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On the ground - and at the table

## **New York City Environmental Justice Alliance Testimony Supporting Intro 270 and Intro 1720**

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Founded in 1991, NYC-EJA is a nonprofit citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. Our alliance is a key advocate of strong and equitable renewable energy targets as well as emissions reductions efforts because many of the communities we represent are overburdened by the clustering of power plants and other polluting infrastructure in their neighborhoods.

Generally, NYC-EJA is supportive of the intention of both Intro 270 and Intro 1720. Addressing New York City's carbon emissions in an equitable and rapid manner requires long-term plans for city agencies and robust accounting. New York has less than 10 years to limit global warming to 1.5 degrees Celsius, which will require rapid system transitions in energy, urban infrastructure, and industrial systems – and an unwavering commitment from New York City agencies.

### **Equitable Implementation of Long-term emissions plans**

Long-term emissions plans for city agencies must take into account equity and environmental justice. While New York City has made commitments to reduce carbon emissions and increase investments in climate resiliency, progress so far has been slow to reach low-income communities and communities of color. These communities also face many obstacles to participating in the clean energy economy and current programs are ultimately failing at systematically addressing the root causes of energy insecurity and energy poverty.

### **Concerns about Carbon Neutrality & Offsets**

We agree that carbon accounting should be a priority in the annual Executive Budget. However, NYC-EJA has strong concerns about the efficacy and equity of mechanisms that have been proposed to achieve “carbon neutrality”, including cap-and-trade, offsets, and other carbon trading mechanisms in both lowering total emissions and protecting environmental justice communities from carrying the burden of fossil fuels. From an environmental and climate justice perspective, carbon neutrality is problematic for several reasons:

- A carbon-neutral economy may create loopholes that set back NYC’s efforts to address climate change, including carbon offsets that may not actually result in a net decrease in air pollution. We are already seeing the pitfalls of offsets in California’s carbon trading system. A recent study shows that the program leans heavily on carbon offset credits, and as a result, California may have overstated their emissions reductions by 80 million tons of carbon dioxide — a third of the total cuts that the state’s cap-and-trade program was expected to achieve in the next decade.
- Relying on carbon offsets to achieve our emissions reductions can perpetuate the disproportionate pollution impacts on communities of color in New York City. A polluter could invest in reforestation hundreds of miles, or even continents away, to “offset” the carbon they release into the atmosphere while doing nothing to alleviate the root cause of asthma attacks, lung disease, and other harms facing New York’s environmental justice communities.
- Working toward carbon neutrality rather than 100% emissions reductions could allow New York City to procrastinate on its emissions reductions goals. Carbon offsets could allow polluters to continue consuming fossil fuels at untenable rates while benefiting from loopholes in a carbon offset market that would lead to a net increase in greenhouse gas pollution. Regardless of the number of trees we plant, we cannot continue to burn fossil fuels at our current rate without dire consequences for the planet – and for environmental justice communities at the frontlines of fossil fuel infrastructure.

### **Concerns about Renewable Energy Credits in LL97**

Monitoring and enforcing energy efficiency targets should be an essential part of the city’s long term emissions planning. NYC-EJA has concerns about potential trading schemes and alternative compliance mechanisms that may inhibit these goals

We are particularly concerned that Local Law 97 of 2019, the energy efficiency mandate for large buildings, allows building owners to use an unlimited number of Renewable Energy Credits (RECs) as a means for compliance, which may allow for continued localized emissions while purchasing in renewable energy that may be sited outside of city limits.

### **Concerns about Energy Efficiency Trading Scheme in LL97**

We are also concerned about the upcoming energy efficiency credit trading study as part of LL97. NYC-EJA and our allies are suspicious of market- and trading-based carbon solutions.

While LL97 highlights the unproven potential for building investments in environmental justice communities, it ignores the potential pitfalls and disproportionate burdens a trading scheme could have on low-income communities and communities of color. We fear that if applied to the energy efficiency goals for NYC, the largest and most polluting building owners will be able to avoid making necessary improvements to their own buildings by making minor investments in rent-regulated and underserved buildings. We need every building to make deep retrofits in order to reach our emission reduction goals.

Developing an efficiency trading scheme will require unnecessary bureaucracy/systems when direct investments on both sides would be a more streamlined way to achieve emission reductions/efficiency.

The Climate Works for All Coalition has developed a proposed \$1 billion budget ask that includes support for energy efficiency upgrades for affordable housing and LMI homeowners and tenants. Direct financial support will guarantee that disadvantaged communities actually benefit from energy efficiency investments, whereas a trading scheme is untested and unreliable.

### **Concerns about Canadian Hydro**

Finally, we are concerned that the City's commitment to 100% clean electricity by 2050 relies largely on importing hydropower from Quebec. This requires the construction of a 330-mile-long underground high-voltage transmission cable, called the Champlain-Hudson Power Express (CHPE), to bring power from Canada down to NYC. The nearly \$20 billion project would lock NYC into long-term dependence on Canadian hydropower while inhibiting local offshore wind, solar and other renewable industries from developing.

We have concerns about the ecological and social impacts of hydropower, including the potential exposure of Indigenous communities in Canada to poisonous methyl-mercury from dam construction, and the potential exposure to PCBs that may result from constructing the CHPE under the Hudson River, the nation's largest Superfund site. A recent study also shows that the city's sourcing of hydropower may actually increase overall State carbon emissions by drawing hydropower away from other parts of the state that currently source from HydroQuebec, and would consequently have to switch to fossil fuel power.

Thank you for the opportunity to raise these concerns. We encourage the city to develop long-term emissions plans for agencies that meaningfully and equitably drive down greenhouse gas emissions without giving in to false solutions.