**Sustainable Bethel**

**c/o 3454 State Rte 55**

**White Lake, NY 12786**

On behalf of Sustainable Bethel, 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. 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 dependent on the availability of State funding and technical support.

Below are our comments on specific strategy proposals in the **Land Use** and **Local Government** Chapters of the Draft Scoping Plan:

**Land Use**

The Land Use and Local Government sector put forth strategies that are substantive, well-developed and aligned with the advisory panel recommendations. In New York, there are more than 28 million acres of natural and working land. Land use directly affects the state’s carbon emissions, sequestration, and storage. Leadership and decisions of local governments play a key role in determining how successful we are in achieving the goals of the CLCPA.

Sustainable Bethel fully supports the Land Use section’s emphasis on “smart growth” local planning needed to balance the protection and restoration of natural and working land, development and clean energy siting.

LU1:

* Establish programs to support local land acquisition: DEC should considerably enhance support for local land acquisition and conservation easements by municipalities and land trusts through mechanisms such as the Community Preservation Act, Conservation Partnership Program (CPP), Forest Conservation Easements for Land Trusts and Community Forest programs.
* Maintain and increase State land acquisition: DEC should continue to maintain and significantly increase land acquisition (fee and conservation easement) by State, municipalities, and land trusts. (page 277)

Comment: As a municipality in the Catskill Mountains, we are strongly supportive of efforts to preserve forests as forests, and the specified components of that strategy listed in LU1. The preservation of existing forests offers an immediate “carbon sink” that cannot afford to be diminished. The draft notes that 73% of New York’s forests are owned by private landowners. We would urge a further strengthening of the above-listed strategies to provide for a limited time “first right of refusal” to the State or local municipality to purchase when privately-owned forested acreage above a specified acreage minimum is offered for sale and the land is acquired for conservation. Equally critical is that interested municipalities be provided the financial support to acquire the land or secure conservation easements in an expeditious manner. This would strengthen the part of the “Keep Forests as Forests” law specified in the draft Scoping Plan.

LU1 should also include continued State attention and financial support for protecting the State’s forested areas from invasive species and common forest diseases that threaten the health of our forests.

Comment: In addition to the excellent strategies set forth in LUE3 (page 282) to avoid agricultural and forested land conversion, we urge that the DEC be mandated to incorporate and prioritize avoidance of agricultural and forest destruction and segmentation when evaluating all requested permits for gas pipelines, compressor stations and related infrastructure.

LU5. Mapping, Research, Planning, and Assistance This enabling strategy focuses on maintaining and enhancing the carbon sequestration potential of natural areas in New York, including wetlands, coastal habitats, forests, and grasslands, through improved mapping (both regulatory and non-regulatory), research, conservation planning guidance, stewardship, and assistance for local governments and landowners. (Page 286)

Comment: As a small rural municipality, we strongly support the strategies in LU5, particularly the development of a State-wide conservation framework and assistance in the creation of model land-use policies. Small municipalities without dedicated sustainability staff are heavily reliant on State guidance in identifying and adopting climate sustainable policies and laws. The creation of conservation incentives to targeted landowners is critical, as noted. These incentives should be paired with legislation that enables municipalities to have a first right of refusal to purchase high priority land that private owners nevertheless wish to sell and that the local municipality wishes to conserve.

LU7. Increase Forest and Farmland Protection in Municipal Comprehensive Plans This strategy proposes creation of tools to help municipalities identify and fund inventories of forest and farmland, development of BMPs, and a requirement to include forestland and farmland in planning efforts, which will help communities target lands for conservation and prevent emissions from land use conversion. (Pages 290-291)

Comment: As a small rural community, the Town of Bethel lacks the personnel, expertise and financial means—but not the desire or will—to adequately protect its forests, water and other natural resources. The Town needs to update its over decade-old comprehensive plan but lacks a natural resource inventory. We aim to include forest and agricultural land protection and would benefit enormously from the development of BMPs for the inclusion of forestland protection in our municipal comprehensive plan, including strategies and best practices for land conservation, and identifying priority areas for conservation.

LU8. Provide Guidance and Support on Clean Energy Siting to Localities (pages 291-292)

Comment: Based on our Town’s own experience, we would also raise awareness of brownfields and capped landfills as potential sites for renewable energy installations that utilize otherwise unusable land and typically provide lease revenue to the hosting municipality. In addition, municipalities would benefit from model zoning statutes for clean energy siting that incorporate protections for forested and agricultural lands and help encourage and direct renewable energy projects to appropriate acreage/zoning.

LU10. Direct Planning, Zoning, and Pre-Development Assistance to Municipalities

Comment: We strongly support the strategies outlined on pages 296-297. The Town of Bethel has been heavily reliant and most grateful for the guidance and counsel of the DEC and NYSERDA regional coordinators whom have assisted Sustainable Bethel in many of our environmental initiatives. Our NYSERDA regional coordinator has been exceptional but, clearly, there is a need for a growing arsenal of such professionals to assist NY municipalities.

There must also be strong coordination among State agencies when providing model policies and laws. After adopting NYSERDA’s model NYStretch Energy Code in the form provided, the Town had to subsequently amend it to address DOS requirements.

The proposed Sustainable Development/Climate Act Resource Guidebook and consolidated data portals to enable “one-stop” tools (pages 296-297) would be hugely helpful.

**Local Government (Chapter 20)**

“Many local governments, especially small, resource-constrained communities, struggle with tight budgets and limited staff capacity, which limits their ability to take local climate actions. State programs, like Clean Energy Communities and Climate Smart Communities, that offer clear guidance, grants, technical assistance, and recognition can motivate communities to take local climate action and demonstrate climate leadership with a focus on equity.”

Comment: As we have noted previously, the Town of Bethel is a perfect example of a small, rural, resource-constrained community with a tight budget and limited staff capacity but with a strong interest in advancing sustainability measures. It achieved CSC Bronze certification status (the 20th municipality in the State to do so) and been awarded $20,000 under NYSERDA Clean Energy Communities program, due to the strong support of its Town Board and Supervisor but also the years-long commitment of Sustainable Bethel community volunteers. As such, its efforts would have been impossible without the CEC and CSC programs cited above. Particularly critical is the ongoing support of regional coordinators who work closely with our Town and Sustainable Bethel committee.

We are strongly supportive of the strategies identified in the Local Government chapter.

***Karen London, Co-Chair***

Sustainable Bethel