

NEW YORK STATE CLIMATE ACTION COUNCIL  
Draft Scoping Plan Comments  
NYSERDA  
17 Columbia Circle  
Albany, NY 12203-6399

Dear Council Members,

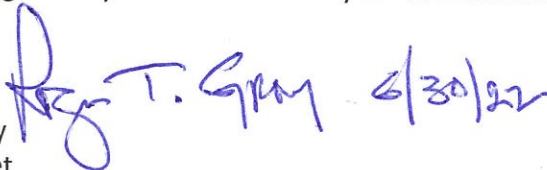
Thank you for all the work and deep investigation you have conducted to prepare the Draft Scoping Plan document. I support the climate goals outlined in the document and much of the approach you propose to achieve the goals.

My comments on specific sections of the Scoping plan follow, below.

Thanks you again for your hard work and your commitment to protecting our global environment.

Sincerely,

Roger T. Gray  
224 Jay Street  
Albany, NY

Handwritten signature of Roger T. Gray in blue ink, dated 6/30/22.

Comments:

#### 5.1 New York's Climate Vision (p.27)

The NYS Climate Action Council Draft Scoping Plan is a comprehensive analysis of what NYS can do within its borders to mitigate, and help reverse, the impacts of CO2 on global warming. However, of course, global warming is a global problem. Section 5.1 notes that "State government action alone will not be enough."

To emphasize that this is a global problem which all nations must work cooperatively to address, the Scoping Document should include a section addressing the global nature of the problem. For example, the Scoping Plan should propose that New York State establish relations with a "sister state" in South America (similar to the "Sister City" concept) to jointly promote forest carbon sequestration, and international wildlife connectivity.

Similarly, the Scoping Plan should more strongly emphasize the need for development of wildlife corridors, for example the Algonquin to Adirondacks corridor, working cooperatively with Canada, and the Splitrock Wildway, and Saranac To Mississquoi, corridors, working cooperatively with Vermont, as a means of mitigating the impact of climate change on wildlife, and highlighting the need for species migration as an adaptation strategy to the warming climate.

#### 7.5 Power Plant Retirement and Site Reuse (p.49)

This section should emphasize that no power plant should be reused, wholly or in part, for energy-intensive crypto-currency mining.

## 11. Transportation (p.94)

Surprisingly, this section only provides a brief nod to improving rail service as a means of improving mass transit / public transportation (p.107). There should be a much more extensive analysis of the means and benefits of improving rail service in the State, as a means of reducing the overall carbon footprint of transportation. (Trains are the ultimate driverless cars!). The attendees at COP26 made a big show of arriving in Glasgow by train, emphasizing that a passenger's carbon footprint is approximately 7 times less for travel by train vs traveling the same distance by airplane. Comparisons for transporting freight by diesel truck vs by train would also show significant reductions in carbon footprint. New York has a large network of unused former railbeds. The Scoping Plan should emphasize the environmental benefits of rail travel.

Also there should be a thorough discussion of the life cycle impacts, and complete carbon footprint, of electric vehicles, compared with fossil fuel vehicles. Mitigating climate change must be a global effort; New York should not be in the position of adversely impacting the environment of foreign regions where the components (eg lithium, cobalt) for our electric vehicle batteries originate.

## 13. Electricity (P.149):

### -- Parking Lot Solar Panel Canopies (p.161)

This section should be expanded to discuss the benefits of locating solar panels in commercial parking lots (solar panel parking canopies) and on commercial rooftops for the purpose of diverting large solar panel arrays away from green space where they create a "heat-island" effect, and where there otherwise exists a heat-mitigating effect from the trees, plants, and grasses. If the over-arching goal is to reduce global warming, it makes no sense to heat up our green spaces, which have a natural heat-reducing benefit.

It is counterproductive to place large solar arrays in green space, such as unused farmland, before requiring that all commercial parking lots have solar panel canopies. Green space is a natural climate cooler, while solar panels create "heat islands." If we are to meet the 30x30 goals, we should work to keep open space open, and keep forests forests, as the Plan proposes.

## 15. Agriculture and Forestry (p.193)

### --Increase Prevention of Invasive Species / Combat Invasive Species (p.201)

The Plan should emphasize the need to support providing DEC with additional staff and funding to address the impact of invasive species on forest health, to protect forest cover, to preserve the carbon sequestration benefits of our forests, and to similarly protect our aquatic ecosystems from the adverse effects of invasive species.

## 19. Land Use (p.272)

The Adirondack Park, unfortunately received scant mention on the Draft Scoping plan, yet it is a world-renowned conservation success, thanks to the NYS Constitution, Article 14 (the 'Forever Wild' clause), and to the formation of the Adirondack Park Agency (APA). There should be more examination about how the successes of the Adirondack Forest Preserve as a 'carbon bank' can be applied in other areas of the State.

Given the tremendous significance of the Adirondack Forest Preserve in terms of carbon sequestration and global warming mitigation, the Draft Scoping Plan should recommend that the APA suspend all permitting of large-scale development proposals until the Scoping Plan has received full approval. It is worth noting that DEC denied permitting of the Greenidge Power Plant because, if approved, the plant would adversely impact the ability of the State to meet its climate goals under the Climate Leadership and Community Protection Act. A similar case can be made for denying permits for large-scale developments in the Adirondack Park.

## 21. Adaptation and Resilience (p.308) & Appendix II:

### AR10. Threatened Ecosystems and Biodiversity (p.318)

-- 'Expand Conservation Easements to Include Other Areas,' (p.319 & H-19) should be expanded to include a much more thorough discussion of the critical importance of using conservation easements to create wildlife corridors on an ecosystem scale, and the significance of creating these wildlife corridors to permit wildlife migration as an adaptation to climate change; for example, the Adirondacks To Algonquin corridor to the northwest, or the Splitrock Wildway and Saranac To Mississquoi corridors to the northeast.

-- 'Prioritize Biodiversity and Carbon Sequestration,' (p.319 & H-20) advocates that DEC prioritize biodiversity and enhancement of carbon sequestration in the development of Unit Management Plans. This section should be expanded to include advocating that the Adirondack Park Agency incorporate the same priorities when considering permit applications for large scale developments..