

To submit comments:

Online, via comment forms at climate.ny.gov

E-mail to ScopingPlan@nyscrda.ny.gov

By mail to Draft Scoping Plan Comments, NYSERDA,

17 Columbia Circle, Albany, NY 12203-6399 Comments must be submitted or postmarked by July 1, 2022

Thank you for extending, until July 1, the public comment period for the "New York State Climate Action Council Draft Scoping Plan", on which these comments are submitted. Many aspects of this plan are totally unrealistic, completely unaffordable, and clearly unfair, especially to those of us in rural areas. It seems the plan hinges on expectation of the use of electricity for all transportation needs (Chapter 11) and all building energy consumption (Chapter 12), much by 2030, and all by 2050. This is unrealistic and unaffordable, as 48% of NYS residents are of low to moderate income. The electricity specified would come mostly from "Intermittent Renewables" (page 10), after "Retirement of Fossil Fuel Fired Facilities"(pg 154-158), "Accelerate(d) Growth of Large Scale Renewable Generation"(pg 158-161), and "Support (for) Clean Energy Siting and Community Acceptance"(pg 162-164). To date, these large scale, industrial projects are being built in rural areas, often hundreds of miles from the places with the pollution problems, health impacts, and high energy usage that this plan seeks to remedy. However, these installations, and the long distance transmission upgrades they demand, are sacrificing forests and farmland, reducing the only viable method of carbon sequestration and removing these resources from local use- both unwise and unfair to surrounding communities. Does concern for "environmental justice" only apply to "disadvantaged communities" in downstate, urban areas?

To protect natural areas, increase carbon sequestration, and provide real "environmental justice" for all New York, I strongly support the strategies listed in Chapter 15, "Agriculture and Forestry", and most of those in Chapter 19, "Land Use" designated as LU 1-7 (pg 274-275), especially LU-3, "Avoid Agricultural and Forested Land Conversion". I strongly oppose the strategies at E-2, "Accelerate Growth of Large Scale Renewables", as well as additional funding, staffing, and regulatory powers for the New York State Energy Research and Development Agency and the Office of Renewable Energy Siting, as their policies, procedures and regulations have been destructive of communities, natural areas, and the principle of 'Home Rule", as embedded in the New York State Constitution.

Sincerely,

Lewis J. Derty