From: Valerie Juang
To: erda.sm.scopingplan
Subject: Public Comment on NY"s Draft Scoping Plan: Buildings Sector
Date: Friday, June 10, 2022 5:25:08 PM

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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 Industry Sector are included in the final draft:

The scoping plan emphasizes low-carbon procurement, workforce development, and incentive-based measures, and posits that near-term emissions reductions will come from energy efficiency and limited electrification, while longer-term reductions will depend on innovation including low-carbon fuels and carbon capture and storage (CCS).

The final scoping plan must clarify that this chapter's objective is to promote climate and environmental justice, not business development. As the Climate Justice Working Group emphasized, it is essential that BIPOC communities are involved in creating workforce development programs. Moreover, there must be support and leverage of public procurement to promote low-carbon materials; demand-side changes may be made to reduce materials waste.

The sector of this chapter must omit any reliance on carbon capture and sequestration, (CCS) which is not a true zero-emissions measure. Furthermore, the final plan should call for a moratorium on "proof of work" cryptocurrency mining—an enormously energy-intensive industry that threatens our climate goals—until a full environmental impact statement can be completed.

Finally, industrial heat should be electrified wherever feasible. Reliance on green hydrogen must be limited, especially where hydrogen combustion would overburden disadvantaged communities. We need data collection and reporting requirements to accurately show how industrial facilities impact these communities.

REGARDING PUBLIC HEALTH

This section lacks vital information on the public health impacts of industry on disadvantaged communities. While the sector mentions that combusting hydrogen can produce harmful levels of nitrous oxide emissions (NOx), it does not address the other pollutants it produces. Current technologies that attempt to control emissions are far from ready. Further, the negative health impacts created by hydrogen disproportionately impacts disadvantaged and low-income communities.

Sincerely,

Valerie Juang