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June 30, 2022

Draft Scoping Plan Comments
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SIMON SKOLNIK COMMENTS REGARDING CHAPTER 21 - ADAPTATION AND RESILIENCE

The review of the CAC for this chapter primarily involves state actions that affect local communities. Local communities require the following: (1) Educational outreach, which includes resource directories for specific topics; (2) Financial Assistance for programming, planning, and implementation of resilient strategies; (3) establishment of networks to tackle problems and initiatives that are common to regions. The takeaway from this report are what needs to be added to the CAC, whether the topics were neglected or not fully developed.

Additive and/or more fully developed Issues for Chapter 21. Adaptation and Resilience

1. Communities and Infrastructure: AR7. Develop Policies, Programs, and Decision Support Tools to Reduce Risks Associated with Coastal and Inland Flooding; and Living Systems: AR12. Preserve and Protect the Ability of Forest Ecosystems to Sequester Carbon.
 - A. *Background*
 - (1) The science of carbon sequestration regarding wetlands is still evolving. For example: PLOS ONE in a study published in March 25, 2021 Productive wetlands restored for carbon sequestration quickly became net CO2 sinks with site-level factors driving uptake variability stated in its abstract: "Established wetlands had a high carbon sequestration efficiency (i.e., the ratio of net to gross ecosystem productivity) comparable to upland ecosystems but varied between years undergoing boom-bust growth cycles and C uptake strength was susceptible to disturbance events." Some other studies state that wetlands, acre for acre, are the highest depository of long-term storage of CO2, greatly exceeding forests and woodlands.
 - (2) In addition, wetlands are proven temporary storage for flood waters, providing waters that could inundate developed land a holding place for slow percolation into the ground.
 - (3) The CAC states: "Flooding is New York's primary climate hazard. While this is true, it is better restated as follows: Coastal Flooding is New York's primary

unavoidable climate hazard, and inland flooding is New York's primary avoidable climate hazard."

B. Actions:

- (1) The CAC should add a chapter on wetlands and how their maintenance and restoration are critical to both carbon sequestration and flood control. Wetlands, as well as re-sized storm infrastructure and green infrastructure, are the best ways to avoid inland flooding.
- (2) The NYS DEC should consider lowering the threshold of state regulated wetlands from 12.4 acres (5 hectares) in order to have control over more local wetlands where those communities have not created municipal ordinances protecting their wetlands
- (3) Provide localities with the best and most current science involving wetlands as carbon sequesters.
- (4) Presently, NYS DEC governs the use of aquacides in open bodies of water. In many cases, they rubber stamp the application. NYS should consider revising existing laws and either lower the regulating body to a county or even a municipal level, where local stakeholders can participate in any approvals. Poisoning of our waters, whether they are used for drinking, fishing, fire control or recreation must not be the first choice of treatment. Open bodies of water, either in public or private hands, should have a management plan established to determine the best ways to keep them potable.

2. Building Capacity: AR1. Commit to Creating, Implementing, and Updating Comprehensive and Equitable State Climate Change Adaptation and Resilience Plan

A. Background

- (1) Table 17. Average Annual Property Loss from Severe Hazard Events in New York, 1996 - 2017 lists as the last hazard: "wildfire" with an amount of \$4,640. (Note the common term for "wildfire" in NYS is "brush fire". They mean the same.
- (2) Westchester Journal News, May 12, 2022 in an article entitled 'A perfect storm' percolating for brush fires in the Hudson Valley region, officials say reported on a brush fire in Rockland County that required additional responses from departments in Orange County and into New Jersey. They also reported on brush fires in recent weeks in Dutchess and Westchester. The reason for these outbreaks was stated: "Spring conditions that are drier than usual, windy conditions further drying out grasses and leaves and spreading any flames that spark, are feeding a dangerous situation, say weather experts and emergency service officials." Add to that the "increased enthusiasm for hiking nature" provided by Covid restrictions led the Thiells Fire Chief Daniel Coughlin to say "This spring's been a 'perfect storm' for brush fires in the Hudson Valley region. Coughlin further lamented: "It's really challenging. We're all volunteer"
- (3) NYS has been fortunate that it hasn't in the recent past been subject to the devastating wildfires found in the west. But the cause for the current outbreak of brush fires reported this past spring in the Hudson Valley (and there is every reason to suspect this to be a statewide issue) , attributed to higher winds and drier weather, are symptomatic of weather changes brought on by climate change. Drought and high wind storms, which are common in the American

west, are now showing up here in Hudson Valley, and by inference, the entire state, and we can expect them to become worse.

B. Actions

- (1) NYS must lead the effort in educating local community fire districts on how to prevent and combat brush fires.
- (2) NYS must lead the effort to provide education to land owners to use BMP that will prevent the start and the rapid spread of brush fires.
- (3) NYS must create a network throughout the state that brings together volunteer fire departments that have the correct equipment to fight brush fires. This may mean the establishment of a state command center to deal with future brush fires.
- (4) NYS must provide grants for local volunteer fire departments to purchase the correct equipment to fight brush fires.
- (5) NYS must consider the possibility of creating a professional fire-fighting state force that has the training and the equipment to assist local volunteer fire departments in preventing and quickly containing brush fires.

3. Communities and Infrastructure: AR5. Provide State Agency Planning and Technical Support for Equitable Regional and Local Adaptation and Resilience Plans and Projects.

A. Background

- (1) The CAC states that “Enhancing resilience of communities and infrastructure includes strategies to assist municipalities to prepare for and react to increasingly severe climate hazards. The strategies include recommendations to expand State support for regional and local planning, assist municipalities in their efforts to incorporate future conditions into local planning and regulatory decisions, recommendations to address risks due to flooding and extreme heat, and recommendations to ensure resilience of the energy system.”
- (2) The CAC states that the highest-priority actions are to appoint a chief State resilience officer (CSRO); convene an adaptation and resilience sub-cabinet; develop comprehensive State climate change adaptation and resilience plan, based on a common vision of resilience; develop a policy on evaluation of equity and justice impacts of State adaptation and resilience decisions and of existing impacts of displacement and harm, and provide guidance on use of such evaluation to prioritize action in Disadvantaged Communities; establish a campaign to build student and public awareness of climate change effects and solutions; and create a resilient infrastructure fund through bonding.

B. Actions

- (1) NYS should utilize statewide associations of local environmental groups. Bedford 2030 is a member of the New York State Association of Conservation Commissions (NYSACC), which represent over 270 municipally appointed conservation advisory commissions (CACs), sustainability committees, county environmental management councils (EMCs), climate smart task forces, and coastal management councils. NYSACC is funded strictly by member dues, as compared to another statewide association, the Urban Forestry Council, which is state funded. Funding by the state for CACs and EMCs existed until the late

1990's when statewide LEAP funding was discontinued. If the state is looking to disseminate their programs on a local level NYSACC should be funded.

(2) While the state argues that its highest-priority is to appoint a CSRO, that doesn't help local communities enact climate resilient policies and programs. NYS should create grants to enable municipalities to create their own Department of Climate Resiliency to partner with the state on climate change programs. In addition, in order to work on a larger scale, the state should also be funding county level organizations, that could be based on either already existing EMCs or new EMCs established in the county. The importance of local resilience offices, both on a municipal and county level is essential for any of the state's policies to succeed.

(3) Living Systems: AR11. Enhance Climate Resilience and Adaptive Capacity of the Agricultural Sector, while preparing to Take Advantage of Emerging Opportunities

A. *Background*

(1) The CAC addresses only actions that impact professional farming. As we have found out during the Covid pandemic, it is very easy for the supply chain, that in the past provided food from regional, national and international sources, to break down. This has occurred particularly in stressed populations, such as low income and areas of color. What is needed is a means of relocating food sources that require long distance transportation to ones close to their consumers' locations.

(2) NYS has been talked about as becoming part of a new bread basket source of food production due to the vagaries of climate change.

B. *Actions*

(1) The closer the source of food to its users makes that food more secure to use. Therefore, NYS should subsidize farmers in order to have them be able to financially afford to own, lease or rent in areas not presently open to them due to high land values. Public land, including state, county, federal, and municipal owners, should be examined to see if they would be suitable for farmers.

(2) NYS must establish a division within its Department of Agriculture and Markets for small public/private amateur food producers, such as residential "Victory Gardens" and community gardens. Community gardens have had a mixed record in the past, where enthusiasm at their initial undertaking is traded for lack of interest in subsequent years. This will change, when community gardens begin to produce essential life-giving nutrition for those who work these spaces. NYS must be able to support these programs, both with education and with funding.

5. Communities and Infrastructure. AR8: Develop Policies and Programs to Reduce Human Risks Associated with New Patterns of Thermal Extremes. AR9: Ensure the Reliability, Resilience, and Safety of the Energy System.

A. *Background*

(1) The CAC states: "In most years, more Americans die from the effects of extreme heat than from flooding and frequency of extreme heat events is one of the most

direct effects of global warming. At the same time, changes in atmospheric circulation patterns, perhaps precipitated by loss of sea ice, may lead to periods of extreme cold in New York. Components to this strategy include support for cooling centers, heat emergency planning, weatherization, and access to thermal resilience programs for vulnerable populations.”

- (2) The CAC states: “Support local renewable systems. NYSERDA, in consultation with DPS, DHSES, and local governments should develop a comprehensive strategy to support development of islandable microgrids and district systems using renewable sources of energy to provide locally generated power, especially in critical facilities during grid emergencies.”

B. Actions

- (1) The conjoining of cooling/heating centers and locally obtained renewable energy will be critical to the survival of much of our population, in particular those from disadvantaged communities. When reviewing a municipality's best infrastructure for short-term housing of its population during heating and cooling emergencies, the obvious first choice universally available would be our schools, as they contain sanitary, cooking and large areas that can be set up for sleeping. Yet, when investigated, most schools do not have air conditioning, let alone generator back-up to power AC. And generators, using fossil fuels, would just be adding more GHG's to the atmosphere. The logical choice would be to upgrade core areas of the school buildings with AC, locate renewable energy sources nearby, and install battery storage systems to power essential equipment when energy (wind-driven or solar) are not available. NYS must develop planning and funding mechanisms to marry these two different uses into a resilient solution.
- (2) Renewable energy is not resilient unless it can power 24/7, and this can only be solved using battery back-up. NYS must become a leader in developing batteries that can be used for various solutions.

Respectfully submitted,



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