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Draft Scoping Plan Comments NYSERDA 17 Columbia Circle Albany, NY 12202-6399

TO WHOM IT MAY CONCERN:

I have been reading your draft scoping plan, along with its related documents, and I have the following concerns - even though I am only half way into it, but the comment deadline is rapidly approaching, so here goes.

I understand that changes need to be made to help protect the environment but I do not think that you have considered what people will have to do to even come close to complying with your requirements, or if the proposed compliance in some areas is even possible.

I am retired, live with my retired wife in a "disadvantaged community" in Allegany County, in an approximately 70-year-old single family home. Currently, our heat and hot water use natural gas, with a natural gas fueled home generator to accommodate my wheel chair lift and household power during a power outage. Pricing out the changes that will be needed to be made by us, at today's prices, have shown that not only will conversion to your ideals be prohibitively expensive and that the availability of needed materials and installers does not currently exist.

I have yet to find any provisions in your plan to make sure the electrical grid is brought up to being able to handle the increased load that a totally electric world will place on it in the time frame that you are pushing.

Also, are the energy code requirements for electric heat going to be relaxed? I know our three and a half inch thick fiberglass insulated walls are nowhere close to meeting today's R-value requirements for a totally electric building and making it so would require a total re-build. Are you going to pay for it?

And then, if natural gas, propane, fuel oil, wood, etc. are eliminated per your proposals (zero emissions) – where will localized, point of use (homes, stores, hospitals, fire halls and areas of community refuge) emergency power come from in the event of a utility grid failure – especially in mid-winter? I'm not aware of any battery powered generators available out there, are you? Or even enough battery banks? Who will pay for them?

What proposals do you have for keeping battery powered emergency vehicles running during long duration emergency situations? Or are we supposed to be ready to accept the fact that responses to emergencies as we know it now will cease to exist?

Your all-electric vehicle world is a fantasy-land that current technology is incapable of attaining. Nor is the forecast of such vehicles capable of being useable anywhere but in flat areas becoming available soon enough to meet your deadlines, with prices predicted to be in the one hundred thousand dollars plus range, how many people do you think could afford one of these?

I have also not yet seen anything in your plan that would deal with the thousands of households that depend on wood/coal/kerosene/fuel oil heaters for winter heat. What are they supposed to do - freeze? We have a large Amish population around here in Western NY – who do not have any electrical supply in their homes. Zero emissions – I doubt it - unless you're going to force them to convert – I'll watch that from a distance, thank you. Or are you going to force them to move elsewhere? Along with the non-Amish who have to use these fuels for heat and cooking due to the high prices of, or the unavailability of, even natural gas where they live?

You predict that all of those who will lose their jobs due to the elimination of fossil fuel (gas stations, natural gas workers, etc.) will be able to get retrained for higher paying high-tech jobs.

Nowhere yet have you shown where your figures come from, or how this will be accomplished.

You repeatedly list actions that various government agencies must take to make your ideas happen – but no time line for their compliance, only timelines for us to comply.

Your computations on the value of Green House Gases (GHG'S) in <u>harvested</u> timber make no accounting for the facts that once harvested, that tree is destroyed, no longer there doing its thing, and that it will take several decades for a replacement tree to be able to perform as its predecessor did.

You expound on the increased use of ground sourced heat pumps (GSHP) but what will happen when millions of people start drawing the residual heat out of the ground? Will we then still have snow on the ground in August instead of April due to the colder ground?

What about those who do not have the room for the piping needed to "feed" a GSHP?

Our small lot would need a vertical installation – and getting the appropriate drilling equipment on site would be next to impossible - as well as prohibitively expensive. And we are not the only ones in this village in this same situation.

Nothing has been said so far regarding curbing further destruction of the existing natural environment – trees and brush and grass, by un-controlled development - by mandating the reuse and repurposing of existing facilities over building new sprawling monstrosities. The same monstrosities that cover acres and acres of ground with impervious materials that funnel rainfall into nearby creeks and rivers, overpowering their drainage capabilities, instead of allowing this water to soak into the landscape – as it used to, thus promoting increasing damages due to increased flooding – one of the main reasons that flooding is getting worse – not just GHG'S!

I'm only on Chapter 12, I can't wait to see what the remaining 12 Chapters, and Appendices, reveal!

In short, many of your accelerated proposals are not feasible and need to be redone based on reality, not wishful thinking on your part – or the desire to be "the first with the toughest". New York State has dropped the ball many times so far trying to be "first".

Sincerely,

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W Kelly, Fr.

Cuba, NY

cc: Buffalo News, Wellsville Sun, Olean Times Herald, Cuba Patriot, G. Borrello, J. Giglio