**Public Comments re NYS Climate Action Council Draft Scoping Plan**

Thank you for the opportunity to offer comments on the **NYS Climate Action Council’s** **draft Scoping** **Plan**. I am submitting these comments on behalf of an Ad Hoc Climate Change Task Force composed of members of the Roman Catholic community in the Roman Catholic Diocese of Rochester.

In his encyclical, *Laudato Si: On Care for Our Common Home*, Pope Francis urges that we “bring the whole human family together, for we know that things can change” and asks us “what kind of a world do we want to leave to those who come after us, to children now growing up?” It is in this spirit that we submit our input.

The draft plan is an excellent and comprehensive start to address the urgent issue of climate change. It is imperative that implementation of the plan proceed as quickly as possible and to that end, the strongest incentives should be put in place to enable full and committed participation on the part of all the sectors. Financial decisions should be aligned with what’s best for reaching the goals outlined in the plan, including a carrot and stick approach combining incentives and prohibitions.

**Accelerated Transition Away from Combustion 9.2 Scenario 3**

We would first like to express our support for **Scenario 3** in the draft Scoping Plan – **Accelerated Transition** **Away from Combustion** – which strongly focuses on electrification as a strategy and proposes the lowest levels of combustion.

Low income-communities and communities of color are more likely to live near power plants, refineries that generate oil/gas, and petrochemical facilities that produce oil-based chemicals – this proximity causes suffering from the harmful pollution caused by our economy’s reliance on fossil fuel combustion. The faster we move to full electrification, the fewer people will get sick, fewer lives will be lost, new job opportunities will be created.

The Final scoping Plan should avoid anything that will perpetuate the combustion of fossil fuels to generate electricity. A moratorium on new fossil fuel plants will be needed as soon as possible to ensure that those plants reaching end of life will not be replaced with new fossil fuel power plants.

We hope the renewable energy siting process will be streamlined and simplified and include a process for education and conversation on the benefits and necessity of clean energy - to address obstacles that may arise to siting in local communities.

**Just Transition Principles (Chapter 7)**

Catholic Social Teaching focuses our attention on how poor and vulnerable New Yorkers will be impacted by the new systems and policies and strategies proposed by The Scoping Plan to achieve 85% reduction in GHG by 2050.

We support the Scoping Plan’s intention that 40% of benefits accruing from cost savings across the sectors and the public investments in job creation be directed to poor and low-income New Yorkers.

We support a program to offer substantial direct rebates for purchase of electric vehicles for low and middle-income consumers.

The final plan should commit adequate funds annually to cover most or all of the costs needed to support energy efficiency and electrification for low/moderate-income households, especially renters who have no authority to modify the property and will need the cooperation of the rental property owner, more likely with financial incentives for the owner.

**Just Transition Working Group**

The Just Transition Working Group Jobs Study, required by the Climate Act, provides valuable insights into the appropriate focus for jobs in the green economy. They estimate that meting New York’s climate goals will create 140,000 jobs related to buildings by 2030. **We support** their emphasis: *“Advise the council on issues and opportunities for workforce development and training related to energy efficiency measures, and renewable energy and other clean energy technologies, with specific focus on training and workforce opportunity for* ***disadvantaged communities****, and segments of the population that may be underrepresented in the clean energy workforce such as* ***Veterans, women, and formerly incarcerated persons”***

The Cornell University study cited by the Just Transition Working Group recommends New York State pay special attention to workers and communities experiencing negative impacts because of the transition away from high-carbon industries and sectors and recommends establishing a Just Transition Task Force to steer efforts such as wage and health benefit replacements, retraining and education support, increasing local stakeholder participation in economic development projects, and increasing access to skill-building opportunities. This makes good sense.

**Transportation (Chapter 11)**

For rural residents, a Feebate program offering direct rebates for the purchase of electric vehicles supported by a fee on gas-powered vehicles will be critical to mobility. As the draft plan states, the program should be designed to meet other policy goals, such as offering higher rebates for low-and middle-income consumers and an additional rebate for used zero-emissions vehicles paired with affordable financing options, perhaps connecting a portion of these incentives to a wheels-to-work initiative.

Public transportation systems have always struggled in rural areas and will need adequate operating and capital investments as well as a greater number of destinations and increased frequency. We support encouraging local communities to create innovative options such as micro-transit.

We agree with the Climate Justice Working Group’s warning against policies like the “clean energy supply standard” that could extend reliance on fossil fuel infrastructure and allow emissions from fuel combustion to continue to disproportionately impact Disadvantaged Communities.

A green path forward in the transportation sector involves a re-imagining of a transportation policy that applies rightsizing to roads and vehicles; adaptive, efficient, effective public mass transportation; an evolving green roads network - resulting in a sustainable transportation environment as well as equitable distribution of public transportation resources.

Vehicle size growth is a primary cause of carbon emissions. We see this in the amount of fuel used on 4000 lb. vehicles. Trucks over Class 3 (14,000 #) are rarely needed in urban-suburban settings, but routinely Class 7 (33,000 #) are operated in these congested environments. Using market-based tax policy encouragement, larger vehicles must be taxed to reflect the cost to society of maintaining roads for those vehicles and the excess emissions generated by them with resulting health impacts. Focus road construction to smaller classes of vehicles and roads rated for industrial traffic could be segregated from light commercial and personal vehicle traffic.

Multiple passenger vehicle usage must be encouraged with rewards. With smaller vehicles on the roads, congestion and pollution is reduced; riders of bicycles and scooters and pedestrians are safer.

Rail access for inter-city movement must be prioritized over motor vehicle roadways due to the well documented efficiencies, sustainability, and access to electrical power that a public right-of-way can provide.

Public transit needs to establish networks and facilities that serve the needs of all riders. Current routes and facilities are poorly fitted to low-density suburban areas, discouraging commuters especially with the inconvenience of long waits. The goal must be to use state resources to support development of a modern and environmentally friendly public mass transit system that appeals and serves all income levels. This improves productivity by converting travel time to working time, as well as encouraging nontraditional suburban riders to utilize public transportation. Rural areas must be served more efficiently and effectively with public transportation, especially farm workers.

**Buildings (Chapter 12)**

Replacing fossil gas systems with electricity from renewable sources is an urgent need if we are to have a stable climate. Gas infrastructure needs to be decommissioned. New construction building codes need to prohibit the use of gas appliances and heating systems and ban fossil fuels in new residential buildings as well as the development of advanced energy building codes for renovated residential/commercial buildings. The final plan should offer easily-accessible incentive programs to encourage households and residential building owners to weatherize and undertake upgrades in preparation for future electrification.

**Industry (Chapter 14)**

**Other Energy and Emission-Intensive Industries**

We agree with the finding of the draft plan that: “energy-intensive operations such as data centers and cryptocurrency mining operations have the potential to consume a significant amount of electricity and, in some cases, generate their own electricity from fossil fuel combustion….the additional electricity load could make it more difficult to meet the Climate Act’s zero carbon electricity requirement by 2040.”

Greenidge Generation’s Bitcoin mining operation (Dresden - Yates County - within the 12 county region served by the Roman Catholic Diocese of Rochester) emitted the equivalent of over 220,000 metric tons of carbon dioxide during 2020 (as reported by Grist). The burning of fracked natural gas at this rate will make it extremely difficult for New York to reach the goals needed to achieve a stable climate. The final draft plan should ban the use of fossil fuels as a source of energy for such cryptocurrency operations; and, the Climate Action Council should recommend that New York State adopt a two-year moratorium on the establishment of proof-of-work processing of cryptocurrency in de-commissioned power plants to enable the necessary time and study needed for the development of such regulations to avoid undermining the important goals of the draft plan.

**Agriculture (Chapter 15)**

We must preserve and protect prime farmland and forests. Incentivize siting solar and wind power projects on non-prime farmland. Link prime farmland preservation with a farmer succession initiative to enable new farmers to enter the agricultural sector as current farmers retire/age out. This could help revitalize rural communities across the state and help achieve the reduction in Vehicle Miles Traveled (VMT) as more rural residents find employment closer to home.

The draft plan does not seem to go far enough to reduce emissions from controlled animal feeding operations and industrial agriculture. The final plan must include regulatory and mandatory actions to control methane and rely less on voluntary programs; and, include payments for ecosystem services and soil health to promote more renewable agriculture. New York’s agriculture sector is already impacted by the changing seasons caused by climate change. Small and mid-size family farms needs technical and financial support to implement best climate practices and remain viable.

**Waste (Chapter 16)**

Methane capture and waste diversion are significant local issues due to the presence of large landfills in our region of the state (Seneca Falls, Geneva, Perinton, Chemung County etc). The amount of waste transported into these landfills from out of the region contributes to the problem. The final plan should prioritize reducing waste at its source of creation and state explicitly that biogas captured from waste be limited to on-site use and no new transmission infrastructure should be allowed.

We are happy that the draft includes extended producer responsibility for difficult to manage products and materials and requirements that manufacturers standardize recycling labels and include a set percentage of post-consumer content in products. However, we must adopt a circular model of production that requires manufacturers to take back products at the end of the life-cycle to reuse the resources. New York must continue on a path to limiting as much as possible the use of non-renewable resources and single-use products.

Respectfully submitted on behalf of the Ad Hoc Climate Change Task Force

(members of the Roman Catholic community in the Diocese of Rochester)

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