



New York State Association of Town Superintendents of Highways, Inc.

June 29, 2022

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

scopingplan@nyserda.ny.gov

Dear President/CEO Harris and Commissioner Seggos:

I write to you today on behalf of the New York State Association of Town Superintendents of Highways (NYSAOTSOH) with our concerns with the Climate Action Council's Draft Scoping Plan under the Climate Leadership and Community Protection Act.

Regardless of the merits of the Draft Scoping Plan's goals, NYSAOTSOH is very concerned about the many unknowns associated with the plan, such as:

- the costs associated with the conversion of all new light-duty cars and trucks to zero emissions vehicles in just eight years,
- the costs of zero emission heavy-duty vehicles such as snow plows which keep our driving public safe,
- the costs of adapting our thousands of highway facilities to new energy systems,
- the reliability and costs of all of the infrastructure associated to these new zero emission charging systems, and
- the impact of heavier battery powered vehicles and equipment on our physical transportation infrastructure.

Our 1,100-plus members keep over 60 percent of New York's highways along with thousands of culverts and bridges safe for New Yorkers in 933 towns throughout the State. To maintain this massive system our members' combined fleet consist of hundreds of thousands of on-road vehicles and off-road equipment.

Recent legislation established a goal for all new light duty vehicles and non-road vehicles sold in the State to be zero-emission by 2035 and all new medium-duty and heavy-duty vehicles to be zero-emission by 2045. Converting to an electric fleet will be a costly proposition. How costly? We don't know, because a full life-cycle cost analysis was never conducted. Moreover, the Draft Scoping Plan doesn't divulge where the funding for this new fleet would come from. As it stands, this is an unfunded mandate.

We are further concerned about the reliability of this proposed new, untested electric fleet. Electric plow trucks do not currently exist. Extreme weather events, which we are experiencing more and more frequently, drive up costs and put a heavy demand on our fleet and equipment.

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Additionally, there should be a realistic acknowledgement of the useful life of our current fleets. When taken care of properly our diesel equipment and vehicles can be maintained for decades. Municipalities are accountable to our taxpayers – for this valuable equipment to be deemed obsolete before its useful life is over is not fiscally responsible.

According to a report issued by New York State Comptroller Thomas DiNapoli on January 28, 2022 titled *Locally Owned Roads by the Numbers*, local governments, excluding New York City, spent \$2 billion on road maintenance and improvements in the 2020 fiscal year. The report highlighted a 2013 study of local highway and bridge needs published by our Association, based in part on a 2007 “Transportation Needs Assessment” by NYSDOT, which found that municipalities would need about \$32 billion over 15 years to restore locally owned roads through repaving and improvements. The report estimated that there was a spending gap of \$1.3 billion a year for locally owned roads and bridges. In 2017, our Association updated that needs estimate to \$1.7 billion annually.

These huge funding gaps on the local system don’t take into consideration the significant construction material cost increases. According to the Federal Bureau of Labor Statistics, Producer Price Indexes from April 2020 to 2022 show construction bid prices have increased drastically (Steel Mill Products 107%, Lumber and Plywood 89%, Truck Transportation of Freight 41%, Gypsum Products 32%). That is not considering the cost spikes in fuel or for the construction machinery and equipment itself.

As our members can attest, we face a supply chain crisis now, despite our long-standing relationships with suppliers and vendors. As a result of current constraints it already takes two-years from order to delivery for a heavy duty diesel truck. An all-electric fleet mandate will force us into new supplier and vendor relationships, and we are left with no information as to where parts and supplies will be built or shipped from. This will, in all likelihood, exacerbate our supply chain crisis.

Simply put, we cannot support the Draft Scoping Plan without a thorough cost analysis since we already cannot maintain our local transportation system despite all of our best efforts. The Climate Action Council has many laudable goals. But this Draft Scoping Plan is rushed, incomplete, and unfunded. We urge you to reject it.

Thank you for your consideration.

Sincerely,



Richard Benjamin, Jr.
2022 NYSAOTSOH President
Town of Thompson, Sullivan County