1997 - 2020 and saw the steadily worsening heat and drought over that period, culminating in the summer of 2020 which was bad enough to make me relocate.  I am deeply concerned about the future of our society if we continue on our current path.

The more I learn, the more I appreciate the need for rapid change since several of the “tipping points” are already progressing to where we will not be able to stop them.

 I know that buildings are the largest source of GHG emissions in NY and we must do everything we can to help transition NY homes and businesses to net zero.

**In summary:**

**I support elimination of:**

* The “100 foot rule” - 16 NYCRR §230.2(c), (d), and (e)
* The rule requiring free natural gas hookups on demand  - 16 NYCRR §230.2(a).

**I support:**

* All Electric Building Act: S6843A (Kavanagh) / A8431 (Gallagher)
* The Advanced Building, Appliance, and Equipment Standards Act: S7176 (Parker) / A8143 (Fahy)
* Gas Transition and Affordable Energy Act: S8198 (Krueger) /AXXXX #TBD (Fahy)
* The Fossil-Free Heating Tax Credit: S3864 (Kennedy) / A7493 (Rivera)
* Sales Tax Exemption: S642A (Sanders) / A8147 (Rivera)
* Finally, I support funding for Disadvantaged Communities, *who must not be left behind* as we make this critical transition.

**We need to counter misinformation**

Fossil fuel interests have been spreading misinformation about the Scoping Plan, describing its vision for a fossil fuel-free New York as “unaffordable”, and electric home heating as “unreliable”.  I reject these deliberate mischaracterizations and I congratulate the Climate Action Council for successfully mapping a transition to electric heating which is BOTH affordable AND reliable.

You can only arrive at “unaffordable” if you ignore all the external costs related to human and environmental health and disaster recovery.

The other, rarely mentioned truth is that we will run out of fossil fuels and will transition anyway.  So let’s do it now.

**Geopolitical concerns**

The recent events in Ukraine underscore the need for energy independence and fossil fuel independence. Putin’s horrific actions are compelling nations across the globe to reduce their dependence on oil and gas so as to avoid funding a tyrannous regime. Furthermore, the rising cost of fossil fuels since Putin’s Ukraine invasion has been dictated by global market conditions and not by our nation’s ability (or inability) to meet its own fossil fuel needs. We must do our part to remove fossil fuels from the international geopolitical equation, and at the same time provide reliable, clean and affordable energy to meet the needs of homes and businesses in New York State.

**General Support**

I wholeheartedly support upgrades to codes and standards in support of a net-zero future.

**General Concerns**

I am concerned that timelines for some phase-outs are too long and details for phase-ins of alternatives are missing. Given the urgency of the climate situation, we need a definitive moratorium on all new fossil-fuel-based infrastructure with no allowances for expansion other than to maintain reliability during the transition to 100% electric heating . Such a moratorium is critical for preventing further delay in the transition away from fossil fuels and avoiding further harm to the planet.

**Detailed Comments concerning Residential and Commercial Buildings**

I strongly support the focus of the Scoping Plan on eliminating natural gas use in the buildings sector, including decommissioning of natural gas infrastructure as rapidly as feasible while still maintaining reliability and affordability. I strongly support the building/zoning code changes to phase out the use of natural gas in heating systems and other building appliances. In particular, I support elimination of the “100 foot rule” - 16 NYCRR §230.2(c), (d), and (e) - as well as elimination of the rule requiring free natural gas hookups on demand  - 16 NYCRR §230.2(a). I also support ending rebates for purchase of natural gas equipment. In addition to the plan’s proposed prohibitions of fossil-fuel-based equipment and appliances, I support incentivizing building owners to transition to electric heating and appliances *before* the end of the useful life of existing equipment. Such incentives are critical for driving down emissions as quickly as possible and averting a mismatch of supply and demand during the timeframe when prohibitions on replacement equipment become effective. I reject the use of natural gas as a supplemental heat source “at times of peak need”. This specious exception is not a true need and serves only the special interests of natural gas companies to maintain pipeline infrastructure indefinitely and to continue to profit from harming our environment by conducting business as usual. I support the Renewable Heat Now Legislative agenda or equivalent policy, including $1 billion in annual funding for electrified, affordable homes, the All Electric Building Act: S6843A (Kavanagh) / A8431 (Gallagher), the Advanced Building, Appliance, and Equipment Standards Act: S7176 (Parker) / A8143 (Fahy), Gas Transition and Affordable Energy Act: S8198 (Krueger) /AXXXX #TBD (Fahy), and the Fossil-Free Heating Tax Credit: S3864 (Kennedy) / A7493 (Rivera) and Sales Tax Exemption: S642A (Sanders) / A8147 (Rivera). Finally, I support funding for Disadvantaged Communities, *who must not be left behind* as we make this critical transition.

Thank you very much for the opportunity to make public comments concerning the Draft Scoping Plan.

Sincerely,

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