

Climate Action Council
17 Columbia Circle
Albany NY 12203

Submitted via email

Dear Madam or Sir:

The comments below address the New York State Climate Action Council's Climate Leadership and Community Protection Act (CLCPA) Draft Scoping Plan ("the Plan"). I have listened to numerous meetings of the Climate Action Council (CAC) and other groups and submitted written and oral comments. I have offered insights into how the CAC may better understand the needs and abilities of rural upstate residents, and I am doing so once again.

While I can see that considerable work has gone into the Plan, it reflects a willful naivety and closed-minded view of how to address climate change. Given that New York State is responsible for a tiny portion of global emissions, we must assume that New York's actions will have little actual effect on climate change. It is important to recognize that fact. We cannot fix the world, or even our corner of it.

The CAC consists largely of urban members who seem more interested in presenting an absurdly rosy view of the future than in facing the realities of climate change. Notably, the CAC membership does not include representatives of the nuclear energy industry. We live in a society where questioning this rosy view of the future is not tolerated. The CAC's approach does not represent the views of many rural communities and their very different needs; consequently, our concerns are largely ignored.

Knowing that alternatives exist does not ensure access to them. Taken as a whole, we are a reasonably wealthy state, although that wealth is not evenly distributed between urban and rural areas. Many urban areas can afford to make the changes required by the Plan. Most rural areas cannot. Our standard of living will steadily decrease over time

For example, in rural upstate New York, few of us can afford to buy new EVs, or even used ones. Gasoline prices are likely to rise more as internal combustion engines become less common; any economies of scale are less likely to apply, especially in remote areas. The cost of parts and repairs will become more burdensome.

Getting rid of woodstoves is an example of the CAC's failure to understand the need of rural residents. For generations some families have maintained a woodlot in order to heat their homes with woodstoves. Many of those families cannot afford to heat exclusively with fossil fuels, and again, they certainly cannot afford to buy heat pumps and other electric heating equipment.

The rural residents who most rely on private transportation have no access to mass transit. They need cars. Electric pickup trucks coming on the market have woefully low load and towing capacities and enormous price tags for the people who most need them and are least able to pay for them.

Additionally, it is difficult to see how owners of the many older houses in rural New York will even be able to upgrade their electric service to accommodate EVs, heating systems, and all-electric appliances. Many such residents have 60-100 amp service that will require expensive upgrades; the cost of providing adequate service for EV charging in addition to running all-electric appliances, water heaters, and heating systems becomes prohibitive. Upgrading household service costs \$3,500-4,500. Most rural households have two vehicles; given that charging a car can require up to 40 amps, charging *two* at once may require far more expensive upgrades. Rural electric distribution infrastructure is often inadequate to accommodate the needs of all-electric households. The relatively long distances traveled by rural residents may require much higher mileage capabilities than are presently available.

The CAC fails to consider the feasibility of what the Plan proposes. It does little to mitigate the very real effects of climate change, leading me to wonder whether the CAC is using actual science rather than bowing to the influence of politicians and the climate industry. When I inquired of NYSERDA what specific data was used in developing climate policy, I was told vaguely that this material was documented in many places. None were specified. What studies were used to form ex-governor Cuomo's decision to require 6,000 MW of new distributed solar capacity? Was that number based on fact or whim? What was the scientific basis for the new governor raising that number to 10,000 MW? On what science was that nice, round number based?

The CAC has concentrated almost exclusively on happy stories of the Plan's future success. It seems to view climate change as a pleasant opportunity implement a socially popular agenda and appears unreasonably optimistic. Why does it not fully address the need for distributed, zero-emissions, constantly available energy sources that must be available when sunshine and breezes cannot power the grid, as outlined in Analysis Groups research for the NYISO? The Plan effectively says "we'll figure out something." That is not an acceptable approach.

Climate change—which our state cannot by itself stop—will ultimately require actual, practical mitigation. We will need better defenses against flooding and rising sea levels. We need to prepare our infrastructure for more severe storms. We need to ensure a reliable food supply in a world where crop failures are growing more common. Will we have the resources to do all of this when we're pouring money into solutions we don't even know will work? We need to protect our most vulnerable communities, whether it means providing air conditioners to disadvantaged populations or building seawalls.

The climate industry profits from climate change. Our state government has embraced the industry as an altruistic force, even appointing its representatives to the CAC. The climate industry's primary goal is making a profit; fighting climate change is at best a secondary concern. Enormous amounts of money are being exchanged, but "ordinary" New York residents are not benefiting from these expenditures.

We must also recognize that many people live in a state of climate doubt, not climate denial. Those who merely question whether climate change is anthropogenic are shunned and silenced, even censored.

After reading it, I have little confidence in the Plan's feasibility. Its solutions lack merit, and its approach seems facile. Its scientific basis is unclear. The ambition to succeed does not guarantee success, yet the the Plan offers no alternative. We need to assess other options. The plan should accept the very real possibility of failure and consider developing a "Plan B" that includes preparing our infrastructure and our population for the actual effects of climate change. We need reasonable, practical solutions, not overreaching ambition.

Sincerely,

Kris Martin
Chautauqua County NY