**April 26, 2022**

**Comments to New York State’s Climate Action Plan**

Thank you to the members of the Climate Council for the determined effort to design a plan to deal with the important work needed to resolve the impacts of anthropogenic climate change. May these comments please be considered and incorporated in the final plan for New York State:

1. **Work in harmony with other states**. Lead by cooperation and coordination, not just by ideology. Presently 34 states have developed a Climate Action Plan, or are in the process of developing a plan. The interests of New York, the majority of the states and current national policy are aligned! For this reason, I comment that the proposed plan needs to be more honest with regard to the cost of implementation. Add a stronger direction to work with others.
2. **Central New York median household incomes are appreciably below the state average and New York City’s – the plan needs to be fair and affordable for all.** In Oswego, Onondaga, Cayuga, Chemung, Cortland, Madison, and Broome Counties – for example – populations are down, whereas NYC has grown its population. Western New York, the Southern Tier, the North Country – all are struggling. Do so much more to recognize this is the plan and in the implementation actions proposed. Note for example that Broome County has a higher percentage of population in poverty than any of the above-mentioned places, 18.4% living in poverty.
3. **New York State is both rural and urban, the plan needs to better reconcile this diversity.** As a recognition of its rural nature, please note that the census bureau reports that Broome, Cayuga, Chemung, Cortland, Madison, and Onondaga Counties all have lower broad band access than the state average. This is a clear sign that these rural populations will be difficult to convert to all electric heat; electric grids will be as hard to restructure as rural broadband. In fairness to this rural demographic, access to electric vehicle charging and mass transit will be especially difficult in rural New York. The plan needs to be truly inclusive to all, including rural New York and all those facing economic challenges on a daily basis. It is worth spending extra thought on how the plan needs to be inclusive and just for all. The dignity of working rural populations needs to be championed by just transition and acknowledgement that not every New Yorker works in an office, or in the finance sector.
4. **Keep biosolids clean so they can succeed in the plan.** The plan identifies the need to capture and sequester more carbon in the waste management practices. Both solid waste and wastewater sectors will be challenged by sources of PFAS/PFOS entering the waste stream and becoming part of residuals. Biosolids land application from organics digestion and wastewater digestion is a critical future component of building soils and sequestering carbon. The plan needs to amplify the need to land apply biosolids and therefore the importance to controlling fluorinated compounds at the consumer and industrial level. Wastewater and solid waste programs cannot treat forever chemicals that contaminate biosolids. The plan should urge actions to make and keep biosolids clean and beneficial for use as soil additives and in carbon sequestration.
5. **The plan needs to better recognize the importance of biogas in future transition.** Wastewater treatment and organics digestion reduce waste volumes and create renewable fuel for process uses. Recognize the use of this bigas in the plan, avoid bans on the use of biogas.
6. **Recognize opportunity to use multipronged solutions.** Rural New York is littered with hundreds of old gasoline stations that are plagued by impacts from old leaking underground storage tanks. The State should adopt pragmatic generic cleanup standards to rapidly repurpose these old sites with brownfield investment to convert these eyesores into charging stations at modern convenience stores. EV charging locations will be critical to transition in the plan. Take bold steps to enable abandoned gasoline stations to be rapidly cleaned to pragmatic standards appropriate for future use as commercial charging locations. Remake old abandoned gasoline stations, take direct action toward charging location development that work to restore villages and hamlets burdened with these problem sites. Use brownfield and UST funds to drive ease of EV access throughout New York State. Take bold action to marry existing programs to the proposed transition plans. The farmer will still need a pickup truck and New York will need to make its charging simple and easy. The rural, lower income, New Yorker will need a passenger vehicle to go to work. Make the infrastructure necessary for rural charging access readily available by aggressive application of brownfield and municipal cleanup funding. Put old gasoline service stations back on the tax roles as centers of commerce and points of easy EV charging. EV charging should not just be available to the rich, or on the Thruway, or at high end tourist destinations. Old gasoline service stations were sited by their convenience. Repurpose them for the coming decades.

Thank you for the opportunity to submit comments to the proposed plan. Please consider ways to be sure the plan is fair and inclusive for all New Yorkers.

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