



BY ELECTRONIC DELIVERY

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

Re: Draft Climate Action Council Scoping Plan Comments

July 1, 2022

KYLE BRAGG
President

MANNY PASTREICH
Secretary Treasurer

JOHN SANTOS
Assistant to the President

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VICE PRESIDENTS**

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www.seiu32bj.org

With 175,000 members across 11 states, including New York, SEIU 32BJ is the largest property services union in the nation. Our members are the backbone of the property service industry, working as superintendents, porters, janitors, security officers, window cleaners and other vital roles in our states commercial and residential buildings, airports, stadiums, theatres and other properties.

32BJ is proud of its support for ambitious climate policy including the passage of the Climate Leadership and Community Protection Act (CLCPA) in 2019. 32BJ President Kyle Bragg served as a member of the Energy Efficiency and Housing Advisory Group to the Climate Action Council and Vice-President and Political Director, Candis Tall served as a member of the Just Transition Advisory Group.

Our union believes emphatically that our state and our nation must lead the way in a large-scale transition away from fossil fuels. We live in neighborhoods that endure the worst of climate change and environmental harm and see with our own eyes the need to act now. We also believe that this transition must happen in a way that addresses the legacy of environmental injustice experienced by low-income communities and communities-of-color, and creates family sustaining union jobs.

32BJ is a member of Climate Jobs New York, a growing coalition of labor unions representing 2.6 million working New Yorkers that share our vision of organizing to combat climate change and income inequality. We point the Council to the comments submitted by CJNY, in particular, the Coalition’s recommendations to ensure a just transition, guarantee strong labor standards, and invest in environmental justice communities.

In relation to the building sector where our members work, 32BJ appreciates the holistic and considered approach taken by the Council and believes there is merit in a number of the recommendations made. Below we provide comment on a number of aspects of the plan as it relates to buildings.



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Public financial support

The scoping plan correctly acknowledges the real and substantial upfront cost of performing the type electrification and deep energy efficiency improvements needed. We are pleased to see the Council recommend public financing incentives to help drive the transition and believe they could greatly assist owners in overcoming cost barriers that could initially be prohibitive. We encourage the Council to consider how different segments of the building sector can and will access incentive programs, particularly low and middle-income multifamily buildings, including cooperatives and condominiums.

We remind the Council that the operation and maintenance of buildings supports tens of thousands of good, family sustaining jobs for working class New Yorkers. Any public financing program must enhance, not diminish, the number and standard of these jobs. This means imbedding the ongoing cost of the prevailing industry standard labor conditions into all financing arrangements approved to achieve the state's climate goals.

A phased in approach to decarbonizing new buildings

We support an expeditious but phased in approach to decarbonizing new buildings that is cognizant of the emergent nature of the replacement technology and associated markets. We are pleased to see this reflected in the Council's recommendations and note that New York City adopted such an approach in its recently passed Local Law 154. This law prohibits the use of fossil fuels in new buildings below seven stories, after December 31, 2023, and in buildings of seven stories or more, from July 1, 2027. In doing so, the law recognizes the different technical challenges of building taller buildings, and additionally, provides a clear timeframe to all stakeholders, including the workforce and developers. We encourage the state to take a similar approach based on building size for jurisdictions outside of New York City and support the requirements contained in City law remaining in place for city buildings.

Alignment and support of New York City laws

32BJ has been proud to support legislation in New York City to reduce building emissions, including the groundbreaking Local Law 97. With respect to performance standards for existing building, the Council's recommendations make note of the intention for state initiated standards for buildings of 25,000sqft to align with the City law where appropriate. The union strongly encourages the Council to consider the interaction between all city and state energy efficiency and performance standards programs to ensure the two are creating consistent incentives for the market, and providing the most harmonious policy setting possible for building operators. In addition, we note how critical state efforts to green the grid are to an effective implementation of Local Law 97. To this end, we strongly encourage the Council to recommend ambitious targets for bringing new



solar, wind and battery storage capacity online and deliverable to the New York City grid.

Workforce development and training

It is important not to overlook the integral role operations and maintenance workers, who are in buildings day-in-day-out will play in this transition. Residential building workers like superintendents, can be onsite agents-of-change to improve a buildings performance, while janitors in commercial buildings can contribute greatly to a buildings’ energy efficiency program. To put workers in the best position to meet the challenges of a transformed building sector, it essential that training providers, particularly joint labor-management funds that hold the interest of workers in mind, have what they need to deliver the most up-to-date programs. This includes ensuring access to new technologies and providing flexible support options that will help workers get time off the job to learn the skills needed now and in the future.

We thank the Council for the opportunity to provide these comments and commend you for your work thus far. If you have any questions, please be in contact with New York State Political Coordinator, Deandra Khan at dkhan@seiu32bj.org or (929) 208-9181.

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