



Tompkins County
DEPARTMENT OF PLANNING AND SUSTAINABILITY

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Draft Scoping Plan Comments
NYSERDA
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Dear Climate Action Council:

Thank you for the opportunity to comment on the Climate Action Council Draft Scoping Plan (Plan) dated December 30, 2021. Tompkins County has long been a leader in the State in working to implement solutions to the threat of climate change and has partnered with the State to pilot many innovative programs designed to address many of the topic areas identified in the Plan. It is from that awareness of the opportunities and complexities in implementing solutions to achieve our shared goal that we offer these comments on the Plan.

Overarching Comments

- 1. OVERARCHING: Support for Climate Action and Electrification.** The Tompkins County Department of Planning and Sustainability applauds the efforts of the Climate Action Council (Council), the Climate Justice Working Group, the Advisory Panels, and associated staff that helped develop the draft scoping document. The challenges New York, and the world at large, face in reducing greenhouse gas emissions are huge and ensuring our planet is habitable for future generations will take tremendous effort. At the same time, the Plan also offers an unprecedented opportunity for transformation of our systems and a chance to place an emphasis on equity, justice, and a sustainable economic future.

The recommendations in the Plan represent a marked change to the status quo and they form the basis of what is necessary to meet New York State's nation-leading ambitions. Tompkins County has been preparing climate action plans and greenhouse gas emissions inventories since the late 1990s and has conducted detailed studies, such as the Tompkins County Energy Roadmap, to help inform policy and program development. Our county legislature has also committed to reducing our emissions as quickly as possible and we mirror, and fully support, the emphasis placed by the Council on electrification of the heating and transportation sectors. We understand the difficulties involved in undertaking such a planning effort at the county-level and commend you for undertaking this work for the entire state.

While the comments and suggestions below suggest alterations, considerations, and improvements to the Plan, we also urge the State to act quickly and decisively to reduce emissions as quickly as possible. Again, the challenge we face is daunting, but the opportunities that the Climate Leadership and Community Protection Act enables could be transformative for our state. The Tompkins County Department of Planning and Sustainability looks forward to working with the State on many of these recommendations in the years to come.

- 2. OVERARCHING: Prioritization of Actions Needed.** We believe that the Plan would benefit from prioritization of the actions to identify the most important and impactful strategies to be taken. Tying the actions to a timeline would be helpful, as well. It would help New Yorkers understand the proposed path better if it was clear which will be the priorities for implementation in year 1, which will be prioritized in year 2, etc. There is only so much money and staff time available at the state and local level, so selecting

the most important actions to fund, staff, and implement first is critical to seeing meaningful reductions in emissions.

3. **OVERARCHING: Capacity Currently Not in Place at Local Level to Implement Actions.** We noticed that many of the actions identified in the Plan call on staff at the Regional, County, and local government levels to shoulder much of the work involved in implementation. Many of the solutions are to offer grants and funding to local entities to implement. There also needs to be financial support for local governments to hire staff and expand capacity to be able to pursue these opportunities. Most municipalities simply do not have enough staff to apply for and manage the envisioned grants, much less implement the solutions envisioned. The Plan should recognize these limitations and recommend either the State hire staff to implement these actions, or the State should provide direct funding for Regional Boards, Counties, Cities, Towns and Villages to hire additional staff.
4. **OVERARCHING: Significant Resources Needed.** We wholeheartedly agree with the Plan’s focus on promoting electrification to decarbonize our building sector, and we support the Plan’s timeline for improving energy efficiency in buildings and for phasing-out fossil fuel combustion equipment. We think the Plan needs to assess the resources required to achieve its goals. These goals must be adequately supported with financial assistance, workforce development, consumer education, and further research and development for new technologies to support hard-to-decarbonize buildings. As the Plan states, this topic has significant equity concerns associated with it and low-income households must be adequately supported while protecting disadvantaged populations from displacements and minimizing threats to housing affordability that could result if adequate resources are not provided.
5. **OVERARCHING: Estimate of Scale of Resources Needed:** The Plan should do more to estimate the resources, in terms of money, staffing, and capacity building, it will take to achieve the key strategies identified. An informed guess on the Council’s part would do much to convey the scale of effort implementing the Plan would take. For example, regarding forestland protection, using the figures provided in the Plan, there are 18.6 million acres of forest in New York State and in 2020, 6,005 acres were protected through acquisition by DEC and OPRHP. While admirable, that one-year effort protected 0.03% of forestland. If the goal were to protect just 10% of existing forest land, it would take over 300 years at that 2020 rate of protection so the Plan could estimate the resources needed to adequately implement rapid acceleration of these efforts.
6. **OVERARCHING: Statewide Regulations vs. Individual Municipal Regulation.** The Plan includes recommendations for many new regulations and laws and sometimes calls for models to be developed and shared with municipalities. The approach of releasing model laws and regulations requires that municipal governments take the onus upon themselves to adopt and then implement them. This approach has seen limited effectiveness in the past (e.g., the Unified Solar Permit, model battery energy storage system laws, model solar siting laws). We believe that this is not the most efficient or effective approach when the State is hoping to act quickly. Instead, the State should consider implementing targeted laws and regulations at the Statewide level if they are deemed to be critical to the State’s ability to achieve its climate goals. All the proposed laws, regulations and models recommended in this Plan should be evaluated for their potential to impact greenhouse gas emissions and other community factors. Those that are considered critical and highly impactful should be considered for statewide promulgation. Local government input should be solicited and carefully considered prior to enactment of any state regulations that may impact local land uses.

Omissions from the Plan that Should be Addressed

1. **OMISSION: Manufactured Homes.** Manufactured homes are not subject to typical energy codes and existing manufactured homes are often some of the least energy-efficient buildings. The Plan must address this issue if New York State is going to reach its climate goals. First, all new manufactured homes should be required to be well-insulated and meet U.S. Department of Energy “zero-energy ready”

standards to ensure they are fossil-fuel free, energy efficient, healthy, and resilient homes capable of incorporating solar energy to meet the home's energy demands. Second, the State should create a program specific to existing manufactured homes to provide financial and technical assistance to enhance air sealing and insulation, and to replace combustion equipment with electric equivalents. Third, for existing manufactured homes where these improvements are not feasible, the State should provide assistance to help with replacement of these failing units, including safe disposal and provisions to ensure replacement units are affordable for tenants and homeowners. It is critical that programs and assistance be made available for manufactured homes both on owner-occupied lots as well as in manufactured home parks.

2. **OMISSION: Split Incentive.** Current State programs do not address the “split” incentive for renters/property owners in which capital improvements that yield energy savings result in one party paying for improvements while the other party receives the benefits of reduced utility costs. The Plan is silent on this topic and, unless this is solved, there will continue to be little incentive for property owners to make energy enhancements to buildings for which they do not pay the energy bills.
3. **OMISSION: Methane Leakage.** Since 2014, Tompkins County has accounted for the impact of methane leakage during extraction, transmission, and distribution, as well as methane's much-higher global warming potential in the 20-year time horizon. Quantifying these impacts as part of an emissions inventory has helped us understand the significant role methane plays in climate change and the need to prioritize its elimination. The Plan should recommend that the State pass regulations that will address methane leakage in natural gas infrastructure as expeditiously as possible.
4. **OMISSION: Cryptocurrency.** The Plan contains almost no mention of a critical issue for New York State: how cryptocurrency is viewed in the context of the Climate Act. We are already seeing cryptocurrency emerge as a critical issue for Upstate communities where previous fossil fuel generation sites are being targeted for potential redevelopment for the generation, or “mining,” of cryptocurrency. This issue is further magnified by the extreme amount of electricity these facilities utilize, which in turn exacerbates existing concern with legacy infrastructure and the need for heavy investment in transmission and distribution. The Plan should address the proliferation of cryptocurrency mining and provide a basis for deciding whether any form of cryptocurrency mining is compatible with the State's climate vision. As it stands, the developments that have been suggested could create an incredible burden on our electric grid in the context of electrification and may have major impacts for the development of renewable energy, and, therefore, land use.

Furthermore, many proposed cryptocurrency mining developments claim they will use 100% renewable electricity, presumably via the purchase of renewable energy certificates. If these certificates are purchased from out-of-state renewable energy generators instead of in-state local renewables, it will allow existing or re-powered fossil-fuel generation to continue to power these facilities in New York State while they claim out-of-state renewable generation. This will not help New York meet its renewable energy goals.

If New York State creates an avenue for the development of cryptocurrency mining in-state, then the Plan should recommend the State provide significant technical support for the municipalities where these facilities will be located. The state should consider creating a process similar to that of the Office of Renewable Energy Siting (ORES) or Article 10 that accounts for local community input. These facilities are too large, too complex, require too much electricity, and are too far beyond current SEQRA, zoning, and common land use practices to be left to volunteer municipal boards to govern and authorize without significant support.

5. **OMISSION: Harmful Algal Blooms.** Warmer temperatures and climate change have been shown to lead to an increase in harmful algal blooms (HABs). These blooms can lead to the contamination of waters used for recreation and drinking water supply. Language should be included within the Plan to

address the impact of climate change on the prevalence and frequency of HABs, their danger to public health, and the impacts new policies will have on HABs mitigation.

6. **OMISSION: Wind Energy and Other Renewables.** The Clean Energy Siting recommendations are generally geared towards solar and largely silent regarding wind or hydroelectric energy. We suggest amending the recommendations, where possible, to be renewable technology neutral.

Actions that Should be Emphasized

1. **EMPHASIS: Transmission and Distribution.** For New York State to meet its renewables and emissions goals, a concerted effort is necessary to expand and enhance electricity infrastructure. We support the State's goal to accelerate appropriately sited large-scale renewables and to electrify heating and transportation, however, none of this will be possible unless major investment is made in our electric infrastructure. Furthermore, the existing timelines and processes for upgrading and enhancing the electric grid are insufficient rapid to meet the State's goals. The Public Service Commission should work with the utilities to fast-track electric infrastructure improvements and foster an environment that promotes non-wires alternatives where possible.
2. **EMPHASIS: Clean Energy Siting Support for Local Governments:** We support efforts by New York State to provide assistance to local governments on clean energy siting. We believe that large-scale renewables are necessary, and should be prioritized, for New York State to meet the goals laid out in the CLCPA. Through ORES, the State has created a process that allows for the fast-tracking of permitting; however, more can be done to facilitate siting. The State should work with local governments to identify priority locations, provide increased funding for transmission and interconnection to make those community-identified locations more attractive for private development, and provide incentives to local host communities to make large-scale renewables more palatable in their communities. For example, the United Kingdom is considering a program that would offer free electricity for existing homeowners/residents/businesses within a certain radius of a project. While New York currently offers a small number of host-community benefits to municipalities that have large-scale renewables, these benefits must be significantly increased if there is going to be actual progress in promoting community acceptance.
3. **EMPHASIS: Prioritize Methane Recovery.** As the Plan clearly states, methane is an incredibly potent greenhouse gas and steps must be taken to prioritize reducing the amount that reaches the atmosphere. For essential operations that produce methane, such as wastewater treatment plants and landfills, the Plan should prioritize utilization that leads to combustion (onsite energy production) or conversion (biofuel, hydrogen, etc.). However, efforts should continue to be made to reduce the amount of methane generated by these activities. For landfills, those efforts can include organic waste diversion programs. For wastewater treatment plants, prioritizing more efficient operations could help reduce the amount of methane generated. Ultimately, methane recovery should be the last option after a facility has reduced its methane emissions as much as possible.

Sectoral-Specific Comments

1. **TRANSPORTATION: Reducing Car Dependency.** The Plan should emphasize and prioritize the need to reduce car dependency as a critical component of reducing emissions from transportation. It is not enough to shift to electric vehicles; we also need for people to drive less and choose active and shared transportation options and transit more frequently. Reducing vehicle miles traveled, even if all those miles are powered by electricity, will have positive impact on the climate since it will reduce the demand for electricity and deployment of renewables to create that electricity.
2. **TRANSPORTATION: Enhancing Public Transportation and Mobility Alternatives.** This section should be expanded to address public transportation and mobility alternatives in all of New York State.

The focus is currently on New York City's Metropolitan Transportation Authority and almost exclusively on public transportation. While the public transportation sector needs attention and continued support, it is also well established in having transit agencies, staff, and dedicated funding lines. The Mobility Alternatives sector is nascent and holds tremendous potential. A significant number of trips statewide are under three miles in length and, with adequate support, could transition to walking, bicycling, and other small e-vehicles (such as scooters), all in synergy with transit. The Plan needs more attention to Mobility Alternatives to help capture their potential.

3. **TRANSPORTATION: Expanding the Availability of Low-Carbon Transportation Alternatives.** Bicycling is often the forgotten mode in the development of infrastructure across the state. Not having safe bicycle routes (specifically protected bike lanes and/or multiuse trails in urban areas) is repeatedly identified as the principal factor keeping people from cycling. Other factors are access to bicycles and weather/topography. Of these, the lack of safe networks of bicycle routes is the most critical and most difficult to address. The Plan should be more deliberate and specific in its support of expanding bicycling in New York State. The potential impact is immense, and it works synergistically with all other transportation alternatives and transit in support of the Plan goals.
4. **BUILDINGS: Building decarbonization incentives.** In Tompkins County's work to electrify and decarbonize our government facilities and fleet, we are finding the existing electric capacity and service to buildings to be a major obstacle to moving towards heat pumps and electrified heating and vehicle charging. The costs to upgrade our own connections and connections to the utilities make projects prohibitively expensive and there appear to be few incentives or programs to address this particular barrier. The Plan should prioritize working with utilities to create programs and incentives to overcome these issues.
5. **BUILDINGS: Benchmarking requirements.** We would ask that if the State does collect energy information from New York State businesses, that this information be made available in a generalized format for local governments to assist in planning and economic development, as well as in the creation of climate action plans and greenhouse gas inventories.

Ultimately, however, there is the question of what impact benchmarking buildings will have if it is not paired with regulations that require action on those benchmarking results. New York City's local law 97 places caps on building emissions that makes benchmarking results necessary. Without regulations, benchmarking will likely have little impact.

6. **BUILDINGS: Addressing Affordability Impacts on Underserved Communities from the Proposed Buildings Strategies.** There is no discussion included on how recommended actions could unintentionally impact the affordability of housing and commercial spaces for residents and businesses in Disadvantaged Communities. Although incentives to make improvements to existing buildings are critical to enabling current building owners to decarbonize their buildings and potentially reduce utility costs, such improvements may significantly increase the value of these properties. This may impact affordability for existing owners through increased property taxes, as well as for subsequent tenants or would-be buyers who find improved buildings to be increased in value beyond their means to rent or purchase. Thoughtful consideration of affordability impacts, and potential mitigation measures, should be woven throughout the Building section of the Plan to avoid pricing those in Disadvantaged Communities out of New York State.
7. **ELECTRICITY: Community Choice Aggregation (CCAs).** CCAs are complex programs that require significant amounts of time and resources to establish. One foundational question about CCAs should be addressed: if the ultimate goal of CCAs is to create markets for green power, are CCAs still necessary considering New York State's clearly stated zero-emissions electricity goal? If the State creates a zero-emissions grid, will there still be a need for creating the market for green power consumers?

If the answer to those questions is that there are clear benefits to CCAs, then there are existing issues with CCAs in New York that should be addressed. One major problem is the lack of cost-effective renewable energy certificates, which make promotion of 100% renewable CCAs difficult, if not impossible. Currently, it does not appear that CCAs are promoting the development of renewables in New York. Another concern is that the Plan suggests that counties could opt-in to a CCA program on behalf of every municipality and then each municipality would, in essence, have the option to opt-out. It is unclear how that is a benefit to the current CCA program since municipalities would still need to choose to opt-in or opt-out with a county CCA program, yet they already have the option to join an existing CCA or create their own with other municipalities. It does not seem that the added complexity of creating county CCAs would enhance the program.

8. **INDUSTRY: Natural Gas Allocation Prioritization.** Tompkins County supports recommendations in the Plan to eventually wean New York State off natural gas. With that said, we also acknowledge that natural gas will continue to be utilized for industrial purposes for years to come. We suggest that the State create a strategy that prioritizes providing access to natural gas for industries that are the most difficult to decarbonize while simultaneously injecting funding into research for alternative methods of providing non-carbon-based energy. We support a plan that will continue to allow for existing industrial purposes that provide jobs and revenue to local areas and hope that the State will consider their needs as they move towards closing natural gas infrastructure.
9. **INDUSTRY: Cross-Collaboration Across Industries.** The Plan should include a recommendation to foster cross-collaboration and information sharing regarding best energy practices between different industries. This could be done via shared planning and logistics, the transfer of technology, peer-education groups, and State funding that prioritizes solutions that can impact multiple industrial sectors rather than targeting each in a piecemeal fashion. We believe that there are many opportunities for industries to partner internally, but also with local government and non-profits to seek solutions that will help reduce greenhouse gas emissions across multiple sectors.
10. **AGRICULTURE AND FORESTRY: Forest Carbon Research and Outreach.** There is much work to be done to develop and share best management practices for enhancing carbon storage, carbon sequestration, and climate resilience for New York's forests. With much of the state's forestlands being managed by private landowners, it is critical that the State conduct the necessary research and develop new methods to connect with and share the latest climate science with private forest landowners.
11. **LAND USE: General Municipal Law 239 Review.** The Plan suggests that General Municipal Law - section 239 should be expanded to allow county governments to play a larger role in overseeing development. While the expansion of what can be reviewed under a 239 review may allow more comment from county government, there are currently inherent limitations in the 239 review process that would need to be addressed in order to be effective: county review and input comes late in the development review process when developers are less able to revise plans, local governments may still override recommendations, and not all counties would choose to implement this expansion. Without changes to the law, it is hard to see how this action would truly further smart growth priorities.
12. **LAND USE: "Keep Forests as Forests" law.** We suggest that the proposed law incentivize developers to purchase and reforest land to offset the lost forest carbon, going beyond the suggestion to preserve existing forestlands. Reforesting and protecting newly reforested lands would lead to more carbon sequestration than simply preserving existing forests.
13. **LAND USE: Resources for Long-Term Management and Monitoring.** The Plan includes several recommendations to acquire land and conservation easements (including forests, wetlands, and habitat connections) to protect those important resources. That recommendation should be paired with the funding required for the long-term management of those resources.

14. **LAND USE: Strengthen Right to Practice Forestry Law.** Efforts to amend this law, as proposed in the Plan, should also establish best management practices for forest operations that optimize carbon sequestration by forest lands. Requiring such practices should not be considered unreasonable restrictions or regulations on forestry operations.
15. **LAND USE: Protect and Restore Wetlands.** Federal protection of wetlands is in flux and the State should establish its own criteria and regulations to protect the current wetlands resources and enhance them as carbon sinks. We also note that the State already faces significant capacity issues when it comes to wetland monitoring, mapping, and protection and suggest that the Plan recommend more funding be provided to build State and local capacity to accomplish the recommendations included in the Plan.
16. **LAND USE: Update Wetland Mapping Using Modern Technologies.** The recommendations identified in the Plan are sorely needed to update the existing state wetlands maps and provide consistency across multiple county and regional approaches to mapping wetlands. A consultant developed a methodology for mapping wetlands in Tompkins County using modern data and those methods could be applied State-wide to update wetlands maps.
17. **LAND USE: Expand Scope of Planning Requirements.** The Plan recommends requiring inclusion of forestland and farmland protection in State-funded municipal comprehensive plans. However, most municipal comprehensive planning efforts are not State funded. The Plan should recommend that all comprehensive plans be required to address forestland and farmland protection.
18. **LAND USE: Provide State Support for Comprehensive Plans.** The Plan recommends that the State provide support for comprehensive plans and their implementation, presumably through the promulgation of form-based codes. The Plan should clarify how such codes would impact greenhouse gas emissions. Furthermore, the Plan also suggests that municipalities include moratoria for certain types of development while they update plans and zoning. Given that moratoria are often challenged in the courts, we would suggest that the State consider the impact of legal challenges on municipal governments that can ill-afford them.
19. **LAND USE: Consolidating All State Funding Opportunities.** The Plan recommends that all State funding programs be included in the annual Consolidated Funding Application (CFA). This approach will put more of a burden on applicants, including smaller municipalities, to prepare applications for multiple projects simultaneously – a significant barrier for those with limited staff resources. One way to mitigate that impact is to provide for more than one round of CFA applications per year, potentially quarterly. This would help smaller municipalities, counties, and other organizations with limited grant-writing capacity. In addition, having more frequent rounds will improve the ability to take advantage of opportunities that arise outside the normal funding cycle.
20. **LAND USE: Sustainable Development Resource Guidebook.** The recommendation to create a Sustainable Development Resource Guidebook is a good idea, but we believe it to be of lower priority than other recommendations. If such a guidebook is developed, it is very important that it be kept up to date.
21. **LAND USE: Addressing Impacts on Underserved Communities from the Proposed Land Use Strategies.** There is little discussion included on how recommended actions could unintentionally impact Disadvantaged Communities or how actions could be targeted to reducing negative climate impacts in those communities. One example is that the Plan could identify the potential impact on the tax base of low-income communities of land acquisition for conservation, and then go on to address how to mitigate that impact. Another example is that land protection efforts that mitigate future flood impacts could be prioritized in watersheds upstream of disadvantaged flood-prone communities. Thoughtful consideration of such impacts should be woven throughout the Land Use section of the Plan.

22. **LAND USE: Municipal Coordination with Transit Entities.** We support the Plan’s recommendation to require municipalities to notify transit agencies of planning and development projects and further suggest the notification should be required to come very early in the planning process to allow adequate opportunity for plans and projects to incorporate recommendations from the transit agencies.
23. **LOCAL GOVERNMENT: Modernization of Carbon Accounting and Community Dashboards.** The Plan contains two recommendations that we feel are tied together – the incentivization of modern carbon and methane accounting to facilitate data accessibility and the launching of a community dashboard. These two recommendations would help create a more standard and “modern” process for greenhouse gas accounting across the state, while also providing a clearinghouse for residents and groups to obtain useful information related to local emissions.

While we support the drive to standardize municipal accounting methods and to make data more accessible, we feel that these recommendations do not go far enough. Tompkins County has been preparing greenhouse gas (GHG) emissions inventories for over 20 years and the process has become more and more unwieldy as GHG accounting has become more complex. Given all the hopes in this Plan for steps local governments can take to reduce emissions does it make sense to continue to rely on the limited resources of local governments to prepare their own GHG inventories?

Rather than relying on disparate local governments to prepare greenhouse gas emission inventories for their government operations and their communities, the State should conduct the inventories on behalf of local governments. Many local governments have limited staff resources, limited funding resources and limited expertise, which should be focused on implementing actions to reduce GHG emissions in their government operations and within their communities. The State should provide the emissions data that local governments need so that they can prioritize these actions.

24. **LOCAL GOVERNMENT: Expand NYPA Clean Energy Services Program:** The Plan suggests that NYPA’s Clean Energy Services program could be expanded to offer more services that could help facilitate the clean energy transition. While we are supportive of NYPA and its programs, we have also found that the requirements of their programs constitute a major barrier to participation. Project size, in particular, can often be prohibitive for small municipalities or for one-off projects, necessitating aggregations that are overly burdensome on staff at both municipal governments and NYPA itself. Furthermore, it has often been unclear whether there is any financial benefit to using NYPA services over private contractors and developers. If the State wants to utilize NYPA to its full extent, these issues must be addressed first and foremost, and this should be done before attempting to extend their services further.
25. **LOCAL GOVERNMENT: Expand the Regional Coordinator Network:** We appreciate the work that the Regional Coordinator Network has been able to accomplish in the last few years and believe that coordinators serve a role in providing support to local governments that lack capacity to help implement State-suggested actions. We suggest that before the Regional Coordinator Network is expanded, that the State rethink how the Clean Energy Communities and Climate Smart Communities programs themselves are structured and what actions they are promoting. Coordinators are valuable assets to communities, but they rely on the structure of the programs to dictate their tasks and what support they can offer. The State should review these programs to maximize their impact on greenhouse gas emissions and consider making the program more attractive by returning to the funding levels and simplicity that were offered in previous iterations of the Clean Energy Communities program, and by providing incentives to communities to participate in the Climate Smart Communities program.
26. **LOCAL GOVERNMENT: New York State Solar Permit Promotion.** The Unified Solar Permit has been in existence for many years, and at this point it is likely that the municipalities that are going to adopt the unified solar permit have already done so. Furthermore, this recommendation is limited in impact and does not seem to be a high priority. As stated earlier, if the State would like to see permits or

policies enacted, it may be better to have them passed and adopted at a statewide level versus attempting to have each municipality adopt the process individually.

27. **LOCAL GOVERNMENT: Community Scale Campaigns.** The Plan suggests added support for municipalities to complete community campaigns. Tompkins County was one of the first counties in New York State to have a solarize campaign and is also the location of several HeatSmart campaigns. While these campaigns have led to the adoption of technologies, they have also required a tremendous amount of funding and volunteer effort which we do not see as sustainable or replicable across the State. The level of adoption the State needs for heat pumps, solar, and electric vehicles go far beyond what can be accomplished by local community campaigns.
28. **LOCAL GOVERNMENT: Expand Workforce Development for Clean Energy Economy.** We fully support efforts to expand workforce development for the clean energy economy. The Plan's recommendations should broaden efforts to include working with School districts, BOCES, and Community colleges - all have relationships with the State, and we believe they can and should be more heavily utilized.
29. **LOCAL GOVERNMENT: Reduce Grid Interconnection Costs.** We support the Plan's general recommendation that interconnection costs for municipally owned priority sites for hosting renewable energy systems should be reduced. However, this should not be limited strictly to solar, and not only should the price of interconnection be investigated, but also how long utilities take to establish the interconnection. Furthermore, the point of interconnection is only one barrier to these sites. Often municipally owned priority renewable energy sites are not at locations conducive to distribution and transmission. Funds should be allocated to help strengthen and build connections to these locations.
30. **LOCAL GOVERNMENT: Support Direct Energy Purchasing.** Rather than focusing State support for municipalities to procure energy directly from wholesale markets, the State should prioritize support for municipalities to buy and procure New York State-specific renewable energy certificates or foster direct power purchase agreements between municipalities and renewable developers.
31. **LOCAL GOVERNMENT: Support Fleet Electrification.** The recommendation in the Plan includes a general note on supporting municipal and school fleet electrification. While additional monetary support for vehicles and infrastructure, particularly fleet infrastructure, would be welcomed, the State could also provide leadership by leveraging coordinated buying power via statewide contracts, as is done in California, to help municipal fleet procurement. Also, providing additional resources and guidelines to municipalities to enable them to evaluate and right-size their fleets would help to reduce total numbers of vehicle miles traveled and prioritize the miles traveled to vehicles that are low/no carbon emitting.
32. **LOCAL GOVERNMENT: Support for Energy Benchmarking.** The Plan recommends that local governments track and report the energy use in their municipal buildings and facilities, what is commonly known as "benchmarking." While helpful, the effort required to maintain records for smaller governments usually outweighs any potential benefits. We believe the Plan should recommend utilities provide this information to local governments in a convenient manner that allows for easier benchmarking. One meaningful step the State could take would be to require New York State utilities to be compatible with automatic EPA Energy Star Portfolio Manager uploads.
33. **LOCAL GOVERNMENT: Support for Greater Government Waste Reduction.** For most municipalities, waste will not be a major driver of their own government operational emissions. We recommend that support should focus on community waste reduction with funds committed in that area rather than focusing on government buildings that are relatively small generators of waste compared to the entire community.

34. **ADAPTATION & RESILIENCE: Climate Change Projection Planning Documents.** New York State climate change projection documents have been very valuable in local planning but would be even more valuable if they were updated more frequently. Regular updates should be made by the State and information should be shared with communities through a variety of formats to enable more effective municipal planning around climate change adaptation and resiliency.
35. **ADAPTATION & RESILIENCE: Resilient Design Guidelines.** We support the recommendation to develop and utilize climate-resilient design guidelines for State-funded projects. Sharing those guidelines with municipal officials and developers would also support municipalities who want to incorporate resilient design within their own local land use laws. Widespread use of the guidelines would help the State evaluate whether they should be incorporated into the New York State building code in the future.
36. **ADAPTATION & RESILIENCE: Resilience Audit Program.** The Plan suggests the creation of a Resilience Audit Program for residents and small businesses. This idea has merit since it follows successful local models of providing tailored analysis and recommendations for homeowners, renters, and businesses, as we have seen with our Tompkins County Business Energy Advisors Program (BEA). As with the BEA, it would be especially critical for the implementation of audit recommendations to pair the audit with funding to address identified issues and opportunities.
37. **ADAPTATION & RESILIENCE: Post-Disaster Strike Teams.** Another recommendation in the Plan is the creation of post-disaster strike teams. This sounds like FEMA post-disaster response teams, and it is unclear how they would differ. We suggest clarifying how the two teams would co-exist, how their purposes would differ, and how the impact of post-disaster strike teams could improve recovery in ways that are not currently addressed.
38. **ADAPTATION & RESILIENCE: Community Rating System.** We support recommendations to help strengthen participation in the Community Rating System (CRS) statewide. We suggest the best way to encourage community involvement would be to provide local communities funding to allow them to increase staff capacity to administer the program. Our research has indicated that participating in CRS can be incredibly time consuming, taking at least 13% of a full-time equivalent position, and requiring capacity beyond what most municipalities have available.
39. **ADAPTATION & RESILIENCE: Grid Strategies for Extreme Weather Disruption.** We strongly support recommendations that will help harden and strengthen the electric grid to prepare for extreme weather disruptions. It is critical that, as the State moves largely towards electrification of heating and transportation, infrastructure must be even more resilient against the impacts of severe weather patterns that will be brought about by climate change. Additionally, the State should prioritize battery energy storage systems over fossil fuel-powered generators for all State-funded projects.
40. **ADAPTATION & RESILIENCE: Wildlife and Habitat Connectivity.** We support recommendations to improve wildlife and habitat connectivity. Tompkins County currently does this through its Natural Infrastructure Capital Program where funding is provided to preserve lands that have been identified as important for habitat connectivity in a changing climate. The State could create a separate fund, or prioritize existing funding within the Environmental Protection Fund, to focus on habitat connectivity projects.

Thank you for the opportunity to provide comments on this substantial piece of work; we commend all involved for your dedication in creating this thoughtful, inclusive Plan.

Sincerely,



Katherine Borgella

Commissioner of Planning and Sustainability