



SIERRA CLUB
ATLANTIC CHAPTER

Memorandum of Opposition

March 31, 2023

S.6030 (Parker)/A.6039 (Barrett)

Purpose: An act amending the environmental conservation law and the public service law, in relation to the state greenhouse gas emission accounting system.

Statement of Opposition: The proposed bill (S.6030/A.6039) would undermine a core pillar of the Climate Leadership and Community Protection Act and NY's emissions reduction plans, accelerate climate change impacts and risks, and undercut New York's climate leadership. The 2019 Climate Leadership and Community Protection is a landmark climate bill not only for its ambitious emissions reduction and clean energy targets and environmental justice provisions, but for its forward-looking, scientifically-rigorous greenhouse gas accounting.

Since the CLCPA's passage, NY has used a 20-year Global Warming Potential (GWP) for climate pollutants, including methane. Global warming potential is a way to measure and account for the warming effect of different gasses both in intensity of effect, and over different timescales. Most notably, methane lasts for a shorter period of time in the atmosphere than carbon dioxide, but it has a much larger effect on warming in that time period. (Methane is 27-30 times more potent than carbon dioxide when looked at on a 100 year time frame. Methane is 81-83 times more potent than carbon dioxide when observed on the 20 year time frame)

By using a 20-year Global Warming Potential, NY is weighing more accurately the detrimental impact of every ton of methane released over the next 20 years. Our earth systems and ecosystems are approaching "tipping points," thresholds that are already leading to life-altering disruptions in weather patterns, water and food supplies, and cascading effects that cannot be undone even if we're able to slash our emissions at mid-century. Wildfires, droughts, massive tree die-offs, species extinctions, mass migrations of people, drying peatlands, and permafrost thawing are just a few of the outcomes that will intensify. All these dire catastrophes could put an additional and difficult-to-predict level of greenhouse gases into the atmosphere just as emissions are supposed to be declining. Recent research shows that based on its catastrophic near-term warming effects, methane emissions alone are pushing the planet perilously close to climate tipping points.

Whether New York and the rest of the world are going to be able to reduce fossil fuel combustion to keep warming below 1.5 degrees celsius is a question that will be decided in the next 20 years, and requires strategies that accurately reflect the potency of methane on that timescale.

The IPCC's decision to use a 100-year Global Warming Potential as the standard for all gasses is a reflection of compromise to find a metric that cuts across multiple greenhouse gasses, and was agreed to decades ago, before the magnitude and intensity of methane's impacts were fully understood, and before it was understood how quickly the planet would approach critical climate tipping points.

Climate change, which has been primarily driven by the burning of fossil fuels like methane gas in our power plants, homes, vehicles, and factories, is not a crisis that we have 100 years to solve. Those alive today, as well as our children and grandchildren will be living with its effects. Modeling shows that the near-term cooling benefits of using a 20-year GWP that focuses more attention on shorter-lived but more potent climate pollutants like methane will buy the planet critical decades to develop strategies to address longer-lived climate pollutants.

The NYS legislature, and government leaders and policymakers today, have a responsibility to accurately measure and assess the impact of actions taken today on the climate and the citizens of New York. We strongly urge opposition to this bill, which would artificially create the impression that methane gas is less bad for climate change than it actually is, and would serve as a giveaway to the fossil fuel industry who are looking to prolong the transition to clean energy.

Changing New York's climate accounting would be tantamount to a soda company enacting legislation that counts calories from a sugary drink as only 1/3 of a calorie. This wouldn't change the impact on people's bodies from drinking soda, it would just misinform the habits of those looking to consume less caloric drinks and make healthier choices. S.6030 won't save New York from impending climate disaster; it will just take the heat off of the gas companies that are currently speeding us toward the brink.

Additionally, Sierra Club opposes Section 7 of this bill, which would discount the CO2 emissions from the combustion of biomass and biofuels. This provision contravenes the CLCPA, and further ignores the realities of accelerating climate change from combustion. Emissions for biomass are by no means carbon neutral on the increasingly short climate time scales that the planet is now operating under. A forest that regrows its biomass in 100 years will not help avoid climate catastrophe in the next 20 after we burn it for fuel. And no accounting gimmick or sleight of hand can change that reality.

The Sierra Club Atlantic Chapter urges you to oppose S.6030/A.6039 to uphold the Climate Leadership and Community Protection Act and protect New Yorkers.