June 28, 2022

NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

RE: Draft Scoping Plan Comments

The NYS Climate Action Council Draft Scoping Plan contains many flaws. Although the shift to renewable energy is inevitable, the implementation process provided in this plan reads as a "one-size-fits-all" approach and doesn't take the vast rural areas of New York State into true consideration.
New York State is so diverse in population density, different approaches for each community based on their urban, suburban, or rural, or even ultra-rural nature must be considered. To become completely fossil-free, this plan would require every homeowner in New York State to convert to an electricity-based heating system. Rural homes like those in Chenango County are susceptible to power outages due to failing infrastructure, harsh winter and summer storms, and other lesser common weather events. In these situations, generators predominantly run by fossil fuels would be required to keep families safe, particularly during our harsh winters with bitter cold snaps. Homes with an elderly individual, very common in counties like ours, would be put at substantial risk.

This plan would also put the agriculture industry, one of the largest economic drivers in rural areas like Chenango County, at risk of failure. Farmers spend long hours spreading manure and planting and harvesting crops at all hours of the day. The feasibility of an electric tractor in our area, let alone the expense burdened upon them, is unrealistic. The capital costs placed on our already struggling farmers would put more of them out of business. Counties like Chenango County rely heavily on agriculture as a means of employment. The lands currently being used for hay, grain, vegetables, and livestock are becoming susceptible to being leased or sold to solar companies and electrical substations. Without agriculture in rural communities such as Chenango County, the economy will falter, and leave many without the farms and lifestyles that their families have thrived on for many years. With threats of food insecurity due to worldwide crises, we should be finding every possible way to bolster our agricultural industries rather than harming them and ultimately putting them out of business.

Infrastructure in rural areas is lacking. EV Charging stations and the availability of public transportation is nearly non-existent or stretched incredibly thin. Until New York State can verify there are enough EV charging stations for every vehicle in New York State, more investment is needed, and needed quickly before any sort of requirement for electric vehicles should be imposed.

New York State thrives on being a home-rule state, meaning municipalities have the right to decide what happens in their backyards. Out of the 30 towns, villages, and cities in Chenango County, seventeen (17) of those municipalities have a local site plan review law. To be able to better regulate the type of development that occurs in their respective municipality, towns and villages rely on home rule law to determine the types of

development best suitable for their municipality. New York Constitution Article IX states "... every local government shall have power to adopt and amend local laws not inconsistent with the provisions of this constitution or any general law relating to its property, affairs or government and, (ii) every local government shall have power to adopt and amend local laws not inconsistent with the provisions of this constitution or any general law relating to the following subjects, whether or not they relate to the property, affairs or government of such local government, except to the extent that the legislature shall restrict the adoption of such a local law relating to other than the property, affairs or government of such local government". This plan assumes that every county is onboard with the initiatives included in this plan.

Large solar and wind farms, electrical power lines and substations are going to be needed to sustain larger urban areas such as New York City, Long Island, Albany, and Buffalo. The land that will be used for this is assumed to be the rural areas of New York State with little consideration to the impacts and with little benefits of the electric that is being produced. Many rural communities cherish the scenic beauty of the area and feel the inclusion of additional wind turbines, vast solar arrays and high-voltage lines will detract from its natural beauty, as evidenced from the monumental grass roots efforts of the Citizens Against the Regional Interconnect (CARI) campaign in the early 2000's in opposition of the New York Regional Interconnect (NYRI), also known as "Pegasus" project. This plan seems to ignore the thought of home rule, and ultimately gives the state the ability to determine development, rather than leaving it up to the municipality. Rural New York State is not, and should not, be required to sustain the unattainable utopian dreams of those living in urban centers.

With a plan of this magnitude, all factors need to be taken into consideration. It needs to take all of New York State into consideration. The NYS Draft Climate Scoping Plan seems to expect rural areas to produce the energy needed with urban areas reaping the benefits of the energy produced. While a shift to renewable energy is needed, this plan is utopic and expects very little hiccups. Not taking into consideration the capacity and power that will be needed to make this plan a reality, especially in such a short window of time. Action needs to be taken now but the expectations of this plan are unrealistic and seem to ignore the larger picture.

If you have any questions, please feel free to reach out to me at any time by phone at (607)337-1640 or by email at shaneb@co.chenango.ny.us.

Best Regards,

Shane H. Butler, Director of Planning
Chenango County Department of Planning and Development