



Ladies/Gentlemen,

June 15, 2022

Please find below the Town of Yates comments regarding the Climate Leadership and Community Protection Act (CLCPA) Draft Scoping Plan. Our comments apply to the following CLCPA Chapters: Chapters 1-24.

Unfortunately, the plan, as written, is founded on an unacceptably small climate dataset. As a result, the plan is fatally flawed throughout. One example is the statement indicating a statistically significant increase in disasters (previously: natural disasters):

"The World Meteorological Organization found that in the 50-year period from 1970 to 2019, the number of disasters worldwide increased by a factor of five, and economic losses due to weather, climate, and water extremes have increased sevenfold. Scientific consensus is represented by the works of notable international, national, and local scientific institutions." (Draft Scoping Plan, pg. 12).

Basing this scoping plan on a 50-year slice of the Earth's geologic and meteorologic history is unfounded statistically and highly biased. For example: The Earth has been moving out of a mini-Ice age since 1850, but the impact of this data on the last 50-year slice is not factored into the plan.<sup>1</sup>

That is, there is no assessment of the impact on warming as a result of the naturally occurring, mini-Ice age event on climate since 1850. As such, this scoping plan is not valid and needs to be discarded. Another scoping plan needs to be developed to take into account all climate factors over a much longer geologic timeframe in order to scientifically determine anthropogenic climate change impacts.

Additionally, the Town of Yates would like the following comment and the CLCPA response to this specific comment to be published in the public record:

**The NYS Office of Renewable Energy Siting (ORES) received over 5,000 comments on their Section 94-c Draft Uniform Codes and Standards (USCs) to govern all large-scale renewable energy projects in NY. ORES did not find even one of the comments substantive enough to cause them to change any USCs. Not. One.**

**The Town of Yates dares the CLCPA to individually, specifically and explicitly respond to each of the thousands of public comments they will receive, rather than cast aside all of the changes recommended by the public as, "unreasonably burdensome in view of the CLCPA targets and the environmental benefits."**

Sincerely,

Supervisor, Town of Yates  
On Behalf of the Town of Yates

<sup>1</sup> See Steven E. Koonin's *Unsettled: What Climate Science Tells Us, What It Doesn't, and Why It Matters*. April 27, 2021, Chapter 6.