



TOWN of LANSING

"Home of Industry, Agriculture and Scenic Beauty"

ZONING, PLANNING AND CODE ENFORCEMENT

Lansing, NY 14882

June 10, 2022

Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Dear Climate Action Council:

The Town of Lansing respectfully submits the following comments, prepared by the Town's Conservation Advisory Council and Lansing Advisory Committee on Power Plant Future, relative to the Climate Action Council Draft Scoping Plan:

1. Recommend streamlined funding paths for implementation.

Please consider dedicated funding paths – through the Consolidated Funding Application or other platform – to implement the Plan's recommendations, many of which require interagency cooperation. Additionally, consider a Program Opportunity or the like to provide municipalities – particularly those with few staff Planners – the expertise and funding mechanisms to implement.

2. Streamline the plan's length.

The Town appreciates the breadth of the document, the emphasis on stakeholder input, and how that climate justice is integrated into the plan. It's well-organized, and, for its size, easy to index. An actual executive summary, capturing the key points of each part of the plan—with recommendations—would be a great service to readers.

3. Increase usability of the plan.

Another service would be to hyperlink the acronyms to their "complete names" each time (or at least the first and second times) they are used in a section. The plan has a LOT OF ACRONYMS. The list at the beginning of the document is a helpful start, but unlinked to the rest of the plan. Alternatively, spell each one out at the beginning of a section.

4. Consider feasibility of renewables to meet demand.

The draft Scoping Plan does not adequately address electricity shortfall, nor does it propose enough solutions to bridge the gap. This is especially the case since energy use is projected to grow considerably with electrification required by the CLCPA. If the plan's answer lies in proposed battery storage, we are concerned that storage is designed for *days* of storage, not *months* of storage. If the answer lies in offshore wind, that wind can be inconsistent. Furthermore, land-based (onshore) wind seems to be omitted from the 2030 survival scenario (9 GW of offshore wind; 6 GW of solar; 3 GW of storage). We recommend incorporating the issue of reliability by referencing NYISO's summary of its reliability study under the CLCPA at <https://www.nyiso.com/documents/20142/16884550/Climate-Study-Factsheet.pdf/a81dd275-6640-66ec-f6aa-5d403aa44130>. The NYISO study highlights the serious challenge of meeting rising electrical demand with drastically increasing energy sources that are weather-dependent, i.e. not *on-demand* or baseload sources.

5. Include more robust information on the prioritization of electrons for different commercial and industrial uses.

Blockchain technology – also known as distributed ledger technology (DLT) – is likely to impact demand response and a host of other utility operations. Proof-of-Work blockchain technology may end up as the energy sector standard. But the Scoping Plan contains minimal information on this technology and mentions cryptocurrency mining in only *one paragraph*. The immense amount of electricity required by proof-of-work technology (cryptocurrency mining and exponentially increasing computational requirements) could make it impossible for NYS to reduce GHG emissions. Given that NYS is *already* experiencing conversion of fossil fuel power plants to proof-of-work mining facilities (which goes against the recommendations in Section 7.5 to shut down fossil fuel power plants), consider including a comparison of energy use for different types of cryptocurrency mining and more specificity in Chapter 13: Electricity.

6. Consider the feasibility of green hydrogen.

New York currently lacks the technology to make hydrogen without large amounts of electricity, which NYS won't have (especially during future winters when peak demand occurs and if we're depending on solar electric production). Hydrogen's viability seems too far off to be useful within the timeline. Second, transport is currently a safety issue, and transport and storage pose logistics problems. Additionally, the Scoping Plan assumes that about half of New York State's green hydrogen will be imported. We are concerned about whether this assumption is realistic, as in times of high demand and low supply, energy imports to the state tend to decrease.

7. Consider flat-plate solar collectors.

Chapter 12: Buildings puts a tremendous amount of stock in electrification, but solar flat-plate collectors aren't mentioned for heating and pre-heating domestic hot water. Collectors have no moving parts, produce heat even on a cloudy day, and significantly reduce use of carbon fuels.

8. Include more options in E10 (Explore Technology Solutions).

Direct geothermal, tapping into the earth's heat lying 10,000 feet below the surface, is an emerging technology that is being piloted at Cornell University. If successful and economically viable, it could meet future needs for 130-degree hot-water heating of buildings in NYS. Consider including in this section or elsewhere the technology needed to repurpose materials after the decommissioning of renewable infrastructure when the life of a renewable project is over, and details about how such decommissioning should be accomplished. Is methane capture from individual residential wastewater systems worth mentioning?

9. Consider advanced and small-scale nuclear energy as low-carbon-emission energy

The Scoping Plan largely ignores the potential contribution of nuclear energy and does not analyze whether adding nuclear energy to the mix can decrease overall energy system costs. This analysis should be performed under different scenarios of future nuclear power capital costs and/or should borrow from similar completed studies. Several prominent studies such as those by the [National Renewable Energy Laboratory](#), [Clack et al.](#), [Denholm et al.](#), and the [MIT Interdisciplinary Study on the Future of Nuclear Power](#) show that overall energy costs are lower and reliability is improved with the inclusion of nuclear power in zero carbon future scenarios.

10. Local municipalities need help with land conservation.

We applaud the section in Land Use that states: "Deciding where to conserve land, where to develop and how to arrange and design that development constitutes the critical first steps in addressing climate change in land use.... State policies, programs and incentives can influence and inform those local decisions to achieve more sustainable, climate-friendly land use outcomes.... Establish programs to support local land acquisition: DEC should considerably enhance support for local land acquisition and conservation easements by municipalities and land trusts through mechanisms such as the Community Preservation Act, Conservation Partnership Program (CPP), Forest Conservation Easements for Land Trusts and Community Forest programs."

The DEC will need *a lot more funding* to enable local governments to identify parcels and protect them. We propose that the Scoping Plan recommend mechanisms both for this increase *and also* designate grant funding for local land trusts.

The plan should recommend additional grants for municipalities with conservation advisory councils and conservation boards that have completed an open space index and identified lands in need of conservation for climate mitigation purposes. The document should expand its slim references to the damaging effects of erosion and show how protecting land from erosion (and deer browse) can help offset the effects of climate change. Describe how funding must increase for Soil and Water Conservation Districts. The plan could also specify that when reforesting lands, communities should avoid monocultures and ensure species diversity. We do not know why the plan does not mention or suggest partnering with NYFOA, the NY Forest Owners' Association, nor does it mention training Master Foresters in sustainable methods. We applaud the

short-term Payment for Ecosystem Services for farmers and landowners as described on page 232.

11. Educate the current generation.

Consider adding to the plan how NYS will support more high school, community college, and certificate training programs so that NYS can gain the expertise both to build the renewable infrastructure we need and to help communities become more resilient.

12. Consider a carbon fee.

We concur with the Scoping Plan’s many assertions that carbon pricing would accelerate the transition from fossil fuels. Carbon pricing that includes a cash-back dividend could act as a tool to reaching the state’s climate goals. The IPCC states that a significant carbon price may be the single most effective tool for the transition from fossil fuels to clean energy sources.

13. Encourage climate-resilient agriculture.

Conventional agriculture relies on fossil fuels to produce the fertilizers and pesticides on which it depends. For NYS to reduce GHGs, protect water resources, and enhance soils, this Scoping Plan needs to mandate incentives for adoption of climate-smart farming practices. Those currently promoted by the NYS Dept of Ag & Markets (NYS DAM) include the Climate Resilient Farming Program (<https://agriculture.ny.gov/soil-and-water/climate-resilient-farming>), and the Agricultural Environmental Management (AEM) Program (<https://agriculture.ny.gov/soil-and-water/agricultural-environmental-management>), which focuses on improved soil health, using rotation and fall/winter cover crops, IPM, and nutrient management planning to minimize chemical inputs. Expanding funding and implementation of these programs could have significant impact on meeting state climate goals. Addressing organic agriculture in a serious manner and including ways to enhance it statewide could further yield climate benefits.

Sincerely,



C.J. Randall
Director of Planning
Town of Lansing, New York