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**New York State Energy Research and Development Authority (NYSERDA)  
Climate Action Council**

Re: Using New York's roads for renewable energy generation and transmission (Climate Action Council Draft Scoping Plan, Chapter 13: Electricity)

Thank you for inviting public comments on the Draft Scoping Plan. I am frustrated by the slow pace of construction of renewable energy in New York State, and I know that local opposition to renewable energy development is part of the problem.

I am a landscape architect, and it is my job to find creative solutions to problems of competition for outdoor space. I have noticed that the scoping plan overlooks an incredible opportunity to add renewable energy generation and transmission to the state, without using farmland or private property: using our public highways. We can and must use them for renewable energy generation and transmission.

The New York State Thruway alone represents hundreds of square miles of public land that could be used for generation of public renewable energy. Every grassy surface with appropriate exposure should be used for solar fields mounted on the ground - whether that's along the medians, the adjacent empty spaces, or within the interchanges. Every paved surface where cars park within the service areas should have elevated solar panels; doing so will provide shade and weather protection for drivers visiting rest areas. We must also mount solar panels on every constructed space with appropriate exposure, like sound barriers, the roofs of service areas, and toll plazas. Wherever possible we should avoid cutting down trees to make way for renewable energy (and we should never use trees for biomass energy generation), though the medians of our state highways could be an exception to this if we could install solar generation there at a faster rate than we could on private lands. Transmission lines should be located within the right-of-way as well - either elevated or buried.

By siting solar panels along the interstate highways, we can demonstrate New York's leadership and commitment to renewable energy; every out of state driver will see that we are leading. Massachusetts already does this, and goes a step further by showing the real-time generating capacity on an online dashboard for the solar fields along the MassDOT interchanges:

<https://dashboard-portal.solarpark-online.com//index.php?uid=91cPFG7R>

While constructing these solar fields and the necessary transmission infrastructure, we can demonstrate our commitment to creating jobs that cannot be outsourced.

Nearly a third of New York's greenhouse gas emissions come from transportation. To electrify transportation we will need many more electric vehicle charging stations, and it makes sense to locate many of those stations along major highways where drivers need them. It would be even better if those

stations could be sited near transmission lines and renewable energy generation. Using the public highway system for renewable energy generation and transmission would reduce transmission losses of the electricity needed for transportation. Our State and Federal Government spent immense amounts of time, energy, and material on creating our public highway system. Now lets make that system truly work for the people, even those who do not drive - by using it for renewable energy.

Our public highways are not the only opportunity for renewable energy generation. We can use other forms of "waste space," such as the roofs of warehouse buildings, and brownfields. We should incentivize or require flat roof buildings above a certain size to lease space to renewable energy developers. We can make Amazon pay its fair share - if not in taxes, then in space for renewable energy.

Thank you for your consideration.

Sincerely,  
Delia Kulukundis