From: Larissa Matthews
To: erda.sm.scopingplan
Subject: New York's proposed Climate Law will help protect people and wildlife
Date: Thursday, June 30, 2022 12:54:05 AM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Thank you for the opportunity to provide feedback on the Climate Action Council's draft Scoping Plan.

I strongly support New York's proposed Climate Leadership and Community Protection Act (the "CLCPA"), aka the Climate Law, which aims to reduce greenhouse gas emissions, invest in renewable energy, and support environmental justice initiatives that will benefit frontline communities already bearing the largest impacts from the effects of climate change. While I fully stand behind the overall goals of the draft Scoping Plan, I have a few recommendations to ensure the Climate Action Council is making the best decisions for me, my community, and our state:

- The draft plan does not go far enough to reduce emissions from controlled animal feeding operations (CAFOs) and industrial agriculture. I support the Climate Justice Working Group recommendation which favors imposing regulations on dairy and other livestock farmers to reduce emissions. The final plan must ensure that strategies include regulatory and mandatory actions and rely less on voluntary programs.
- The Final Scoping Plan should include the Climate Justice Working Group recommendation of a fertilizer fee to reduce nitrous oxide emissions.
- The Final Scoping Plan should include payments for ecosystem services and soil health to ensure payments go toward capital and on-going expenses of more renewable agriculture. This sector needs technical and financial support to implement the best climate practices.
- The Final Scoping Plan should prioritize the use of on-site biogas over strategies that use Anaerobic Digesters for biogas or biomass for energy to mitigate greenhouse gas emissions on farms.
- For waste justice and climate justice to be reflected in the final plan, it must set goals for decommissioning NYS incinerators and ending contracts with out of state incinerators. The state should not permit any subsidies, nor permit new incinerators, or incineration/burning by other names (inc. pyrolysis, gasification).
- The final plan should recommend a dramatic increase in easily accessible incentive programs to encourage households and residential building owners to weatherize and undertake electrical upgrades in preparation for future electrification. Additionally, the final plan should require an energy audit and basic weatherization and electrical service upgrades before a home can be sold.
- The draft plan's "Explore Technology Solutions" section is largely problematic in its promotion of expanding renewable natural gas, green hydrogen, and nuclear as answers to long duration storage. I join the CJWG in expressing strong concern about the emerging technologies mentioned plus waste-to-energy and bioenergy, as they can lead to the production of more greenhouse gas emissions and/or co-pollutants and are inherently inefficient or unsustainable.
- New York State has some of the most diesel-polluted census tracts in the country. The final plan should recommend targeted policies to electrify facilities with large volumes of truck traffic.
- Replacing fossil gas systems with electricity from renewable sources is an urgent need if we are to have a stable climate and an environmentally just future. The cost of decommissioning the gas system must be spread equitably across rate classes to ensure low to moderate-income households and renters are not left behind in the transition.

I appreciate the work being done by the state of New York to address environmental, climate, sustainability, and justice issues. I am proud to live in a state where the climate crisis is being recognized for what it is—a global emergency. I trust the Climate Action Council will take these recommendations, along with the concerns of other invested citizens, into consideration so the draft Scoping Plan will truly work to ensure a cleaner, more just, and more equitable New York.

Sincerely,

Larissa Matthews