

**DELAWARE COUNTY  
DEPARTMENT OF PUBLIC WORKS  
PO BOX 311 DELHI, NY 13753**

**SUSAN MCINTYRE  
COMMISSIONER**

**MAIN OFFICE & YARD  
PAGE AVENUE  
DELHI, NY 13753**

1 July 2022

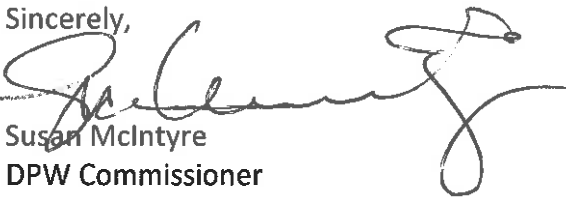
Draft Scoping Plan Comments  
NYSERDA  
17 Columbia Circle  
Albany, NY 12203-6399

Re: Comments - Climate Action Council – Draft Scoping Plan

Dear NYSERDA:

Please accept the following comments on the Draft Scoping Plan compiled by the Climate Action Council. These comments are intended to facilitate success and mitigate against unintended consequences of implementation of the Climate Leadership and Community Protection Act. Comments herein are discrete and targeted, addressing the transportation sector, and from the operational perspective of a municipality with a proactive management tradition. I urge your sincere consideration of these recommendations.

Sincerely,



Susan McIntyre  
DPW Commissioner

DPW Comments CLCPA DSP 1july2022.docx

*Main Office: 607-832-5800 Fax 607-746-7212 Delhi Shop: 607-832-5840 Fax 607-832-6072  
Solid Waste Management Center: 607-865-5805 Fax 607-865-2216*

**COMMENTS ON DRAFT SCOPING PLAN  
DELAWARE COUNTY DEPARTMENT OF PUBLIC WORKS  
SUSAN MCINTYRE, COMMISSIONER  
1 JULY 2022**

**CONCERN 1: ZEVs and especially ZE trucks and buses are heavier than their conventional counterparts. This will accelerate the rate of deterioration of road and bridge infrastructure associated with physical deterioration from increased weight impacts.**

**RECOMMENDATION 1:** Continue to provide funding for repair and maintenance of highway and bridge infrastructure. A readily deployable and cost-effective mechanism for this recommendation is expansion of the existing NYS CHIPS funding-stream. We recommend providing additional overall program funds for statewide municipal level distribution and increasing the required bidding threshold from \$250,000 to \$750,000 within the CHIPS program rules. This recommendation strengthens existing funding mechanisms and utilizes existing municipal highway crews and contractual agreements for rapid deployment of infrastructure repair in a manner consistent with supporting community level economic viability, employment both public and private, with minimal disruption and delay associated with new program development.

**CONCERN 2: Increased access to charging stations is identified as necessary to provide transportation reliability. This will necessitate utility/electric line extension to currently under-served locations and will exacerbate the frequency and significance of physical conflicts between highway maintenance activities and utility lines.**

**RECOMMENDATION 2:** Highway and bridge repairs and replacements often require relocation of existing utility/electric lines to accommodate engineering design standards and oversize construction equipment such as excavators and cranes. Current standards require utilities to relocate lines when required for highway infrastructure repair and construction. Competing priorities of uninterrupted utility service and transportation will exacerbate with increased quantity and significance of utility service associated with expansion of electrification goals. Minimize conflicts between utility lines and highway infrastructure by removing environmental easement restrictions for utility lines crossing conservation and/or environmental easement lands and by encouraging utility location away from roads and bridges.

**CONCERN 3: Mobility Oriented Development will increase the volume of pedestrians and cyclists. Co-locating pedestrians and bicyclists adjacent to cars and trucks will result in greater opportunity for danger to non-vehicular travelers.**

**RECOMMENDATION 3:** Increased risk of personal injury to travelers, both in frequency and significance, is due to both increased participant volume and to electric vehicles being quieter than conventional vehicles, providing less auditory warning of their approach. Achieve higher safety and long-term success by establishing walking/biking routes and pathways that are physically independent of existing roads and highways rather than co-location.