**Sustainable Bethel**

**c/o 3454 State Rte 55**

**White Lake, NY 12786**

Thank you for this opportunity to provide comments on the NYS Draft Scoping Plan. This report is stunning in its ambition and scope. It is a detailed roadmap for navigating the global climate crisis and demonstrates New York’s commitment to leadership on this issue. It lays out in stark detail exactly what we are facing and how aggressively transitioning to a lower emissions economy will benefit all New Yorkers. Of particular importance is the focus on social justice, pledging as it does to ensure allocation of at least 35%, and preferably 40%, of clean energy and efficiency funding to assist marginalized people who are the most affected by this crisis. We strongly support the Draft Scoping Plan and applaud the time, effort, ambition and vision of the various working groups which contributed to it so as to achieve the goals of New York State’s ambitious Climate Leadership and Community Protection Act (“CLCPA”).

Sustainable Bethel is the advisory sustainability committee of the Town of Bethel in Sullivan County. The Committee, comprised of Town Board members and community volunteers, has been working since 2013 to promote and support environmental sustainability measures. Our Town was recognized as a Bronze-certified Climate Smart Community in 2018 and is a designated Mid-Hudson NYSERDA Clean Energy Community. We have worked hard to reduce our carbon footprint (our capped landfill-sited community solar array should go operational this fall) but have also unsuccessfully fought new fossil fuel infrastructure (the newly constructed compressor station on the Bethel-Town of Highland border).

Bethel has approximately 4000 residents and its small municipal staff totaling 21 means that it has no “office of sustainability” or dedicated sustainability personnel. Often, the State’s sustainability programs overlook issues that particularly impact small rural municipalities. As such, we urge and recommend, generally, that the Draft Scoping Plan recognize the differences in needs-- and needed solutions --among rural, suburban and urban communities and, wherever possible, specify approaches that may be targeted to the State’s hundreds of smaller, rural municipalities. For the Town of Bethel, the “will” is there but the implementation of sustainability initiatives continues to be significantly dependent on the availability of State funding and technical support.

Below are our comments on specific strategy proposals in the Draft Scoping Plan regarding the strategies focusing on **Electricity (Chapter 13):**

1. **First and of the highest priority must be the denial by the State of any new gas infrastructure permits** to avoid increases in GHG emissions and the creation of more stranded assets.
2. **Phase out fossil fuels in electricity generation by 2040.**

Many of New York's fossil fuel plants are already at retirement age. We support the process laid out in the Draft Scoping Plan for regulations that ensure a continual decline in GHG emissions from power plants, reaching **zero** by 2040. The Final Scoping Plan must also:

* Prioritize retirement of fossil fuel-fired plants whose emissions disproportionately harm disadvantaged communities, consistent with the CLCPA.
* Ensure protections for all communities facing plant closures, including:
	+ Training and supportive services for displaced workers, beginning well before plant retirement, to enable a smooth job transition.
	+ Sufficient funding of the Electric Generation Facility Cessation Mitigation Program to reduce the local property tax impacts of plant closure on municipalities and school districts.
	+ Plant-owner responsibility for the costs of site remediation.
* Encourage re-use of power plant sites for battery storage. This would not only support the clean energy transition but would also help to mitigate the revenue and jobs impacts of plant closure.
1. **Accelerate renewable energy development to reach the CLCPA's near-term target of generating 70% of electricity from renewable resources by 2030.**
* Direct the NYS Office of Renewable Siting to set annual goals for megawatts of renewable resources to be permitted each year through 2030.
* Incentivize "agrivoltaics," or the integration of solar with agricultural production on the same land, and direct NYSERDA and the Department of Agriculture and Markets to produce educational materials and guidance for farmers, renewable energy developers, local governments, and other stakeholders. Agriculture and renewable energy can be complementary and mutually-supporting land uses, and agrivoltaics has great potential to minimize land-use conflicts and strengthen community support for renewable siting.
1. **Support high-value renewable projects that contribute to equity, resilience, and smart land use.**
* Prioritize pairing of solar with electrification in low-income housing, and expanded opportunities for low-income participation in community renewable energy.
* Educate municipal government officials regarding, and increase incentives to encourage, solar projects on rooftops, over parking lots and on brownfields and capped landfills to be paired with battery storage.
* Require utilities to expand the capacity of the local grid to interconnect with solar (i.e., "hosting capacity"), taking into account any priority locations for solar identified by local governments as well as optimal siting areas, like brownfields and capped landfills. (Important note: The Town of Bethel had to significantly reduce the potential size of its capped landfill community solar installation due to the capacity of the local grid.)
* Direct utilities to speed up the pace of processing interconnection applications so that investments can be made in a timely manner.
1. **Provide communities with the support they need to partner in the renewable energy transition.**
* Provide resources and assistance to local governments to streamline permitting and zoning for renewable energy.
* Develop a Clean Energy Development Mapping Tool for local governments to help them plan/site renewables.
* Encourage Community Choice Aggregation (CCA) programs to 1) support 100% renewable energy for supply, 2) integrate community renewable energy and other local energy programs, 3) include programs for low-income customers, and 4) engage in robust public energy education. Authorize counties, and not just villages and towns, to form CCAs.
* Expand benefits to communities hosting large-scale renewable projects, and tailor those benefits to community needs and priorities.
1. **Ramp up battery storage development and demand-side solutions to reduce peak demand and enhance grid reliability.**

Support Scoping Plan recommendations to:

* Expand the Clean Energy Standard to include battery storage (or create a separate Storage Standard), requiring utilities and energy suppliers to procure increasing amounts of battery storage over time as the grid becomes more reliant on solar and wind.
* Promote clean-energy solutions to reduce peak demand and maintain grid reliability, including geothermal heating and cooling and demand response programs.

**7. Prioritize climate education and awareness-raising about the benefits of renewable energy.** Successful implementation of the Climate Act depends upon public support and engagement to meet climate goals. It also depends on inspiring young people to pursue clean energy careers and create the workforce needed to transform New York's economy. The Final Scoping Plan should:

* Direct NYSERDA to support a well-funded statewide public information/education campaign, utilizing all forms of media. Engage partners in direct outreach, including Clean Energy Hubs, educational and community-based partners.
* Direct the State Education Department to develop climate change curricula & clean energy jobs training and opportunities in K-12 schools and community colleges.

 **8. Develop the workforce for the clean energy transition.**

* Engage the NYS Education Department, SUNY/CUNY system, labor, community-based organizations, and workforce development and private sector partners to develop and implement a strategy to recruit, train, and skill up the clean energy workforce required to shift to a zero-carbon electricity system.
* Create a State Office of Just Transition to ensure a coordinated, proactive approach to addressing issues related to economic development, job quality, socio-economic impacts, job loss, worker displacement, and job-readiness requirements for employment opportunities in emerging industries.
* Ensure that strong labor standards and protections exist across all clean energy sectors.

Thank you for the opportunity to comment on the NYS Draft Scoping Plan.

Sincerely,

**Karen London, Co-Chair**

Sustainable Bethel