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NYSERDA
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Attention:

NYS Climate Action Council Co-Chairs
Honorable Doreen Harris, President & CEO, NYSERDA
Honorable Basil Seggos, Commissioner, NYS DEC

Dear Honorable NYS Climate Action Council Co-Chairs Harris and Seggos,

I am writing to express support for the Climate Action Council Draft Scoping Plan (the "Plan") dated December 30, 2021. The strategies in the Plan outline detailed and aggressive pathways for the State to meet the Climate Act's GHG emission reduction goals. I applaud the work of the Climate Action Council in developing a viable plan for achieving the State's bold clean energy and climate agenda.

In parallel to the Climate Action Council's development of the Plan, Ulster County released and is currently implementing its Green New Deal Plan. This plan targets three main goals to:

- **Accelerate the transition to clean energy**, so that by 2040 we've achieved transformation of our electricity supply, buildings, and transportation systems
- **Build the equitable green economy** by connecting all our residents to economic opportunity and creating the educations and business development foundations to place Ulster County at the leading edge of the new industries this transformation will spawn
- **Conserve natural resources and build resilience** to the impacts of our changing climate, guiding our development with sound conservation priorities, and ensuring that all our residents enjoy the bounty of our natural resources

The County's Green New Deal Plan utilizes the powers of the executive branch of County-government to implement change at both the government operations level and across the broader community of Ulster County. As the need for climate action at the community-scale has become increasingly urgent, the County, through the Green New Deal Plan, has prioritized community focused projects such as a community climate action planning effort, a housing action plan, and a climate vulnerability assessment.

However, our experience implementing the Green New Deal, and our review of the Plan, has highlighted the following needs:

State-supported staffing at the County-level: Since 2007, Ulster County has funded a dedicated department, the Department of the Environment, to coordinate environmental policy, resource planning

and projects across its interrelated County departments. Through this model, the County has built a wealth of organizational capacity and technical expertise—to implement our Green New Deal plan, to complete work in the State’s Clean Energy Communities and Climate Smart Communities programs, and to prepare for the immense work ahead of us in implementing the NYS Climate Act.

At the County-level, we have identified numerous opportunities to support our 24 local municipalities—one city, 20 towns, and three villages—in Climate Act work, but have limited capacity to implement these opportunities. These opportunities might take the form of shared IT hosting capacity, coalition building activity, technical support, or shared services agreements. The existing regional networks of Climate Smart Communities and Clean Energy Communities coordinators do fill some of these roles to an extent, but cannot provide the local knowledge, nor the access to County-level resources, that a dedicated County-level department can offer. The County-level of government is uniquely positioned to successfully implement many of the sector strategies contained in the Plan.

Therefore, in addition to the other methods discussed in strategy *LG5. State Support and Guidance*, the State should provide direct funding to Counties to hire, and train dedicated staffing to build and maintain local capacity for implementation of the Climate Act.

State-level regulations for energy efficiency and clean energy: The current approach of relying on local municipal action for the adoption of model laws and codes will continue to fall short of achieving the energy efficiency, zero emissions, and resiliency goals of the Climate Act.

Wherever possible and warranted, the State should implement regulations to ensure the timely and efficient adoption of the strategies contained in the Plan including codes and standards for new construction and for existing buildings and equipment and building energy use reporting.

Electricity cost relief for low- and moderate-income households: The electrification of the buildings and transportation sectors will likely lead to increased electricity rates due to the necessary investment in the electricity generation, transmission, and distribution systems State-wide.

The current rate structure provides little relief for low- and moderate-income families that will be disproportionately impacted by increased energy costs, resulting in a disincentive for personal investments in electric heating/cooling equipment and vehicles. The State should provide a clear, long-term signal and commitment to provide electricity cost relief to ensure households can budget for the necessary capital improvements to meet Climate Act mandates.

Regular updates to the Disadvantaged Communities designation: The focus on directing State programs, projects, and investments to Disadvantaged Communities is essential in ensuring a just and equitable transition in conjunction with the achievement of Climate Act goals. However, it will be important to consider that the criteria used to identify Disadvantaged Communities may not necessarily be granular enough or updated frequently enough to accurately identify and reflect all vulnerable communities. Also, the specific indicators of vulnerability and disadvantage may vary widely across Disadvantaged Communities.

It will be important to both continuously refine and update the criteria and the designations of Disadvantaged Communities, as well as consider if the resources being directed to these communities are successfully addressing the identified vulnerabilities.

Special considerations for rural areas: The plan should recognize that rural areas may not receive designation as a Disadvantaged Community, yet low- and moderate-income rural households are likely to suffer disparate impacts from implementation of the Plan such as:

- transit system improvements and transit-oriented development are likely to be more effective and accessible in urban & suburban areas
- electrification of larger and older homes is more difficult and costly
- the contractor skill sets needed for electrification and energy efficiency improvements will be less available and competitive
- the agricultural sector will be impacted both as typically a large energy user and by a higher rate of solar and wind siting on agricultural lands

The Plan should be responsive to the unique challenges and threats facing rural areas. While the Plan recognizes some of these unique issues, it provides little in the way of response. The final Plan should mandate the creation of a special group to develop and implement needed policies and programs to assist rural areas.

Thank you for the opportunity to review and comment on the Draft Scoping Plan; Ulster County looks forward to working closely as a partner with NY State and its Agencies to implement the strategies and recommendations that will help us achieve our common goal of transitioning to a clean, equitable, and resilient future.

Sincerely,



Patrick K. Ryan

Ulster County Executive