



June 15, 2023

New York City Environmental Justice Alliance Testimony on Intro 0611-2022 and Int 0983-2023

Good afternoon Chair Gennaro and members of the Council. My name is Daniel Chu, and I am the Energy Planner at the New York City Environmental Justice Alliance (NYC-EJA). Founded in 1991, NYC-EJA is a non-profit citywide membership network linking 13 grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice.

NYC-EJA is encouraged to see that the city is proposing to do a carbon accounting bill to track emissions from all government operations, and thank councilmember Brannan and this committee for initiating this effort. However, NYC-EJA is seriously concerned about the language of this bill and how it will inadvertently harm the environmental justice communities that we serve. Our concerns broadly fall into the following two points:

1. The use of 100-year Global Warming Potential 100-year (GWP 100) instead of 20-year Global Warming Potential (GWP 20)
2. The reliance on carbon offsets or mitigation, including carbon capture & sequestration or chemical decomposition of CO₂

The use of GWP 100 is inconsistent with New York State's accounting for CO₂e emissions, which uses a GWP 20 scale. We are in a climate emergency, most recently evidenced by the skies outside this chamber last week. Misaligning the way New York City accounts for Greenhouse Gas Emissions will disproportionately discount co-pollutants from power plants, waste transfer stations, and highways and have historic and ongoing harm on the quality of life in environmental justice communities. The State's Climate Law intentionally chose to use the 20-year timeframe because that is what all of the science has led to as being accurate for methane. Given that many of the city's polluting operations rely on methane, most commonly in the form of natural gas, going to a 100-year timeframe will severely underestimate the impact of emissions from City operations like buildings and transportation. It could also extend the city's dependency on methane-rich fuels and undermine New York City's roadmap to 80% emissions reduction by 2050. NYC-EJA vehemently opposes any effort to undermine Climate Leadership and Community Protection Act, and this bill could give climate deniers and fossil fuel operators the momentum to do so. The City must move faster, not slower, in achieving an emissions-free economy, and a science-based accounting of our emissions can help us achieve that.

We further urge the City Council to tread very carefully regarding the accounting of carbon offsets and carbon mitigation. Carbon offsets have no globally proven monitoring, reporting, and verification mechanisms. The vast majority of carbon offset projects, from airlines to banks to technology companies that claim to be net-zero, are falsified or significantly inaccurate. Studies from the European Union to California to the Amazon have shown a less than 10% accuracy of offset emissions purchased to date.¹²³ This means that at least 90% of carbon offsets potentially reported by city agencies will not result in real emission reductions. Purported carbon mitigation technologies such as carbon capture and sequestration continue to pose co-pollutant concerns that contribute to worsening air quality and pose questions about how to safely transport and store CO2 without increasing truck traffic or creating fire and earthquake hazards. Relying on carbon offset and carbon mitigation to calculate net carbon impact presents a false picture of how much each agency and the entire city government contributes to our climate and public health crises.

Separately, NYC-EJA commends the proposed bill to mandate building solar panels in certain city-owned parking lots. Recent studies have shown that building solar on parking lots can greatly augment distributed energy generation capacity and reduce our reliance on fossil fuels quickly and effectively. France recently passed a similar bill that could generate up to 10% of the nation's electricity. The Inflation Reduction Act has enabled New York City to receive direct funding from the federal government to construct solar panels, followed up New York Power Authority's new ability to build renewable energy, mandating the Department of Citywide Administrative Services to build solar canopies on viable parking lots can contribute significantly to greening our electricity grid. We recommend the City go one step further and mandate the installation of battery storage units at eligible parking lots. Co-siting solar and storage can greatly augment solar canopies by storing power generated during the day and discharging stored power during the early evening when power plants are most likely to operate and pollute at high capacity to satisfy electricity demand. Co-siting solar and storage may further enable the city to directly charge electric vehicles parked at city-owned parking lots. Lastly, we further urge that DCAS prioritize the deployment of these solar canopies at environmental justice communities and utilize these infrastructures to reduce pollution and energy bill burden for nearby residents.

¹ Badgley, Grayson, et al. "Systematic over-crediting in California's forest carbon offsets program." Global Change Biology, October 20, 2021.

² Cames, Martin, et al. "How additional is the Clean Development Mechanism?" Institute for Applied Ecology, March 2016.

³ West, Thales, et al. "Overstated carbon emission reductions from voluntary REDD+ projects in the Brazilian Amazon." Proceedings of the National Academy of Sciences of the United States of America, Vol 117, No 39, September 14, 2020.