

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.

TRANSPORTATION SECTOR:

Transportation accounts for 28% of New York's emissions, mostly from the cars, SUVs, pickups, and other personal vehicles New Yorkers drive to get from place to place. Close to two-thirds of transportation emissions are from these "light-duty vehicles." Emissions from medium- and heavy-duty vehicles, while accounting for a smaller share, have an outsized impact on public health because of the co-pollutants they emit in addition to greenhouse gases, including fine particulates, nitrogen oxides, and carbon monoxide. Aviation and other non-road travel account for 12% of transportation emissions.

Pollution from transportation is a major environmental justice issue, Transportation infrastructure such as highways, truck freight routes and bus depots have tended to be sited in or adjacent to low-income communities of color, and these communities suffer disproportionately from related health impacts such as asthma, cardiovascular disease and other major health problems.

Please include the following recommendations in the Transportation 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):

ELECTRIFICATION :

I support the Scoping Plan recommendations to:

- Establish a "feebate" on vehicle purchases to accelerate the shift to EVs. The integration analysis for the Scoping Plan concluded that 47% of sales must be EVs by 2030. Price parity between EVs and gas-powered cars is expected later in this decade, and in the interim, a fee on the sale of new gas-powered cars to pay for higher incentives for EVs would encourage wider adoption of EVs. Incentives should be extended to used EVs, which will help drive adoption among low- and moderate-income consumers who typically cannot afford a new car.

- Enable direct-to-consumer sales by electric car manufacturers to reduce barriers to purchasing an EV. A bill has been introduced in the State Legislature (S.1763/A.4614) to enable direct sales, but has not moved forward.
- Amend building codes to require new buildings to be EV-charging ready. This is already a requirement of NYStretch 2020, NYSERDA's supplement to the State Energy Code, and should be included in the next round of Energy Code updates.

The Scoping Plan should go even further to require new commercial and multifamily buildings with over 10 spaces to include EV charging facilities.

I also support:

- Adoption of regulations similar to California's proposed Advanced Clean Fleets regulation to reach 100% sales of zero-emissions medium- and heavy-duty vehicles by 2040.
- Enhanced State incentives for the purchase of zero-emissions trucks, giving preferences to fleets adversely impacting disadvantaged communities.
- Expanded charging infrastructure, with a particular focus on investments in disadvantaged communities, multifamily buildings and large employers.
- Utilities be directed to address demand charges that discourage public charging facilities, and design rates and programs to incentivize off-peak charging.
- The New York State passenger fleet be required to be all electric by 2035. (At the time of writing, legislation to do so has passed both houses but has not yet been signed into law.)

The Scoping Plan should also:

- Recommend passage of the Green Transit, Green Jobs bill (S.3535C/A.3090A), which would require all new transit agency purchases to be zero-emissions by 2029, including transit buses and paratransit vehicles. As recommended by the Scoping Plan, the State should work with municipal transportation systems on a plan to electrify at defined replacement schedules.
- Provide dedicated State funding and technical assistance to electrify municipal bus systems outside of the MTA service area, particularly for small-city and county transit systems.
- Undertake a statewide education and public information campaign on transportation electrification to counter misinformation and empower consumers to make the right choices.

Emphasizing the points of the Climate Justice Working Group, this chapter needs to deemphasize vehicle electrification that fails to address single occupancy vehicle issues that are tied to systemic racism and poverty. To date, electric vehicles have a higher purchase price but lower energy and operating costs. Finance needs to be available to cover the FULL cost of new and second-hand electric cars, especially to those to whom it has been historically denied.

The chapter needs clearer explanations of existing language and must be provided so there is as much transparency around policy programs incentives etc as possible. Purchase of zero-emissions vehicles and/or “fee-bates,” for example, offers individuals and families opportunities to purchase clean energy vehicles and shift purchasing habits and make more sustainable choices. However, the language needs to be presented in a way that explains what this policy actually is, and the ideal—as well as the less than ideal—implications.

PUBLIC TRANSPORTATION:

Public access to electrified, expanded, and improved intercity rail transportation will improve area coverage and create many good unionized jobs. High rail transport (HSR) is also a practical alternative to energy-intensive intercity air travel for distances up to a few hundred miles while connecting regions of the state with more frequent deployment times with decreased cost of travel. Before 2030, the creation and completion of a detailed cost-benefit study comparing HSR and very high-speed rail (VHSR) technology assessment for a line from Buffalo to Montauk with an Albany to Montreal branch should be a priority action, taking into account total life cycle costs, including external social and environmental costs and benefits. Towards public fleets, the adoption of an express bus system modeled after Curitiba, Brazil, the most heavily used low-cost transit system in the world, offers a solution to access and low emission/energy efficiency issues in areas with insufficient density to support local trains or light rails.

- Incorporate into the Scoping Plan the Transportation Advisory Panel's target to double the accessibility and availability of public transportation in upstate communities, as well as down-state suburban communities.
- Develop a strategy to support expansion of public transportation, including innovative on-demand micro-transit services, in underserved counties, especially less populated ones where there is not adequate public transport.

REDUCING VEHICLE MILES TRAVELED:

- I support Scoping Plan recommendations to:
 - Develop tax credits for businesses to support low-carbon commuting solutions for employees ((e.g., bike-sharing, discounted employee transit passes, and telecommuting).
 - Expand low/zero-carbon transportation alternatives for first and last mile by 1) prioritizing alternatives agency and authority decisions, 2) prioritize local projects to support non-motorized alternatives (e.g., walking, cycling).

- The NYS Department of Transportation should also update its guidance and regulations to better support low/zero carbon transportation.
- I also recommend require State economic development funding and IDA incentives to adhere to criteria supporting smart growth, transit-oriented development, Complete Streets, and low-carbon and no-carbon commuting solutions.
- Local governments should be empowered to set lower speed limits on all roads, including state roads within their jurisdictions.