

Stephen Cheng

Valley Stream, NY 11581

Tuesday, June 7, 2022

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

Dear Madam or Sir:

Long Island Needs the Climate Leadership and Community Protection Act

- Long Island is on the frontline of climate change. Our coastal communities are threatened by sea-level rise causing flooding and home damage; families are still recovering from the devastation of Superstorm Sandy; and our neighborhoods are overburdened with air pollution from fossil fuels, causing cancers, asthma, and heart disease. We need to meet the goals of CLCPA in the most rapid and equitable way possible for the health and safety of our Island.
- The net benefits to New York of making climate investments now to meet the mandates laid out in the CLCPA range from \$80 - \$150 billion. A path that relies most heavily on renewable energy, rather than on false fossil fuel solutions, costs less and benefits us more. The \$80 - \$150 billion figure is just the beginning. By making necessary climate investments now, New York could see major public health benefits ranging from \$160 - \$170 billion. These benefits would come from increases in air quality, increased active transportation, and energy efficiency interventions in low-and moderate-income homes.

Indigenous Consultation & Solutions

- Indigenous communities like the Shinnecock, Unkechaug, Setalcott, Matinecock, and Montaukett are on the frontline of direct impacts of climate change and have a unique historical relationship to the land and understand best practices for stewardship. Their voices are critical to ensuring that New York State meets the ambitious climate goals set out in the CLCPA.
- There are presently many barriers Indigenous communities face in accessing and benefiting from the renewable energy transition that must be rectified in the final Scoping Plan. These barriers and concerns can only be addressed when robust, genuine and dedicated Nation-to-Nation dialogue is conducted over time. Yet, it is clear from the draft

that there still has been little or no communication between the state and the Indigenous nations that will be impacted by the law's implementation. There needs to be a clear response from the state about how it plans to truly grapple with this vital aspect of our climate law.

- More must be included in the Scoping Plan to support Indigenous-led climate solutions like the work of Shinnecock Kelp Farmers who are growing seaweed to improve water quality in Shinnecock Bay and process the harvest into fertilizer to be used on local golf courses, universities, and other properties. The fertilizer will not only address nutrient runoff from these institutions but also avoid additional carbon emissions generated by importing fertilizers. Seaweed in feed can also significantly reduce methane emissions from beef cattle - by as much as 82 percent - making it an important part of reducing emissions in the agriculture sector. Other forms of seaweed farming could be used in general carbon sequestration efforts as well.

We Must Electrify

- The Climate Action Council put forth three scenarios for our climate future. Of the three, I advocate for scenario three: low-to-no bioenergy and hydrogen combustion and the simultaneous acceleration of electrification of both buildings and transportation to ensure clean air and a healthy environment. In order to reach a zero-emissions power sector by 2040, we need a rapid transition away from fossil fuels and combustion.
- The Long Island Power Authority recently affirmed both the feasibility and benefits of decarbonization of our homes and buildings through heat pumps, which are cost-effective to install and save ratepayers money. One of the benefits of electrification is that it'll add more usage during winter, which will spread the fixed cost of maintaining the electric grid, reducing per kilowatt-hour electricity costs. In this transition though, we must ensure that disadvantaged communities are prioritized with substantial funding to overcome any upfront costs.
- Natural gas cooking appliances release methane and NOx while in use, damaging the climate and degrading indoor air quality which leads to respiratory illness.

No False Solutions, No Hydrogen Combustion

- New York's Final Scoping Plan must not contain false solutions to the climate crisis like biofuels, "renewable" natural gas, biomass, waste incineration, and so-called "green" hydrogen. It must focus on renewable zero-emission technologies that have been proven to work, like solar and wind.

- Hydrogen for electricity generation is not a zero emissions technology regardless of how the hydrogen is produced. Hydrogen combustion produces NOx emissions, a tremendously problematic local public health issue and is against Section 7(3) of the CLCPA. Hydrogen is also an indirect GHG and leaks even more than methane. This is of grave importance on Long Island where the New York Power Authority has already begun a hydrogen demonstration project at the Brentwood Plant, located near several environmental justice communities. And where the Town of Hempstead announced a partnership with National Grid to begin blending hydrogen into the existing distribution system to heat homes and fuel municipal vehicles which poses a major safety and health risk given how untested hydrogen combustion is, and the wear and tear on pipes which are not equipped to handle hydrogen distribution.
- Natural gas and electric utilities across the United States are increasingly pursuing pilot projects to blend hydrogen with natural gas for various end-uses, including as a heating fuel in buildings or for power generation. However research shows these projects would increase consumer costs, exacerbate air pollution, and cause safety risks while minimally reducing greenhouse gases. By comparison, electrification is a proven, low-cost alternative that poses no safety or health risks and can rapidly cut building emissions.

Waste Justice is Climate Justice

- Brookhaven Landfill is a mountain and a monument to racial inequality and injustice. North Bellport has had to shoulder this burden disproportionately and as a result has the lowest life expectancy on Long Island of 73.2 years and the second highest ER visits for asthma. Instead of the draft Scoping Plan meeting this moment with efficacy and with community burden in mind, this plan allows for the continued use of dumping in landfills beyond the scope of the climate law with no mention of ending the practice of landfilling, despite it being responsible for the majority of emissions from the waste sector.
- No landfills here, no landfills anywhere. We must implement zero waste strategies. Our failure to do so should not mean the transferring of waste to another community in states such as Virginia, Pennsylvania, or communities like Fostoria, OH.
- No burning trash. Incineration is a false solution that we have been sold for decades to reduce waste and produce energy. Reducing trash in this manner only ensures that both incineration and landfills continue in our society. This is not a solution, it is a furtherance of the problem. The toxic relationship with incineration and landfilling harms the communities that host these despicable structures as well as the communities in its path anywhere along the wastestream.

Hold Polluters Accountables for Dedicated Funding

- New York must establish a dedicated funding mechanism to ensure reductions of both greenhouse gas and co-pollutant emissions and to begin the state's large-scale transition to an equitable renewable energy economy. An equitable economy-wide pollution fee is likely the best approach to generate the necessary funds in a just manner.
- We know from our experience on Long Island with the Grumman Plume, illegal dumping in our parks, and the dozens of superfund sites that polluters themselves should foot the bill for the damage they have done.

Good Green Jobs & Community Transition

- To achieve the goals set out in the CLCPA, at least 211,000 new jobs are expected to be added by 2030 in the transportation, buildings, fuels, and electricity sectors. This represents a net increase of 189,000 jobs by 2030. By 2050, this number (net) will jump to 268,000. Long Island is projected to see around 33,600 of these net jobs. All these jobs must include strong labor standards including prevailing wage, benefits, and local hiring provisions, funding for workforce development, and more.
- We should establish a Worker and Community Assurance Fund to provide direct age replacement and pension support to fossil fuel-dependent workers as well as support to communities who rely on fossil-fuel dependent industries. We need to ensure communities that host major power plants like Yaphank, Port Jeff, Oceanside, Brentwood, Glenwood, Hempstead, Babylon, and Northport are made whole.

(the above text is from the Long Island Progressive Coalition)

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephen Cheng", is written over a printed name. The signature is stylized and cursive.

Stephen Cheng