



Comments submitted by Otsego 2000, Inc. on the Climate Action Council's Draft Scoping Plan, Regarding Climate Justice and Rural Communities (Chapters 6, 7, and 20).

June 30, 2022

Otsego 2000 recognizes the imminent need to address the effects of climate change and supports a thoughtful transition away from fossil fuel-based energy generating sources toward cleaner, renewable sources. Otsego 2000 supports the thoughtful siting of renewable energy systems which avoids:

- Sensitive ecosystems;
- Prime farmland and farmland of statewide significance;
- Excessive clearing of trees and habitat fragmentation; and
- The degradation of scenic vistas and areas of cultural and/or historical significance.

Otsego 2000 supports locating renewable energy systems on:

- Previously disturbed sites such as large box store parking lots and landfills
- Brownfields or other sites with substantial development constraints
- Decommissioned agricultural land

The mechanism to site large-scale renewable energy systems in New York under Section 94-c of New York State's Executive Law, however, creates a review process which is inequitable to rural communities throughout the state. Otsego 2000 has substantial concerns related to environmental justice impacts to rural communities that could result from the siting of large-scale renewable energy systems in Otsego County and beyond.

For decades, the small rural communities of upstate New York have suffered a steady decline in virtually all measures of population, including per capita income, education, and housing, to name but a few. Upstate rural New York has lagged far behind the rest of the State in several economic metrics. In addition, due to declining population, local governments have been reduced to managing only the essentials of governance. The shrinking tax base has reduced the ability of villages and towns across rural New York State to adequately fund offices that might provide better service to residents. A further concern is the pattern of under-investment in rural infrastructure, which undermines quality of life, thus discouraging in-migration and investment in new businesses, and depressing income. For these reasons, and the additional reasons listed below it is imperative that the Climate Justice Working Group include small rural communities among its list of eligible entities.

- Rural communities lack the capacity to participate as even partners in the transition to a clean energy economy

- Rural communities generally do not have access to geospatial technology, engineering, legal, and planning services to help plan for and site large-scale energy infrastructure systems
- The consolidation of the dairy industry among other agricultural sectors places significant burdens on local economies to adapt to changing market conditions
- Rural communities with resource-based economies will need assistance in adapting to the effects of climate change

Addressing climate change at the state level will require the collective effort of residents throughout our great state. To create a truly equitable transition to a clean energy economy, rural stakeholders desperately need the technical assistance necessary to participate meaningfully in state-level rulemaking processes.

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