



June 30, 2022

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

scopingplan@nyserda.ny.gov

Dear President/CEO Harris and Commissioner Seggos:

The combined membership of the Bus Association of New York is responsible for ensuring the safe transportation of millions of New Yorkers annually, as well as bringing millions of tourists to the State. Founded in 1938, BANY represents the broader interests of private motorcoach companies and their vendors, as well as travel and tourism entities. A significant portion of our membership is made up of small and often family-owned businesses. We get families to work and to school; we get tourists to New York's scenic treasures; we get our fighting men and women to their deployments around the United States.

Simply put, we move New Yorkers to where they need to be. But that will be made significantly more difficult and expensive if the Climate Action Council's Draft Scoping Plan is approved as written.

While nearly every public transit system requires significant government support for infrastructure and operations most of our members receive no public assistance. Transitioning to zero-emission vehicles will require additional funding to cover the incremental costs of purchasing zero emission buses above current diesel or gasoline powered buses, the cost of vehicle charging infrastructure, access to sufficient electric power for charging equipment, and retrofitting bus maintenance and storage facilities to accommodate electric vehicles.

Our members, will need to change over their fleets to accommodate the zero-emission mandates contained within the Plan. Mandates that will inevitably drive many of our smaller members out of business. It would also potentially allow a few larger bus companies to consolidate their control over the market, eliminating competition and potentially disadvantaging New Yorkers who could lose access to public efficient transportation. Any mandates should also have corresponding subsidies and financial incentives to help balance the costs for private entities.

As far as we can determine, the Draft Scoping Plan does not adequately factor in the charging station needs of our industry. We believe the current and near-future EV infrastructure is insufficiently built out.

In addition, our current fleets, should be allowed to remain utilized in New York for their useful life. A motorcoach is a substantial investment so we urge grandfathering clauses be included in any future legislative mandates.

It is also important to note that our industry is a cost effective transportation alternative and a leader in environmental stewardship. According to a study by M.J. Bradley and Associates, on average, motorcoaches use the least amount of energy and produce the lowest carbon dioxide emissions per passenger mile of any of the transportation modes

Bus Association of New York, Inc.

Albany, New York 12210

analyzed. A January 2021 study from the Chaddick Institute for Metropolitan Development at DePaul University clearly showed the importance of intercity bus service in providing affordable transportation options to those with limited economic resources (as well as the value it provides to other types of travelers).

Finally, as you may or may not know, our member companies are a critical part of FEMA and state emergency response efforts. Yet, we have no way of knowing – but considerable reason to doubt – if this new, untested fleet of EV busses can withstand the extreme weather events that hit many regions of our state every year.

The Draft Scoping Plan is too rushed and contains too many holes. It is unworkable and detrimental to the state's motorcoach industry. We urge you to delay the timeline to allow a more thorough review of its financial impacts on private businesses.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Brisman", with a stylized flourish at the end.

Robert Brisman
BANY President
West Point Tours