**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.

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 the strategies discussed in the **Transportation** chapter (chapter 11) in the Draft Scoping Plan:

***Transportation (Chapter 11)***

Our Committee strongly supports the goal of implementing an aggressive transition to ZEVs, aiming for 100% ZEV sales for LEVs by 2030, 50% ZEV sales of medium-duty vehicles by 2030 and 80% ZEV sales of heavy-duty vehicles by 2035.

We do note that most of the recommendations in the Draft Scoping Plan address urban and/or suburban communities. We would urge that a working group be tasked to create a feasibility plan for rural communities. Issues could include:

* Providing detailed recommendations for farm equipment and identifying funding sources that farmers can take advantage of.
* How can a detailed comprehensive plan for a rural community consider public transportation options?
* How do you attract businesses to a rural community in order to reduce vehicle miles driven?
* What infrastructure changes does a rural community need to make in order to fit into a public transportation system?
* What can small rural communities do to create incentives for hydrogen fuel stations to be built within their community?
* What are the identified renewable fuels or green hydrogen fuels available for use by small rural community highway departments which have, primarily, only heavy-duty vehicles in its fleet?

The State should also take into consideration that mileage-based user fees and vehicle registration fees may disadvantage rural communities which have more limited ability to implement the recommendations discussed in the Draft Scoping Plan.

Below are some additional comments to specific sections of the Transportation chapter:

***Provide Enhanced ZEV Purchase Incentives***

Comment: In rural communities such as our own, there is very limited public transportation and residents are dependent on their privately owned vehicles. Food shopping, healthcare facilities and other routine errands may involve a 20 minute or more drive. As such, the transition to ZEVs will be an essential, albeit challenging one, in terms of ZEV prices and the availability of charging infrastructure. Federal tax credits, requiring upfront payment of the vehicle purchase price, although significant in amount, have not been a viable incentive for lower and medium income buyers who cannot wait or are ineligible for a tax credit. NYS should increase the amount of the State incentive on ZEVs so as to immediately reduce ZEV purchase prices.

We are strongly supportive of legislation enacting a “feebate” program.

***Enhance ZEV Awareness and Reduce Sales Barriers***

Comment: Many car buyers are simply unaware of the advantages of ZEV vehicles (acceleration speed; minimal servicing requirements, etc.) and few manufacturers have not promoted ZEV models. Public service announcements touting the positives of ZEV vehicles might go a long way to changing perceptions. As a municipality, we have experienced hesitancy on the part of our constables to transitioning to ZEVs.

***Invest in and remove barriers for ZEV charging and fueling infrastructure:***

Comment: Incentives for the installation of fast charging station clusters in shopping centers and private and municipal parking lots (as well as travel corridors) will be needed, to encourage the ownership of EVs among residents without home charging access/opportunity.

***Lower Carbon Renewable Fuels***

Strategy: The strategies described above will reduce the State’s reliance on fossil fuels for transportation as expeditiously as possible. For harder to electrify vehicles and equipment, the scenarios identified for meeting the Climate Act GHG emission reduction requirements rely, in part, on the increased use of lower carbon renewable fuels, including renewable diesel, renewable jet fuel, and/or green hydrogen.

Comment: The heavy-duty vehicles in rural communities’ Highway Departments are not currently amenable to replacement with ZEVs. (82% of the Town of Bethel’s Highway Department vehicles are heavy duty vehicles.) Is there a cost-effective way to convert diesel vehicles to green hydrogen vehicles? Is that fuel readily available?

Thank you for the opportunity to comment on the Draft Scoping Plan’s Transportation chapter.

***Jeffrey Allison***

Co-Chair,

Sustainable Bethel