

# Public Comments: Draft Scope for the New York State Energy Plan

Comments submitted by the  
**New York State Association of Counties**  
**New York Conference of Mayors**  
**New York Association of Towns**



to the

**New York State Energy Planning Board**

December 16, 2024

On behalf of the New York State Association of Counties (NYSAC), the New York Conference of Mayors (NYCOM), and the New York Association of Towns (NYAOT), thank you for the opportunity to comment on the Draft Scope for the New York State Energy Plan (the Plan) to assess meeting the state's energy needs over the next 15 years. Our feedback reflects the collective priorities and concerns of local governments and builds upon our members' extensive experience managing local climate initiatives.

### **Enhance Local Government Consideration and Participation in Plan Development**

Municipalities are at the forefront of climate adaptation and mitigation and are critical partners in achieving the Climate Leadership and Community Protection Act goals. Given our experiences in implementing and working with state programs and creating and executing local policy, local governments can provide key insights and assist the state in assessing energy needs, programs, and challenges as well as help create the most effective and efficient way forward in the transition to clean energy. While we believe the Draft Scope largely covers the essential elements of assessing energy needs and preparing for further transitions to clean energy, and we recognize that there is a section in the Draft Scope on local collaboration, we believe our knowledge and ability to impact and support climate and decarbonization goals go well beyond planning and zoning. Local governments play a role in almost every part outlined in the Draft Scope, and we encourage the state to incorporate the role local governments' play throughout the Plan. Our comments outline the many areas local governments work in related to a clean energy transition to highlight how local governments can be partners in developing myriad topics proposed in the Plan.

### **Climate Change, Adaptation, and Resiliency**

Part of the Plan is meant to, among other things, look at the impact of climate change on natural resources, infrastructure, public health, and the economy, and municipalities are well positioned to provide valuable insights. Local governments maintain approximately 85 percent of all roads in New York State, operate water and sewer systems, respond to pollution-related emergencies through local health departments, and provide first responder services during climate change related weather events. Local governments also manage critical flood mitigation and stormwater infrastructure, maintain emergency operations centers that coordinate disaster response, and directly experience the impacts of climate change on municipal infrastructure. For example, coastal communities are already implementing resilience measures to protect water treatment facilities from rising sea levels, while inland municipalities are upgrading stormwater systems to handle increasingly intense precipitation events. This "boots on the ground" experience provides invaluable insight when discussing strategies surrounding climate-change resiliency.

### **Environmental Justice and Climate Change**

Local governments have ample, valuable experience with policies and programs to promote environmental justice that can assist in evaluating ways to enhance these

efforts and move forward. Local governments directly engage with vulnerable populations and are on the frontlines of addressing inequities in Disadvantaged Communities (DACs). They work to improve air quality, enhance health outcomes, increase economic opportunity, and deliver climate benefits to underserved areas. Localities also partner with community organizations to engage residents in climate planning processes, ensuring that vulnerable populations have a voice in shaping climate solutions that directly impact their communities. This information and experience could help the plan assess existing programs and develop additional actions to take in the future.

We also urge that the Plan prioritize rural and economically distressed areas that face significant barriers to transitioning to a clean energy economy. Only 15% of rural census tracts are DACs, compared to 26% of suburban tracts and 47% of urban tracts. Rural communities face unique barriers including aging housing stock, insufficient broadband access, longer distances between services, limited access to contractors and installers, older electrical infrastructure, higher energy burden rates, and challenging building stock conditions that complicate clean energy adoption. For example, many rural homes require significant weatherization and electrical upgrades before heat pumps can be installed, creating additional cost barriers. Many rural residences rely on delivered fuels like propane or oil, making the transition to cleaner heating options more complex and potentially more expensive. Many rural areas also lack the planning capacity and technical expertise needed to develop and implement comprehensive clean energy strategies. We recommend developing specific metrics for measuring rural community progress in clean energy adoption and creating targeted support programs for these areas, including dedicated funding for rural energy planning, enhanced incentives for rural clean energy projects, and technical assistance programs specifically designed for rural municipalities. A broader assessment will help ensure an equitable distribution of resources.

### **Clean Energy Jobs, Innovation, and Economic Development**

Local governments are key players in clean energy jobs, economic development, and innovation that drive progress and thus can help develop these areas and craft a path forward in the Plan. Municipalities are, in many ways, a testing ground for new ideas that can be refined and scaled for statewide adoption. Examples include Niagara County's nation-leading extended producer responsibility (EPR) law for solar panels and Ulster County Climate Corps, which engages students and community members in advancing climate initiatives across county departments. Municipalities also collaborate with state agencies, non-profits, and private sector partners to tailor state and regional initiatives to community needs, and can help ensure the long-term viability and effectiveness of new programs.

With respect to jobs and economic development, local governments and economic development agencies are key drivers of economic growth, creating family-sustaining jobs through public investments and business attraction and retention efforts. Counties and municipalities collaborate with academic institutions, including community

colleges, and workforce development boards to train workers for jobs in emerging green industries, ensuring a skilled workforce for the clean energy economy.

We also work with private developers and businesses, local governments leverage public dollars to attract private investments in renewable energy projects, green infrastructure, and clean technology deployments. Counties and municipalities also offer incentives and support to businesses that adopt energy-efficient practices. These experiences allow us to provide practical solutions and ideas on how clean energy partners can significantly contribute to long-term economic development throughout the state.

### **Building, Transportation, and Smart Growth**

The role that local governments play with respect to clean energy transportation related issues and buildings cannot be understated. As noted earlier, not only are we responsible for the vast majority of the State's roads, but we also provide local transportation services, build alternative transportation infrastructure such as bike lanes and sidewalks, and are preparing for the electrification of municipal fleets. With respect to building, we have been responsible for code enforcement related to new development moving away from fossil fuel based systems, and are at the forefront of comprehensive planning and creating smart growth communities. We have valuable insights into the impact electric vehicles will have on our highways, the need for electronic charging stations, how the state and local governments can work together to best accommodate changing needs, and where commercial and housing development is most likely to occur over the next fifteen years.

### **Implementation Resources and Support**

To effectively partner in achieving the state's energy goals, local governments require robust and reliable resources and support. Counties and municipalities need dedicated funding streams for clean energy initiatives that allow for long-term planning and sustained program implementation. This funding should be paired with comprehensive technical assistance and training for local government staff to build internal capacity and expertise. The state should streamline processes for accessing resources and programs, reducing administrative burdens that can particularly impact smaller municipalities. It is crucial that local decision-making authority be preserved as state goals are advanced, allowing communities to tailor implementation strategies to their specific needs and circumstances. Additionally, support for data collection and program evaluation will enable communities to track progress and adjust strategies as needed, while resources for community engagement and education will ensure broad participation in clean energy initiatives. These comprehensive support systems will enable local governments to effectively implement state energy initiatives while meeting local needs and conditions.

### **Incorporate Farmland Protection into the Plan**

New York's agricultural sector is a major economic driver and plays a critical role in carbon sequestration. Protecting farmland from development pressures is essential as

solar and wind energy projects expand across the state. We strongly advocate that the Plan include an assessment and strategy to protect valuable farmland, such as incentives to install renewable energy infrastructure on non-agricultural lands like rooftops, parking lots, and brownfields. When agricultural land is used for renewable energy, dual-use strategies like agrivoltaics should be explored to maintain agricultural production alongside energy generation. The state should create technical assistance programs and financial incentives to help farmers integrate renewable energy while maintaining viable agricultural operations. This could include grants for agrivoltaic system design, crop selection guidance for solar co-location, and support for adapting farming practices around renewable infrastructure. State funding should also support municipalities in creating agricultural preservation plans that identify priority farming areas and establish clear standards for renewable energy development on agricultural lands

## **Conclusion**

Thank you for the opportunity to provide feedback on the Draft Scope for the New York Energy Plan. We are committed to partnering with the state to achieve our shared climate and energy goals. To ensure success, we recommend:

- Incorporating local government expertise and experience throughout all aspects of the Plan, not just in planning and zoning;
- Safeguarding drinking water sources through sustainable and resilient land use practices that ensures renewable energy development does not compromise water quality or availability;
- Ensuring adequate resources and technical assistance are provided to local governments for implementation;
- Protecting valuable farmland while advancing renewable energy development;
- Prioritizing the needs of rural and/or economically distressed communities;
- Leveraging local workforce development programs and economic development initiatives; and
- Supporting local infrastructure adaptation and resilience efforts.

While the climate crisis demands action at all levels of government, it will be won or lost at the local level. Local governments are essential partners in achieving New York's ambitious climate and energy goals. Our members bring valuable on-the-ground experience, strong community connections, and proven track records of innovation. We look forward to continued collaboration with the state to create an effective and equitable energy transition that benefits all New Yorkers.