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BARBARA LIFTON  
125<sup>th</sup> District  
Tompkins & Cortland Counties

Legislative Commission on Rural Resources

May 30, 2014

Attn: 2014 Draft State Energy Plan Comments  
NYSERDA  
17 Columbia Circle  
Albany, NY 12203-6399

Dear Chairman Rhodes:

Please consider the following comments on the 2014 Draft New York State Energy Plan. I am submitting these comments on behalf of concerned constituents of my district in Tompkins and Cortland counties.

The 2014 Draft New York State Energy Plan seeks to offer “a vision for New York’s energy future that connects a vibrant private sector market with communities and individual customers to create a dynamic, clean energy economy.”<sup>1</sup> By leading off with this image, the Plan recognizes that a shift to clean energy is a major priority for New York, yet presents no clear path to this goal. Recognizing the “likelihood of severe, disruptive climate impacts.... [p]articular attention is given in this plan to protecting human health and the environment from the adverse impacts of climate change.”<sup>2</sup> Yet the plan has major shortcomings in moving New York towards these goals, projecting an increased reliance on natural gas and coal by 2030, with renewables and hydroelectric remaining flat. To provide a real path to clean energy, including creation of a world-leading renewable energy technology sector in New York, and true energy independence the Plan must: 1) use the latest climate change reports, including the heightened warnings by the IPCC requiring urgent action, 2) provide concrete benchmarks to ensure consistency with established state climate goals, and 3) encourage a rapid, renewable energy build out and avoid the untenable situation of undertaking major infrastructure upgrades for fossil fuels (i.e. pipelines) at the expense of prioritizing renewable energy investments.

On March 31, 2014, the International Panel on Climate Change released their latest report on the severity of climate change impacts across the world. The report, in its “Impacts, Adaptation, and Vulnerability: Summary for Policy Makers” section makes the effects of climate change clear and warns that negative impacts are already occurring across the world.<sup>3</sup> These effects include “negative impacts of climate change on crop

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<sup>1</sup> 2014 Draft New York State Energy Plan , 6, <http://energyplan.ny.gov/>

<sup>2</sup> Id at 8.

<sup>3</sup> IPCC, *Fifth Assessment Report (AR5), Impacts, Adaptation, and Vulnerability: Summary for Policy Makers* (March 31, 2014), available at [http://ipcc-wg2.gov/AR5/images/uploads/IPCC\\_WG2AR5\\_SPM\\_Approved.pdf](http://ipcc-wg2.gov/AR5/images/uploads/IPCC_WG2AR5_SPM_Approved.pdf).

yields,” as well as “climate-related extremes, such as heat waves, droughts, floods, cyclones, and wildfires, reveal[ing] significant vulnerability and exposure of some ecosystems and many human systems to current climate variability.”<sup>4</sup> The report asserts that “[c]limate-related hazards exacerbate other stressors, often with negative outcomes for livelihoods, especially for those living in poverty.”<sup>5</sup> Now, the world’s leading scientists have “found that decades of foot-dragging by political leaders ha[ve] propelled humanity into a critical situation, with greenhouse emissions rising faster than ever.”<sup>6</sup> These scientists predict “drastic effects, such as the collapse of ice sheets, a rapid rise in sea levels, difficulty growing enough food, huge die-offs of forests, and mass extinctions of plant and animal species.”<sup>7</sup> As of May 2014, scientists discovered that the vast West Antarctica ice sheet is melting uncontrollably and will lead to, at least, a four foot rise in sea levels.<sup>8</sup> The catastrophe of polar ice sheet melt appears to be intractable. Closer to home, the National Climate Assessment (NCA), released on May 6<sup>th</sup>, details large-scale changes across the United States from warming that has occurred over the last century.<sup>9</sup> Making an appeal for urgent action, the NCA brings these concerns into focus, stating that “climate change, once considered an issue for the distant future, has moved firmly into the present.”<sup>10</sup>

The 2014 Draft New York State Energy Plan also shows concern for climate impacts, highlighting the “unequivocal warming of the Earth over the past century” and warning that “intense and damaging storms like Irene and Sandy are occurring more often.”<sup>11</sup> Yet, the Energy Plan’s information is based on the 2007 IPCC report, which fails to capture the latest and gravest concerns of scientists from around the world, as reflected in the 2014 IPCC Fifth Assessment Report and the NCA. The Plan hints at an understanding of the severity of climate variability to New York, with Hurricane Sandy alone costing the state more than \$30 billion in damage, while simultaneously recognizing the likelihood that vulnerability and impact cost assessments in the NYSERDA ClimAid report “may be conservative” based on the recent destructive storms in the state.<sup>12</sup> Today, not in the future, is the time that New York must act decisively on climate change, in light of the latest warnings. The costs to our state, and world, are clear, if not “conservative” in their estimates.

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<sup>4</sup> *Id* at 7.

<sup>5</sup> *Id* at 8.

<sup>6</sup> Justin Gillis, *Climate Efforts Falling Short, U.N. Panel Says*, NEW YORK TIMES, April 13, 2014, available at <http://www.nytimes.com/2014/04/14/science/earth/un-climate-panel-warns-speedier-action-is-needed-to-avert-disaster.html>

<sup>7</sup> *Id*.

<sup>8</sup> Justin Gillis and Kenneth Chang, *Scientists Warn of Rising Oceans From Polar Melt*, NEW YORK TIMES, May 12, 2014, available at <http://www.nytimes.com/2014/05/13/science/earth/collapse-of-parts-of-west-antarctica-ice-sheet-has-begun-scientists-say.html>

<sup>9</sup> U.S. Global Change Research Program, *Climate Change Impacts in the United States: The Third National Climate Assessment*, (May 6, 2014), available at <http://nca2014.globalchange.gov/report>

<sup>10</sup> Justin Gillis, *U.S. Climate Has Already Changed, Study Finds, Citing Heat and Floods*, NEW YORK TIMES, May 6, 2014, available at <http://www.nytimes.com/2014/05/07/science/earth/climate-change-report.html>

<sup>11</sup> 2014 Draft New York State Energy Plan, Volume 2: Impacts and Considerations, 9, <http://energyplan.ny.gov/Plans/2014.aspx>

<sup>12</sup> *Id* at 172.

To date, New York’s policy to curb global warming is based on Governor Paterson’s Executive Order #24, also continued by Governor Cuomo, which calls for NYS to reduce greenhouse gas emissions 80 percent by the year 2050.<sup>13</sup> Order #24 also established the New York Climate Action Council which released their Interim Report on November 9, 2010, agreeing with leading climate scientists that the effects of climate change are already upon us and immediate action is required to mitigate emissions, including methane.<sup>14</sup> Unfortunately, several trends in the Energy Plan indicate an increased reliance on fossil fuels, including natural gas, due to projected low prices, despite the known costs and risks which will far outweigh any short to medium-term perceived benefits. The plan clearly states that natural gas is the “current fuel of choice for new and replacement generation in New York.”<sup>15</sup> Yet, in the context of climate change concerns, natural gas is not a viable alternative to limit the dangerous release of greenhouse gas into our atmosphere.

A 2011 study by Robert Howarth, Renee Santoro and Anthony Ingraffea, comes to the conclusion that “[a] complete consideration of all emissions from using natural gas seems likely to make natural gas far less attractive than other fossil fuels in terms of the consequences for global warming.”<sup>16</sup> Methane is an extremely potent greenhouse gas, up to 105 times more powerful per molecule than CO<sub>2</sub> over a twenty year timeframe. In a follow-up report from April 22, 2014, Howarth presents a thorough analysis of data and studies since the original 2011 work, concluding that “both shale gas and conventional natural gas have a larger greenhouse gas footprint (GHG) than do coal or oil, for any possible use of natural gas...”<sup>17</sup> Of particular importance, the newest information, including research from the IPCC and Harvard researchers, among others, confirms that “[a]n increasing body of science is developing rapidly that emphasizes the need to consider methane’s influence over the decadal timescale, and the need to reduce methane emissions.”<sup>18</sup> Methane emissions are of particular concern over the 20-year (decadal) timescale, rather than the 100-year timescale typically used for CO<sub>2</sub>, given the increasing urgency to address climate change, with impacts already occurring across the globe. Indeed, it is clear that if we fail to reduce methane emissions, we will fail to effectively combat rising temperatures in the near-term, as “[a]t the 20-year timescale, total global emissions of methane are equivalent to over 80% of global carbon dioxide emissions.”<sup>19</sup> Unless these emissions are reduced immediately, temperatures are expected to increase to

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<sup>13</sup> Exec. Order No. 24 (Aug. 6, 2009), *available at*

<http://www.nyclimatechange.us/ewebeditpro/items/O109F22395.PDF>

<sup>14</sup> NYSERDA, *NY State Climate Action Plan Interim Report*, 457 (Nov. 9, 2010), *available at*

<http://nyclimatechange.us/InterimReport.cfm>

<sup>15</sup> 2014 Draft New York State Energy Plan, Volume 2: Impacts and Considerations, 32,

<http://energyplan.ny.gov/Plans/2014.aspx>

<sup>16</sup> Robert Howarth, PRELIMINARY ASSESSMENT OF THE GREENHOUSE GAS EMISSIONS FROM NATURAL GAS OBTAINED BY HYDRAULIC FRACTURING at 1, *available at*

<http://www.technologyreview.com/blog/energy/files/39646/GHG.emissions.from.Marcellus.Shale.April12010%20draft.pdf>

<sup>17</sup> Robert Howarth, A BRIDGE TO NOWHERE: METHANE EMISSIONS AND THE GREENHOUSE GAS FOOTPRINT OF NATURAL GAS at 1, *available at* <http://onlinelibrary.wiley.com/doi/10.1002/ese3.35/full>

<sup>18</sup> *Id* at 9.

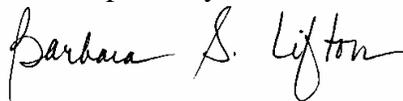
<sup>19</sup> *Id* at 8.

levels that will result in unstoppable feedback loops and greater emissions through, for example, melting of methane clathrates in the oceans, and thawing of the permafrost which has locked up vast amounts of greenhouse gases in the soil.<sup>20</sup>

The New York State Energy Plan is inadequate in addressing the critically-important efforts needed to curb GHG emissions. By indicating a preference for and continued reliance upon fossil fuels of any type, the plan will utterly fail to consider the long term interests of our children and future generations, despite the recognition that costs from storms and other impacts to our state will ultimately greatly outweigh the costs associated with ramping up a large-scale shift to existing, viable, and economic renewable energy technologies. As the latest Howarth study says, “to replace some fossil fuels (coal, oil) with another (natural gas) will not suffice as an approach to take on global warming.”<sup>21</sup> A continued reliance on fossil fuels from out-of-state makes even less sense, in the context of the significant opportunities for a clean energy economy in New York. The Energy Plan recognizes that the Kauffman Foundation has “identified New York as one of the top ten states prepared to capitalize on the opportunities provided by a knowledge-based economy,” and highlights, from a Brookings Institution study, that the New York Capital Region has the “highest concentration of clean energy jobs anywhere in the country” and that New York has ten percent of the nation’s green jobs, between 90,000 and 140,000, ranking second nationally.<sup>22</sup> The Energy Plan needs to avoid a large build out of infrastructure for fossil fuel usage, and move quickly to in-house renewable systems, creating jobs and becoming a world leader in green energy and energy conservation technology in the process. Only by establishing concrete actions and measurable targets to achieve a shift to renewable energy, while working to mitigate the negative effects to regions of the state dependent upon the existing GHG economy, will the Energy Plan be able to take a comprehensive, bold approach to position New York as a leader for the new economy of the next century.

New York State needs to heed these warnings, using the latest data, and take immediate action through its Energy Plan to address the most important issue of our time - Climate Change.

Respectfully submitted,



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Member of Assembly  
125<sup>th</sup> District

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<sup>20</sup> *Id.*

<sup>21</sup> *Id.* at 11.

<sup>22</sup> 2014 Draft New York State Energy Plan, Volume 2: End Use Energy, 107-8, <http://energyplan.ny.gov/Plans/2014.aspx>