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What I agree with in the 'Draft Scoping Plan'.

* I am fully supportive on the basic vision, goals and means of the draft scoping plan.

* If I was to specifically endorse a scenario now, I fully endorse if possible, 'Scenario 3: Accelerated Transition Away from Combustion', as moving towards implementing 'Scenario 4: Beyond 85% Reduction'.

Scientific clarity and honesty

* I appreciate the inclusion of fully understanding methane's larger impact over a 20-year horizon, rather than the standard 100-year carbon-based horizon so often used. The Intergovernmental Panel on Climate Change (IPCC) has dramatically shifted their understanding of methane's greenhouse impact since 1990 (Grubert & Brandt 2019)

* I urge the CAC guide the plan away from relying on false solutions including any methane use including biogas, using hydrogen for general energy distribution, and carbon capture.

* These methods presume to be 'bridges' to renewable energy, but may instead encourage installing infrastructure which would eventually become stranded assets, leaving ratepayers and taxpayers on the hook.

* Biogas or 'green methane' would remain as vulnerable to the same 'fugitive' or leakage pipeline issues as natural gas currently. Also, after initial enthusiasm, biogas could easily run out of product. Thereafter, many could find political excuses for resuming using regular fossil natural gas.

* If these methods are endorsed across the board, they will complicate implementing and monitoring the CLCPA's success, by introducing potential greenhouse gas leakage.

* The only exceptions from this list could include, facilities where methane is already generated and captured, and must somehow be disposed of. For example, municipal wastewater plants generate methane, which could be tapped in ways which release the least GHG.

* However, there are 'devils in the details'.

* For example, the question of electrifying transit maybe more complex than simply using battery-electric vehicles. For example, I reference here our local transit provider Central New York Regional Transportation Authority's 'Zero-emissions Fleet Transition Plan'. Here CNYRTA claims battery vehicles do not provide adequate range, and take too long for charging. So CNYRTA's transition plan is tentatively based on hydrogen fuel cell vehicles, powered using natural gas. (pg.33 in the 5/20/2022 CNYRTA Board meeting agenda, see references for online link). Is there a way the CAC or some NYS agency can at least provide feedback or guidance for agencies or public authorities facing this sort of question? Possibly, diagrams or graphs could present the range of tradeoffs for such choices more clearly. Also see below, my comment on clarifying synergies vs tradeoffs for adaptation vs. mitigation.

*** NYS definitely needs an equitable approach on Climate Change.**

* The history of implementing energy infrastructure in our culture is fraught with creating subsidy and 'sacrifices' from those less empowered to defend themselves.

* For a simple example, certain urban neighborhoods became 'sacrifice zones' for urban highways which subsidized wealthier daily job-commuters living in the suburbs.

* Over time, deriving subsidies from these 'energy sacrifices' has rendered our society far more complex than is feasible managing, for example by concentrating urban poverty and reducing city tax bases.

* So I agree, taking meaningful action on the fossil subsidies which created our climate change dilemma, should include re-investing in those people and areas 'sacrificed' by previous fossil-driven development.

* Furthermore, there is strong potential for job creation and workforce development in our urban areas.

* Such action will require much up-front investment, but seems worth it for the long-run outcomes.

My basic critiques on the draft scoping plan.

*** This scoping plan needs a holistic vision, in multiple respects.**

* Visioning is most needed for motivating people towards collaborating on the complex solution sets we will need for implementing the CLCPA going forward.

* **Collaboration is essential.** Asking single agencies, sectors and workers manage this task without collaboration, would simply fail as the task is too daunting. Our single greatest strength in NYS may be, diverse minds working together, and so reducing social blind spots and solving complex problems.

* Getting diverse parties collaborating more is challenging. I applaud the CAC on creating several advisory panels and working groups. In critiquing the need for clearer vision, I agree with the 'Climate Justice Working Group' (CJCW) critique on the Draft-scoping plan (Appendix B).

* I agree with a vision shifting from extractive economies towards locally-rooted, supportive economies (diagram, App-B, pg.1). This direction works well with broad concepts about reversing the vicious circles of disinvestment we've seen in many communities over time. I agree, solely market-based approaches will not solve these long-standing inequities (App-B, pg.2). The CLCPA needs a holistic vision for avoiding creating pollution 'hotspots' as can occur from carbon trading.

* Focusing here on a key example, Urban planning carries its own local sensitivities, and New York is a home-rule state. However, either mandating or strongly encouraging adequate municipal comprehensive planning, including encouraging for pedestrian, bicycle, wheelchair and transit-friendly

streets seems an essential climate action. I agree with the health-impact vision relating with making streets more active-transport friendly, as articulated on pp. 72-74 in the scoping plan. I also potentially agree with the Transportation emissions reducing plan as articulated in Chapter 11, Transportation (pp.104-128).

* I understand this is a work in progress, and the plan can only list the many good but unrealized potential approaches possible.

* A more holistic presentation and idea breakdown may help clarify this 'land of 1000 dances'.

* The 2022 IPCC report (AR6) clarifies climate benefits from mitigating transportation emissions in Cities in Chapter 8. Specifically, the IPCC continues advocating for 'smart', compact urban municipal planning including spatial approaches, which reduces the need for traveling longer distances and is friendly and safe for active transport.

* In the same chapter under Section 8.2, 'Co-Benefits and trade-offs of urban mitigation strategies', the IPCC also highlights potential cross-benefits from combining adaptive and mitigative measures. For adaptive and mitigative actions on a related area, the IPCC differentiate between mutually beneficial 'co-benefits' also known as 'synergies', from 'tradeoffs'. In considering mitigative or adaptive action, a tradeoff can undermine the other's effectiveness (Sec.8.2.3 Coupling mitigation and adaptation). There are several graphs analyzing potential synergies and tradeoffs for various action clusters.

* Clearly presenting your information this way, makes a better case for selecting among and between actions.

* Some possible actions can create synergistic clusters. For example, creating urban multi-use trails or 'greenways' for walking, wheeling or pedaling can combine mitigating car alternatives with a positive health tradeoff, and can also incorporate adaptive aspects like planting trees for reducing urban heat island. The trails linear open space can also increase a cooling ventilation by allowing micro-breezes between the trees. So we can conclude this single land use has multiple co-benefits with few tradeoffs. However, we might also note a possible tradeoff in how such a trail might introduce 'green gentrification' in a lower-income area. Gentrification issues can be dealt with in other ways, but my point here is, adaptive, responsive planning requires relating the issues somehow.

* Overall, there are already and will be many more complex questions and possible action clusters in the CLCPA planning. I strongly suggest presenting these clusters not as static lists but in dynamic diagrams or graphs comparing synergies and tradeoffs among potentially competing approaches. This leads the reader more into clearer holistic understanding to begin, and renders finding and communicating solution sets easier.

More about 'vision' * Improving clarity on vision, by clarifying your discursive and idea 'history'.

* One commentator at the Syracuse session suggested, can you be more clear about what you cite? He suggested, creating clickable links in the document, which actually open the source cited.

* I will elaborate on this comment and ask if the CAC can reveal the original inspirations driving various policy suggestions, as an organized literature base, so the reader can directly view the evidence and inspirations for your policy design. This will help us in understanding the larger knowledge base around various issues.

Example: NYSERDA's recent 'energy hubs' idea sounds very exciting and interesting. As someone keen on the topics clustered around green workforce development issues, the 'Energy Hubs' approach sounds potentially enlightened and creative. <the devils in the details, so> But you present 'energy hubs' in a very general way, and I am left curious, how did you get there, and what is your basic long-term vision? Could NYSERDA provide a basic history explaining the precursors, and how this morphed into this 'energy hubs' idea? Some examples would be helpful, even if only similar.

Benefits from collaboration and sharing discourse on large, extended projects.

*** In being reflexive here, I will describe a brief history of some social discourse I have been involved with in an urban setting.** I think the Syracuse experience with I-81 explores how this scoping plan may affect lower-income people and communities, and also how collaboration may likely help the CLCPA.

* The vision matters here, and I can only start going there by explaining my vision.

* During the past 10 years, have been involved with the I-81 project in Syracuse, starting with 2 citizen action groups = Moving People Transportation Coalition (MPTC, and Urban Jobs Task Force of Syracuse (UJTF).

* MPTC's original vision was, convincing people and groups in Syracuse, how the I-81 project is significant and matters for the region in multiple ways. MPTC especially emphasized a social justice framing as critically important for understanding the project's potentials.

* MPTC's original goal was simply, starting the necessary community conversations about seriously considering the project's dilemma and possible solutions, while remaining initially neutral on design choices.

* Only after some iterative discussions and evidence presented by the NYS DOT on the project's various considerations and possibilities, MPTC decided on endorsing a build alternative which would remove the highway altogether, which later became known as the 'Community Grid' alternative.

* MPTC's participation in various conversations within and between local communities helped foster a larger understanding about the issues involved, and why MPTC endorsed a 'Community Grid' model over rebuilding a viaduct or digging a tunnel.

* This larger sense of the issues involved expanded far beyond the highway itself, to include other personal motor vehicle alternatives, including bicycles, battery-driven scooters, and public transit.

* Possibly resulting from this conversation, we have recently seen the rapid adoption of the City's battery-driven scooter program, and public transit may be seeing a resurgence here, against the odds.

* Throughout the project, MPTC interacted with other groups keen on social justice outcomes from I-81, including Urban Jobs Task Force (UJTF) and New York Civil Liberty Union (NYCLU). The interactions proved among the most useful factors influencing design outcomes, and opened up considerations the separate groups had not fully understood.

* The best outcomes seemed deriving from when the closest relations with the lead agency were possible, and the closest relations between various stakeholder groups.

* A key facet among these relations was, the ability for completely disagreeing with the project.

* For example, Urban Jobs Task Force (UJTF) stressed their interest about city residents achieving construction jobs on the project regardless of design choice. UJTF stood ready to protest DOT's decisions, if these did not include training and jobs for city residents. This is not a new or unusual tactic, black power groups among several NorthEast US cities developed similar tactics during the late 1960s, in attempting joining local unions and achieving jobs (REF). As a consequence, this protest activity motivated president Nixon on starting Affirmative Action and eventually supplier diversity programs like MWBE, MBE, local hiring, etc. UJTF's pursuing these tactics on the I-81 project produced a useful set of outcomes, including motivating the City of Syracuse on starting a local job training program 'Syracuse Build', based on San Francisco's CityBuild program.

* Convincing NYS-DOT include and sign onto a local train and hire program for construction jobs on I-81.

* Motivating the City convene a 'big table' around workforce needs on the I-81 project, including NYS-DOT, local, state and federal representatives and the local trade unions.

* So while not a new or unusual tactic, UJTF's insistence on not agreeing with the status quo plan, but requiring new tangents, produced meaningful, practically useful results for the final project design.

* Moving People Transportation Coalition (MPTC) sought close relations with the NYS-DOT project director and staff. However, even while MPTC agreed with NYS-DOT on the overall final design choice, MPTC also reserved their 'power of attorney' on some design questions. These concerns included public safety questions around reducing the lane width and speed limits on the 'Business-Loop I-81' which will go through downtown Syracuse as a regular street. Also, from consulting with New York Civil Liberty Union (NYCLU), MPTC changed their position endorsing DOT's roundabout originally situated close by Dr. King Elementary School (MLK school), to demanding DOT change the Roundabout's position, on public health grounds. Eventually Mayor Ben Walsh also called for DOT moving the roundabout location, and the combined community pressure motivated DOTs revising this design to another location, more than 500 feet from MLK school. This roundabout debate produced further outcomes, in motivating the State Assembly and Senate pass Sen. Rachel May's SIGH act, which prohibits building highways within 500 feet of schools, and prescribes specific adaptive measures for those schools already located within 500 feet of highly traveled roads.

* NYCLU has joined with 'Families for Lead Freedom' on continually pushing NYS-DOT on implementing safer work practices, for preventing releasing fugitive lead poisons while completing this project. Other parties like the local NYS Occupational Health Clinic, are now also advocating for worker safety contra lead exposures.

* So in sum, the combined actions among these groups with differing supporters, aims and intentions culminated after many years, as basically joining together around a common design choice, while also pushing the state towards improving their public health and environmental and social justice goals on the project.

* Transparency and information sharing has greatly favored this meeting of discourses, and reduced social discord among these stakeholders. For their part, NYS-DOT seems satisfied that a significant majority of Syracuse City residents prefer the 'Community Grid' alternative over keeping a highway there somehow.

* Generally speaking, the discourse here over the I-81 project's course became more fluid, spreading among the grassroots through local and political leadership and back. The dialog usefully challenged the status quo here around land use planning, so at this point both City and County planners are beginning to discuss 'Transit-Oriented Development' as a viable working concept.

Statewide advocacy networks, an example

* For a second and related example, I recall attending a yearly conference called New York State Transportation Equity Alliance (NYSTEAA), from ~2011 through 2014 or so. Organized by WeAct for Environmental Justice, NYSTEAA was a 'bottom-up' or grassroots meets 'top-down' planners exchange, which seemed useful for both. NYSTEAA allowed the participating organizations consider meaningful new concepts, for example including 'Equitable Transit Oriented Development' or eTOD.

Some useful complex social contracts in the draft scoping plan, please amplify.

'Equitable Transit Oriented Development' or eTOD.

* I am glad seeing eTOD made the Draft Scoping (page 309).

* "TOD also presents an ideal opportunity to meet equity and climate justice goals of the Climate Act by incentivizing green affordable housing near transit, which also reduces transportation costs for lower-income households. E-TOD ensures that affordability, climate justice and environmental justice

play a prominent role in the TOD equation in planning, zoning, funding, project implementation and public policies on the State and local levels."

* eTOD is a complex dance between local advocates, agencies, developers and municipalities for including affordable housing with TOD. I recommend understanding and using the eTOD approach. As the CAC observes, eTOD can help deter gentrification, especially 'green gentrification' where environmental improvements motivate too-rapid investment in a neighborhood. Over several recent years, the City of Chicago has worked with local advocates 'Elevated Chicago' on designing, passing and implementing their eTOD ordinance. I strongly suggest studying the Chicago example for guidance.

Healthy Homes, another useful social contract, please amplify somehow.

The draft scoping plan mentions another socially 'complex' solution set, in 'healthy homes' approaches which attend health concerns in housing, while also attending weatherization and energy efficiency. The Draft Scoping Plan mentions 'Healthy Homes' or housing in several places, as a Comprehensive Career Pathway (pg.55), as a health benefit from basic weatherization (pg.77) and as an opportunity for leveraging funding as combined with community development (pg.146).

I suggest the CAC elaborate more about using a 'weatherization plus health' approach. The Federal Government focused a lot on 'Weatherization plus health' in the early 2010s, but their interest waned until more recently. 'Weatherization plus health', like eTOD and other complex social approaches, taps social collaboration for improving energy efficiency and other co-benefits as program outcomes.

* Weatherization plus health (Wx+H) exemplifies how, social contracts can overcome what seem serious barriers against fully implementing weatherization, and can also maximize health outcomes by pursuing a holistic program design.

* Collaboration can enable solving problems otherwise insurmountable by single-focused agencies and service providers.

* These collaboration concepts seem compatible with NYSERDAs 2021-2022 'Energy Hubs' pilot concept, where establishing local and regional energy workforce training centers could include, recruiting and hiring for specifically collaborating around programs combining 'weatherization plus health'.

* Policy-level (top-down) coordination may help by

* enabling cross-agency collaboration and knowledge-building (De Souza et al 2019),

* enabling leveraging funding from multiple sources (Wilson, Tohn 2013).

* An important question is, what building structural problems discourage weatherization programs from making basic weatherization / energy efficiency upgrades. These problems often indicate which health interventions are most cost-effective in enabling basic weatherization (Wilson, Tohn 2013).

* Collaborations & seem to resolve issues around, people being out of their area of expertise.

* An initial barrier contra establishing Wx+H programs is, cross-disciplinary expertise is often impractical for one type of provider, like a weatherization staff conducting health audits (Rose, Hawkins & Tonn, 2017). However, a more recent federal program analysis by De Souza et al (2019) suggests program partnerships between weatherization and health agencies can resolve this knowledge barrier. De Souza et al do not explore the complex dynamics around eventual cost & budget tradeoffs from collaboration, which seem more difficult in evaluating. However, combining expertise in cross-agency partnerships may improve overall program cost and outcomes, by reducing common and overall inefficiencies in reaching multiple goals.

In our limited experience in Syracuse,

* There was initial enthusiasm for the Syracuse 'Green and Healthy Homes Initiative'. However, as of this year, that program remains only as a pass-through for the City's lead program.

* If NYS could collaborate on the agency level, this sort of program would have far more chances of succeeding.

Policy Implementation shortcomings.

The Draft Scoping plan depends on building electrification activists pushing the NYS legislature on passing a building electrification bill. While I am 100% all for such a bill, I am not sure if this will ever pass in NYS. If not, where does this leave our ambitious CLCPA?

Curiously, in place of passing a building electrification bill this term, the NYS Legislature passed a "utility thermal energy network and jobs act" or TEN bill. The discursive history driving this bill is interesting in itself, and suggests how

* Stakeholders like the unions, can become more directly motivated, by focusing on how their interests are represented and supported.

* The outcomes in this case seem useful, where the union's specific work focus literally directs a useful discussions around the specific measures which would create more shared infrastructure underground.

* Possibly this suggests a pattern for enacting further legislation enabling the CLCPA's progress.

* However, I am still unsure if this could involve natural gas somehow.

* Also I urge caution with a program amplifying digging, as being aware of potential lead poisoning concerns from leaded urban soils.

In sum,

* I want to emphasize and amplify what I see as the strong suits of the CLCPA and draft scoping plan. Possibly owing to New York State's rich cultural heritage emphasizing social relationships, the climate act and even the draft scoping plan is organized for prioritizing shared connections around complex issues, and motivate collaboration on solving the most difficult problems.

* Drawing from the 81 experience, I think this can be done in ways which can afford maximizing community involvement, while still meeting specific goals, and reaching consensus on solving complex, difficult problems.

* As I've outlined with the I-81 experience, these approaches require different parties communicate closely and transparently around resolving specific issues.

* So I applaud the Climate Action Committee including various stakeholder advisory groups, and requesting their comments on various approaches. The CAC could request these different groups interact with each other on specific problems. Where collaboration seems more difficult, this would indicate the more contentious problems which need more attention.

* A useful metaphor may be, writing a wiki, where we as different stakeholders must agree on a shared text. If disagreements emerge, the process can include dispute resolution methods where stakeholders can hash through the various alternatives in the same spaces. This method can potentially produce grounded understandings where collaborations can begin, as seems happening with the example of multi-stakeholder support for the 'Thermal Energy Networks' bill.

* So-called 'wicked problems' occur where the stakeholders cannot agree on what a problem is, and therefore what and where might define a problem's 'stopping point'. Therefore the problem remains 'unsolvable'. Climate Change is often cited as a 'wicked problem'. However, the results from Syracuse and now possibly the TEN bill seem suggesting, 'wicked problems' can be redefined through some dialog sharing information about a problem, and then collaborating around that information.

Thank you for your service.

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