

Thank you for this opportunity to provide comments on the draft Climate scoping plan. My name is Judith Myerson and I live in Pine Bush, New York, in the town of Mamakating. I am asking that you meet the goals set by the Climate Leadership and Community Protection Act, insure that our state has an effective and realistic plan in place to meet climate goals. By doing so we can serve as a model for other states and the world for a just transition to renewable energy and insure a future for humans and other species on Earth. While I am 72, and will not be here to see the results if we do not quickly shift our path, my grandchildren and their children will reap the consequences of our actions or inactions. We owe it to them to act ethically, morally, and comprehensively now, and do all that is possible to create a livable, sustainable, safe and equitable world for all.

POWER AND ELECTRICITY SECTOR:

Please include the following recommendations in the Power and Electricity Sector of the plan. This will insure that the outcomes of this plan are driven by both climate and environmental justice, as required by, the Climate Leadership and Community Protection Act (CLCPA)

The power generation and electricity sector lays out a strong set of recommendations, but it needs a bolder hand and stronger commitments. By 2050, our electricity needs in New York will double, as we will be heating our homes and powering our vehicles with electric power. New York must make plans to phase out existing fossil fuel plants, many of which are reaching the end of their lifespan. Current fossil fuel plants need to be retired and replaced to eliminate pollution impacts on communities, and the state must provide funding and support for both workers affected by this transition, and the communities around these plants as we reach our goal of zero emissions by 2040.

The scoping plan needs to phase out all fossil fuels for electricity generation by 2040, and prioritize the retirement of fossil fuel-fired plants whose emissions disproportionately harm disadvantaged communities, consistent with the Climate Act.

There needs to be a clear moratorium on fossil fuel power plants and focused deployment of proven renewable energy technologies and expanded battery storage. It is evident that New York will need a big increase in renewable energy, battery storage, and energy efficiency. We are in a critical decade for building out a huge fleet of renewable generation; we cannot rely on false solutions and hypothetical technologies like hydrogen, “renewable” natural gas (RNG), and carbon capture and storage (CCS).

New York should set a year-by-year target for permitting new wind, solar, and battery storage. State agencies should fully leverage tools like community workforce agreements, community benefit agreements, first-source hiring, and project labor agreements to increase access to construction jobs and permanent jobs for

disadvantaged communities (DACs); work with the capacity of people and develop agreements in partnership with frontline communities, industry, and organized labor; and further emphasize green worker-owned cooperatives. It is crucial that this point is stressed to continually call attention to the state to address barriers to renewable energy siting. All work to this end requires full staffing of relevant state agencies, including the Office of Renewable Energy Siting, engagement with Indigenous Nations in NY, and a comprehensive public education and information push on the benefits and opportunities of clean energy

Low-and-moderate income (LMI) program size needs to be commensurate with need and incentive and rate structures for distributed energy resource (DER) resources should reflect the benefits they can provide when paired with equity goals.

REGARDING POWER AND ELECTRICITY, THE SCOPING PLAN SHOULD ALSO SPECIFICALLY INCLUDE:

1. Ensured protections for all communities facing plant closures:

- Training and supportive services for displaced workers, beginning well before plant retirement, to enable a smooth job transition.
- Sufficient funding of the Electric Generation Facility Cessation Mitigation Program to reduce the local property tax impacts of plant closure on municipalities and school districts.
- Plant-owner responsibility for the costs of site remediation.
- Re-use of power plant sites for battery storage. This would not only support the clean energy transition but would also help to mitigate the revenue and jobs impacts of plant closure.

2. No new gas infrastructure permits to avoid increases in GHG emissions and creation of more stranded assets.

3. Accelerate renewable energy development to reach the Climate Act's near-term target of generating 70% of electricity from renewable resources by 2030.

- Direct the NYS Office of Renewable Siting to set annual goals for megawatts of renewable resources to be permitted each year through 2030.
- Incentivize "agrivoltaics," or the integration of solar with agricultural production on the same land, and direct NYSERDA and the Department of Agriculture and Markets to produce educational materials and guidance for farmers, renewable energy developers, local governments, and other stakeholders. Agriculture and renewable energy can be complementary and mutually-supporting land uses, and agrivoltaics has great potential to minimize land-use conflicts and strengthen community support for renewable siting.

4. High-value renewable projects that contribute to equity, resilience, and smart land use.

- Prioritize pairing of solar with electrification in low-income housing, and expanded opportunities for low-income participation in community renewable energy.
- Develop incentives to encourage solar projects on rooftops, over parking lots and on brownfields to be paired with battery storage.
- Require utilities to expand the capacity of the local grid to interconnect with solar (i.e., "hosting capacity"), taking into account any priority locations for solar identified by local governments as well as optimal siting areas, like brownfields.
- Direct utilities to speed up the pace of processing interconnection applications so that investments can be made in a timely manner.

5. Provide communities with the support they need to partner in the renewable energy transition.

- Provide resources and assistance to local governments to streamline permitting and zoning for renewable energy.
- Develop a Clean Energy Development Mapping Tool for local governments to help them plan/site renewables.
- Encourage Community Choice Aggregation (CCA) programs to 1) support 100% renewable energy for supply, 2) integrate community renewable energy and other local energy programs, 3) include programs for low-income customers, and 4) engage in robust public energy education. Authorize counties, and not just villages and towns, to form CCAs.
- Expand benefits to communities hosting large-scale renewable projects, and tailor those benefits to community needs and priorities.

6. Ramp up battery storage development and demand-side solutions to reduce peak demand and enhance grid reliability.

- Expand the Clean Energy Standard to include battery storage (or create a separate Storage Standard), requiring utilities and energy suppliers to procure increasing amounts of battery storage over time as the grid becomes more reliant on solar and wind.
- Promote clean-energy solutions to reduce peak demand and maintain grid reliability, including geothermal heating and cooling and demand response programs.

1. EDUCATION AND WORKFORCE:

The Scoping Plan should prioritize climate education and awareness-raising about the benefits of renewable energy. Successful implementation of the Climate Act depends upon public support and engagement to meet climate goals. It also depends on inspiring young people to pursue clean energy careers and create the workforce needed to transform New York's economy. The Final Scoping Plan should:

- I ask NYSERDA to support a well-funded statewide public information/education campaign, utilizing all forms of media. Engage partners in direct outreach, including Clean Energy Hubs, educational and community-based partners.
- I ask the State Education Department to develop climate change curricula & clean energy jobs training and opportunities in K-12 schools.
- Engage the NYS Education Department, SUNY/CUNY system, labor, community-based organizations, and workforce development and private sector partners to develop and implement a strategy to recruit, train, and skill up the clean energy workforce required to shift to a zero-carbon electricity system.
- Create a State Office of Just Transition to ensure a coordinated, proactive approach to addressing issues related to economic development, job quality, socio-economic impacts, job loss, worker displacement, and job-readiness requirements for employment opportunities in emerging industries.
- Strong labor standards and protections need to exist across all clean energy sectors.

REGARDING PUBLIC HEALTH:

The power generation/electricity chapter rightly recognizes that to prioritize public health, the state must prioritize renewable energy.

- Hydrogen combustion emits nitrogen oxides (NO_x), a precursor to ozone, particulate matter, and nitrogen dioxide (NO₂) at levels that may be higher than those from natural gas combustion because of hydrogen's high combustion temperature. RNG combustion also results in pollutant emissions similar to fossil gas combustion. The scoping plan must hold firm to the commitment for zero emissions in the electric sector by 2040, and account for the cumulative impact of pollutants on disadvantaged communities (DACs).
- The health risks associated with combustion emissions and combustion waste products are not associated with renewable power generation and will substantially decrease with large-scale reduction in combustion for power generation.

IN SUMMARY

- We can't keep digging ourselves deeper into this hole. We must utilize proven renewable energy technologies and expand for renewable generation— Now.
- We must shut down fossil fuel plants and focus on deploying proven renewable energy technologies and expanding battery storage.
- Plants in those disadvantaged communities currently the most impacted should be prioritized in order of shutdown.

- We should replace current fossil fuels that exacerbate pollution impacts on communities and fund the transition off of fossil fuels for workers and communities around these plants.
- We must set year-by-year targets for new wind, solar, and battery storage that champions just job development with permanence and benefits, and we must support green worker-owned cooperatives in partnership with organized labor and frontline communities.