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To: erda.sm.scopingplan
Subject: Public Comment on NY"s Draft Scoping Plan: Buildings Sector
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Thank you for this opportunity to provide comments on the draft scoping plan. As required by New York's nation-leading climate law, the CLCPA, climate and environmental justice must be the driver of the outcomes of this scoping plan. To achieve this, please ensure that the following recommendations on Just Transition are included in the final draft:

The Just Transition section includes many key provisions that prioritize justice for our workers and communities in the transition to a carbon-free economy. Most notably, the Just Transition Principles provide a framework for a transition that is collaborative, community-centered (particularly in reference to disadvantaged communities), and that seeks to uplift equity while emphasizing the need to create high-quality, family-sustaining jobs across all sectors of the new, green economy. Additional highlights of the chapter include the recognized need for accessibility in workforce and career trainings, such as multi-lingual trainings, online and in-person options, and trainings at varied times. It also includes the suggestion to combine green economy workforce development with wraparound services and additional workforce trainings, such as OSHA or U.S. Environmental Protection Agency (EPA) training; the need to fund job recruitment, training, hiring, and retention for DAC minority- and women-owned businesses (MWBEs), service-disabled veteran-owned businesses (SDVOBS), co-ops, and employee-owned businesses; and the need to incentivize stable employment over the gig economy. However, there is ample room for improvement.

The Scoping Plan needs much stronger language on supporting labor standards. Instead of stating that "labor standards should be further evaluated and enhanced" (p. 44), the Scoping Plan must lay out policies requiring prevailing wage and benefits, project labor agreements, and benchmarks for local hire on any projects that use State funds or take place on State property, as well as encourage community benefits agreements. The Scoping Plan should also advance Buy NY and Best Value Procurement policies, leveraging the State's purchasing and contracting power to (a) incentivize job creation along the clean energy,clean transportation, and low-carbon supply chains; and (b) prioritize companies and contractors that support just transition principles including local hire, high-roads jobs, and job access for traditionally excluded populations. Buy NY should also extend to food production. The Scoping plan should support the values-based purchasing standards of the Good Food Purchasing Program already endorsed in NYC and Buffalo that incentivize institutional purchasing from local, organic and BIPOC farms. Buying locally grown food reduces emissions from long- distance transport. Fresher foods are healthier, and foods grown in healthier soils that by NYS law definition have higher levels of soil carbon are more nutrient dense.

Furthermore, the chapter fails to adequately lay out a plan to directly support displaced workers, instead focusing on (re)training opportunities—continuing education, Registered Apprenticeship programs, certifications, and licensing in trades. While these are all essential, they are in no way the complete picture of direct support. The Climate Action Council should recommend the establishment of a Worker and Community Assurance Fund. Such a fund would provide direct support to workers in fossil fuel-dependent industries and to

communities who rely on fossil-fuel dependent industries, including pension support and wage replacement for displaced workers matching their current salaries as well as expanded funding for lost tax base to local governments and school districts. The State should also ensure the use of a Workforce Assessment Plan where fossil fuel plants are decommissioned to keep impacted workers informed on job creation and losses to give impacted workers the opportunity to contribute to the transition process and to accommodate workers' career and retirement plans into transition planning.

The chapter should also expand its focus beyond the power generation sector, exploring the impacts and opportunities in all other sectors. For instance, according to the State's research, the transportation sector is the only sector to face net displacement, while the buildings sector is expected to be responsible for over half of all sub-sector employment growth. The realities of this shifting workforce should be explored outside of workers directly employed in the fossil fuel industry.

Finally, the chapter should incorporate language around including not only displaced workers and disadvantaged communities in the reshaping of a green economy workforce, but also groups who have been traditionally excluded from the green workforce, such as women and the formerly incarcerated. And as steps are taken to remedy these issues, the Climate Action Council should lay out specific strategies the State will take to ensure these just transition principles are met, something the Scoping Plan lacks in its current iteration.

REGARDING PUBLIC HEALTH

A sectoral and economic transformation is key to alleviating the impacts that we collectively face with climate change. In New York, there are significant disparities in health outcomes for certain groups by age, race, ethnicity, and socioeconomic status. Adopting and enforcing a just transition will decrease our current response to or inability to respond to negative climate impacts such as threats to infrastructure like saltwater intrusion, help workers advocate for better protections and safety standards, reduce their risk of harm or injury, and improve overall health equity. It will also help make sure the green workforce has benefits, including access to affordable healthcare.

Sincerely,

Georgianna Page