



July 1, 2022

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

Re: Draft Climate Action Council Scoping Plan Comments

Dear Climate Action Council,

The New York State Laborers' Political Action Committee (NYS Laborers' PAC) is an organization representing over 40,000 unionized members and 24 local unions. NYS Laborers' PAC aggressively advocates for wage and safety standards for our members, raising the floor for both union and nonunion construction workers.

NYS Laborers' PAC commends the Hochul administration, the New York State Energy Research and Development Agency (NYSERDA) and the Climate Action Council for their painstaking efforts in developing a draft scoping plan to realize the goals of the Climate Leadership and Community Protection Act (CLCPA). While we appreciate the effort put forth and concur with many of the provisions outlined, we feel the plan could be more aggressive in the promotion of labor standards and the incentivization of zero-emissions sources.

As New York continues to move toward a clean energy economy, the mission to achieve a just transition must not be forgotten or viewed as a secondary concern. The inclusion of labor standards will ensure the jobs created in the green economy provide for family-sustaining wages and benefits, as well as the necessary skills and safety training. The transition to a clean energy future in New York State must include requirements for the payment of prevailing wages, pre-apprenticeship and apprenticeship training. In addition to creating quality careers, the payment of prevailing wages infuses dollars back into local economies, uplifting local businesses. Furthermore, pre-apprenticeship and apprenticeship training requirements create greater opportunities for targeted populations, including those who are economically disadvantaged. The Climate Action Council has the ability to include these standards in their Jobs Study and to create a statewide Office of Just Transition in their finalized scoping plan. These measures will ensure a fair and comprehensive transition that will benefit workers and communities alike.

In addition to the inclusion of labor standards, the scoping plan must do more to incentivize zero-emissions sources like green hydrogen and biofuel. New York cannot rely solely on renewable energy sources, but must utilize all tools available to reach the ambitious climate goals outlined in the CLCPA. The energy needs of the state cannot be met with strictly renewable sources yet, and all non-emitting options must be aggressively pursued. Incentivizing and subsidizing zero-emissions sources would be tremendously impactful in reaching emissions goals. The state should also include a more robust and comprehensive

plan to integrate, utilize, and convert lateral gas infrastructure and existing right-of-ways to accommodate and promote ground source heat pump capacity. Without state support for widespread, scalable, district, geo-thermal loops, our renewable generation plans will fall far short on supply, as continued electrical demand increases. These efforts should be coupled with a more dedicated blueprint that facilitates efficient building retrofits. These actions must be taken in conjunction, and adjacent, to the larger scoping plan. All of these combined solutions should continue to include the incentivized labor and community protections that this administration has been committed to during this process. As the state continues to decommission fossil fuel sources, we must ramp up efforts to promote non-emitting sources and aggressively pursue all viable green solutions to meet New York's vast energy demand.

New York has immense challenges ahead in the fight to combat climate change. The finalized scoping plan should consider aggressive mechanisms to reach the goals of the CLCPA, while also focusing on empowering workers in the just transition. We thank you for considering our comments pertaining to this important topic.

Sincerely,

Vincent Albanese
Director of Policy & Public Affairs
New York State Laborers' PAC