



New York City Environmental Justice Alliance

462 36th Street, 3F, Brooklyn, NY 11232 | www.NYC-EJA.org

On the ground – and at the table.

**Testimony on the City's Obligation to Reduce Carbon Emissions from Government Operations - Committee on Environmental Protection, Waterfront, and Resiliency
New York City Council
December 12, 2023**

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens by the coordination of campaigns designed to inform City and State policies. Through our efforts, member organizations coalesce around specific common issues that threaten the ability of low-income communities of color to thrive. NYC-EJA is led by the community-based organizations that it serves.

New York City is not doing enough to reduce carbon emissions from government operations. The City government is required to reduce 40% of its emissions by 2025 and 50% by 2030, contributing to the citywide goal of 80% emissions reduction by 2050 and complying with the State's net zero by 2050 mandate. Beyond government operations, the administration is also contributing little to the 1,000 MW of solar by 2030 and 500 MW of energy storage by 2025 citywide targets.

The City has set out to install 100 MW of solar on city properties by 2025. This goal was established nearly 10 years ago; however, the latest data from the Department of Citywide Administrative Services (DCAS) show only 16.2 MW of operating solar generation capacity and a total of 46 MW of solar in development. With less than 2 years left to achieve this goal, the city government is woefully behind and not on track to meet this commitment.

NYC public school buildings are some of the most polluting City-owned buildings, and these schools make up nearly one-quarter of all City-owned buildings. There is huge potential for the City to reduce government emissions by improving energy efficiency and electrifying public schools. While the "Leading the Charge" initiative was a start, there is so much more to be done. As a first step, Mayor Adams must allocate the remaining \$2.3 billion of the said \$4 billion in funds, prioritizing the electrification of 100 schools among other proposed measures under Leading the Charge, and commit additional funds to retrofit schools in dismal conditions.

Beyond dragging our feet in reducing emissions from City-owned properties, the Department of Environmental Protection (DEP) is also displaying lamentable inertia in reducing their emissions.

Wastewater treatment is the second highest source of emissions in government operations behind buildings. A third of wastewater treatment emissions come from fugitive methane because DEP is producing an excessive amount of biogas from the city's Wastewater Resource Recovery Facilities (WWRFs). The Newtown Creek anaerobic digester had only functioned for a mere couple of weeks before being taken offline, but DEP still plans to go ahead with building new anaerobic digesters across the city and diverting organic waste from composting, a process that actually sequesters carbon and contributes to our city's soil health. Although NYC-EJA believes that anaerobic digestion has a part in New York's clean energy future, DEP's current path is irresponsible and puts communities in harm's way. This is exacerbated by the Mayor's November financial plan to completely eliminate community composting with no commitments to composting the majority of organic waste collected by the Department of Sanitation. These budget cuts put into question the administration's strategy to convert organic waste into natural gas for heating fuel. No effort has been made to reduce the amount of fugitive methane that has been escaping from the city's Wastewater Resource Recovery Facilities, and residents from Greenpoint and Williamsburg are constantly being exposed to flared excess biogas in their own neighborhood, contributing to air quality issues while National Grid uses the generated biogas as an excuse to increase gas bills.

We are further concerned about the City's goals to become the nation's first East Coast city to transition its heavy-duty vehicle fleet to renewable fuel. The City must fend off fossil fuel industry-led efforts to incorporate "renewable diesel" and other non-zero emissions fuels in its future policies to ensure we meet our climate targets. Non-zero emissions fuels, such as renewable diesel, are designed to prolong the life of fossil fuel infrastructure and/or require significant modifications to existing infrastructure, including storage and distribution systems. Instead, the City should pursue an electrification-first transportation strategy and only allow carve-outs for genuinely hard-to-electrify transportation sectors, such as shipping and aviation. New York State adopted the Advanced Clean Cars II regulation earlier this year, requiring all new passenger cars, trucks, and SUVs sold in New York to be zero-emissions. California recently adopted the Advanced Clean Fleets (ACF) package of regulations that will deploy medium- and heavy-duty zero-emission vehicles (ZEV) everywhere feasible. New York State can be the first state to emulate this plan. The City should advocate for the State to adopt policies such as ACF regulations to help transition its fleet to zero emissions.

Reducing emissions from City government operations is necessary for the climate and health of all New Yorkers. City government can lead the way in spearheading environmental protection, but what we are seeing today is an administration that only provides surface-level programmatic design without real labor, funding, and implementation efforts when the time to act on meeting these goals and obligations is quickly closing. The City must limit biogas generation, reject alternative fuels, block carbon capture and storage, refund community composting, compost organic waste, electrify buildings and fleet, and build solar and energy storage. These are the proven and scalable solutions that must be funded and implemented today.