



City of Saratoga Springs
OFFICE OF THE MAYOR

Mayor Ron Kim

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Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

June 28, 2022

Dear Climate Action Council:

Thank you for the opportunity to comment on the Climate Action Council Draft Scoping Plan (Plan) dated December 30, 2021. Saratoga Springs has been working to implement solutions to the threat of climate change through city and civic efforts for 20 years. The City of Saratoga Springs applauds the efforts of the Climate Action Council, the Climate Justice Working Group, the Advisory Panels, and associated staff that helped develop the draft scoping document. Because we also strongly support the goals of the Plan, we offer what we intend to be constructive comments and suggestions from the perspective of a small city.

An important question seems to be, does this Plan match the speed and scale of the changing climate and its impacts? We are cognizant of the increasing danger that a rapidly changing climate poses to New York State. Among other threats, scientists warn that the Thwaites Glacier in Antarctica could collapse within the next three to five years which would result in a precipitous 65 centimeter (~2 feet) sea level rise. Although the coastal areas would be most affected, all other areas of the State would have to absorb large shifting populations while also experiencing the effects of the enormous financial losses through budgetary shifts and potential tax increases. When the potential losses are considered, it becomes paramount that the state fund its climate mitigation strategies generously. We fear that in 20 years, hindsight will show that more vigorous efforts could have not only saved large sums of money but much human and ecological misery, as well.

Overall Comments

General Support

The City strongly supports the Plan in general. We applaud the bold scope, ambition, and timeline, which are all necessary to meet New York State's nation-leading climate and equity goals. The State's analysis



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shows that the massive, necessary transformation needed to reach the goals is not only technically feasible, but will create tens of thousands of jobs and improve public health. The City is supportive of this but also strongly urges the State to be fully transparent about the projected cost and economic impacts of the Plan, especially the potential cost impacts on municipalities.

While we offer comments below, we also recognize the urgent need to move forward quickly. The risk inherent in slowing down the process (to refine, provide additional study, etc.) is greater than the risk inherent in adopting a final scoping plan that is not absolutely perfect. The Plan is very strong as is, and it can (and should be) refined during implementation.

Challenges and Hurdles:

Small cities face significant hurdles that impede our ability to reduce the City's greenhouse gas emissions quickly and on a scale the crisis requires.

1. **Statewide Regulatory Approach:** We encourage the State to identify critical laws and regulations relative to climate mitigation and enact them on a state level. However, we also recommend that the state solicit local government and multiple stakeholder input to understand challenges and to mitigate potential barriers to the local implementation of state regulations The recommendations in the Plan for various municipalities to develop and share model regulations is not optimal when compared to the potential effectiveness of statewide regulations. For example, the time and effort enacting the Stretch Building Code in every city and town in New York State is slow and inefficient compared to mandating statewide building code improvements. Moreover, many towns and cities will *not* adopt a Stretch code due to additional staffing to enforce and review projects.
2. **Municipal staff funding and capacity building:** Most small cities, including Saratoga Springs, do not have the staff, resources and in some areas, the expertise needed to apply for and manage grants and implement projects. Will the State provide funding for the resources and additional staff dedicated to climate related projects?

Municipal staff, elected officials, and committee/land use board's member need adequate training and support. Mitigating climate change and improving resiliency is multi-disciplinary. Educating and empowering staff in all departments will be necessary to move projects forward. The State needs to provide support to build capacity and increase climate knowledge throughout the organization. Staff need technical knowledge, communication tools, and leadership and business skills to work effectively and efficiently.



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The State could work with organizations such as the Urban Sustainability Director's Network (USDN) who have experience with education and capacity building. Since 2008, the USDN has brought local government sustainability practitioners together and provided mission-critical resources to support sustainability practitioners develop solutions to accelerate the work of local sustainability. They provide training, peer-to-peer learning, and share vital information on the challenges and successes of project implementation. Hundreds of USDN members work together in Peer Learning Groups, Collective Action Groups, and other projects tackling dozens of topics. The aggregated impact and influence of the collective work makes an equitable, resilient, and sustainable society more attainable. The currently role and scope of NYSERDA's Clean Energy Advisors will not fulfill the breadth of this need.

- 3. Significant Resources:** The City supports the Plan's goal of 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. 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. Retrofitting existing housing and commercial buildings will not be easy as most people have little understanding of energy efficiency and conservation. By example, during our Solarize Saratoga campaign, three households inquired about solar panels while having zero insulation in their attics (insulation would provide more benefits). Innovative programs will be required to achieve substantial efficiency improvements in existing building stock and communicate this information to the public. Increasing electrification will also require grid improvements to keep pace with demands.
- 4. Clean Energy Community Dashboard:** The City supports the direction of the Clean Energy Community Dashboard action described, including the modernization of carbon and methane accounting and the production of community dashboards through which various stakeholders could obtain useful information related to local energy use and GHG emissions. The New York State Statewide Greenhouse Gas Emissions Report is a foundational component of the State's strategy for addressing climate change, but it currently does not provide municipal, county or regional data sets. Data needs to be provided not just on economic sectors but at a regional level similar to NYSERDA's ClimAID Report approach and updated regularly. Regional data and matrixes on key economic risks, vulnerabilities, and benefit cost analysis will help target effective actions. Data for this dashboard should be provided to municipalities and supported with automated data transfers provided through APIs and/or ETLs. Municipalities do not have the staffing or tools to constantly update dashboards on their own.



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The State should assist with municipal GHG inventories. State support and guidance would make the inventory process more consistent (all communities counting emissions the same way), more efficient (one concerted central effort as opposed to many smaller, disconnected efforts), and more transparent (all data made available in a central location available for free public use). The GHG accounting process has become more complex and time consuming over the years, and individual municipalities, especially small municipalities, most often lack the staffing and resources to complete this task.

To reduce energy usage, municipalities need access to property utility usage to target effective action. Without this data, municipalities are at a loss on who to target, energy code enforcement outcomes, the effectiveness of energy efficiency and renewable energy campaigns, and usage of non-municipal electric vehicle chargers in their communities. Allowing municipalities' access to data on energy consumption can help assist them in evaluating trends in energy use, direct programming, and optimize staff time focusing on measures that are effective. To this end, the state should work not just with electric, gas, and water utilities to facilitate an easy transfer of data into EPA Portfolio Manager, but also with delivered fuel companies (e.g. propane), who could provide annual data to facilitate benchmarking in the same way. Local governments should have access to building-level data to enable local policies; this data may have to be shared under a non-disclosure agreement for privacy reasons.

Municipalities also lack tools to help track the effectiveness of multi-modal transportation implementation. Again, there are opportunities for the State to help municipalities track mode shift after implementation of Complete Streets improvements and assist municipalities install Smart City technologies and Advanced Traffic Management Software (ATMS) to collect real-time traffic data leading to reduce traffic congestion and improvements in air quality. Municipalities will also need funding to maintain these dashboards after implementation.

5. **Programs** such as NYSERDA's Clean Energy Communities Program and the New York State Department of Environmental Conservation Climate Smart Communities Program outline potential action items and projects but it would help if the State prioritized actions to achieve the maximum GHG reductions as well as yearly timelines and goals. We recommend focusing on initiatives that can be implemented quickly and targeted to the most effective greenhouse gas reduction efforts based on local and regional factors and drivers. Sources of GHG emissions in the North Country differ from New York City.



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Additional Considerations:

Tompkins County identified some additional concerns that could be addressed in the Scoping Plan with which we agree. We recommend:

1. Including candid estimates of costs of climate mitigation and adaptation but also a clear outline of the costs and potential losses of inaction.
2. Including manufactured homes in energy codes and the creation of programs to improve them.
3. Address the “split-incentive” problem by requiring landlords to make energy efficiency improvements and/or make energy costs of rental properties transparent to prospective renters.
4. Including regulations that address methane leakages from all sources but especially natural gas infrastructure, given the much higher global warming potential of methane.
5. Addressing the causes of algal growth in local water bodies giving increasing temperatures and the potential for drought. Adaptation efforts will have to include drinking water protection.

We also agree with two areas identified by Tompkins County and the Town of Ithaca that could be bolstered in the Plan:

Complete Streets. The Plan should emphasize and prioritize the need to reduce car dependency as a critical component of reducing emissions from transportation. The City supports the Plan recommendations to promote electric vehicles and expand charging infrastructure, shifting to EVs is insufficient. We want people to drive less and choose active and shared transportation options and transit more frequently. Shifting from vehicular travel to active clean transportation modes not only reduces GHG emissions, but also have been found to effectively result in positive health outcomes like reduced risk of chronic disease and improvement of existing chronic disease; a 12% reduction in mortality; and an 11% reduction in cardiovascular disease ¹. A multimodal transportation system in which travelers are not dependent on access to a vehicle makes a community more equitable. It gets children outside and allows adults to age in place.

Following are a few specific recommendations to reduce car dependency.

- a. Increase funding for complete streets.
- b. Create funding to support electric bicycles and other micro-mobility options.
- c. Broaden the scope of projects allowed under complete streets funding to include maintenance projects.

¹ E. Bridgwater, S. Rajpurohit, and K. Kennedy. Moving America Forward: Health, Safety, and Economic Benefits of Multimodal Transportation Systems. America Is All In (2022).



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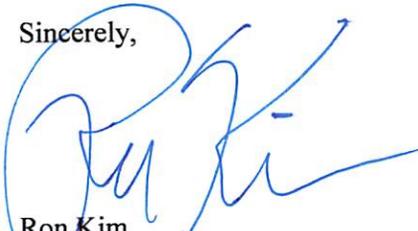
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- d. Allow flexibility for context specific solutions to roadway infrastructure and vehicle speed situations that put vulnerable road users at risk.
- e. Support pilots and expansion of public transportation programs such as CDTA's On-Demand Flex van program and CDPHP Cycle.
- f. Update antiquated NYSDOT regulations for bike infrastructure on roads, so as to conform to the most recent national standards (e.g. the AASHTO Guide for the Development of Bicycle Facilities and NACTO's Urban Bikeway Design Guide).

Urban Forestry. Among other benefits, urban trees contribute to large energy savings in cities first, by greatly reducing the need for air conditioning in the summer and second, by reducing the energy needed to process storm water. Municipalities struggle to adequately fund urban forestry and rely on volunteer efforts that are inadequately resourced. We suggest that the proposed law incentivize municipalities and developers to plant street trees and purchase and reforest land.

Thank you for the opportunity to provide comments on this Scoping Plan. We commend all involved for their dedication in creating this comprehensive, forward-thinking Plan and look forward to continued partnership with state agencies as we work towards a healthier climate and more equitable, resilient communities. We commend other municipalities for their leadership and comments submitted in response of the Climate Scoping Plan including Tompkins County, the Town of Ithaca, and the Town of Bedford.

Sincerely,



Ron Kim
Mayor of Saratoga Springs, NY

CC:
Governor Kathy Hochul
Senator Kristen E. Gillibrand
Congressman Paul Tonko
Basil Seggos, Commissioner of the NYS Department of Environmental Conservation
Doreen M. Harris, President of NYSERDA,
Rory M. Christian, Chair of the NYS Public Service Commission,
Members of the NYS Climate Action Council