From: Sharon Longyear
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 the Land Use and Local Government Sector are included in the final draft:

The Land Use and Local Government sector put forth strategies that are substantive, well-developed and aligned with the advisory panel recommendations. In New York, there are more than 28 million acres of natural and working land. Land use directly affects the state's carbon emissions, sequestration, and storage. Leadership and decisions of local governments play a key role in determining how successful we are in achieving the goals of the Climate Leadership and Community Protection Act (CLCPA).The final Scoping Plan should address:

Local governance structures and appointments to the Regional Economic Development Councils (REDCs) need to be reformed to diversify these bodies to adequately represent the DACs that will be affected by their decisions.

Transit oriented development (TOD)/equitable transit oriented development (E-TOD) and smart growth strategies focus on increasing commercial and residential density as well as introducing transit options like rail and bus in areas that can accommodate additional growth, like suburbs. However, growth can be problematic for DACs in denser areas and lead to gentrification. The definition of TOD/E-TOD needs to include preparing communities for a Just Transition, rather than simply striving for development and growth, while also addressing other needs that may not have anything to do with growth.

Mitigation strategies should equally balance multiple priorities to address the need for pollution prevention, green infrastructure, open spaces, and other environmental improvements to reduce co-pollutants in disadvantaged communities.

There is a missed opportunity to promote sustainable and resilient industrial development in compliance with the CLCPA's commitment to a just transition.

The scoping plan must recognize and acknowledge the differences in needs between rural, suburban, and urban areas. Smart growth and TOD solutions need to be contextual, and localities have the insider knowledge to provide the best pathways forward.

Many recommendations put the onus on the State/state agencies (NYSERDA, DEC, etc) to initiate programs, provide technical assistance, streamline funding and permitting processes. While this should be the responsibility of the state, there should be equal importance given to partnering with local community-based organizations to uplift the needs/requirements of local communities. Members of DACs should be engaged in the planning and implementation of projects in their communities, with a process that prioritizes community-centered visions.

REGARDING PUBLIC HEALTH

New York's forests hold an estimated 1,911 MMT of carbon. Forestlands contribute to carbon sequestration each year and state air and water quality, and our own mental and respiratory health. Unfortunately, forestlands are under pressure from development and forest conversion, which is causing a steady decline in the amount of CO2 absorbed each year. Without proper CCS technology, forests play a critical role in preventing emissions, as forests sequester and store much more carbon than any other land use in New York. Reflective of the comments of the Climate Justice Working Group, there must be more focused efforts towards addressing:

Resilient infrastructure fund needs to prioritize frontline communities
Maintaining an ongoing analysis of health implications of new climate projections on heat increases
Directly funded efforts to build and maintain nature based infrastructure and natural areas
Adopting explicit land use strategies to reduce GHG emissions and co-pollutants in disadvantaged communities
Increasing concentrated efforts to avoid burdening disadvantaged communities in prioritizing conservation areas and degrowth of high climate risk and ecologically sensitive areas

Sincerely,

Sharon Longyear