From: James Waters
To: erda.sm.scopingplan
Subject: Draft Scoping Plan Comments - BUILDING
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Re: Draft Scoping Plan Comments - BUILDING

Dear New York State Energy & Research Development Authority Committee,

The NYS Climate Action Council's draft Scoping Plan fails to acknowledge the value of embodied carbon in natural building material supplies. The FIRST true "GREEN" options in New York State will inevitably come from the Forest Products Industry. But, those making the decisions about the "green" future of our state are routinely omitting the original GREEN….the Forests! Ensuring the plans and regulations for our future include wood as a preferred building materials will assist our State in achieving climate change goals. There are things to consider before this Scoping Plan is codified:

All-Electric Buildings – proposals within the draft Scoping Plan and bills before the New York Legislature for Advanced Building and Energy Codes and the All-Electric Buildings Act would require all new construction and substantial modifications of existing buildings to be fully electric and free of any greenhouse gas emissions. That means no wood stoves, no modern wood heat furnaces and no gas cooking stoves, beginning as early as 2024. The estimated requirements for electrifying an average home would be somewhere between $25, 000 and $60,000. Presently, there is no exception for renewable wood heat and use of wood residuals in our sectors manufacturing processes.

Embodied carbon – the sum of total carbon emitted during a product's lifecycle – is an important measurement for construction materials like concrete and steel, and for building products like insulation. Embodied carbon consists of all the GHG emissions associated with building construction, including those that arise from extracting, transporting, manufacturing, and installing building materials on site, as well as the operational and end-of-life emissions associated with those materials. These carbon savings are realized when use of the insulating material results in building-energy savings that offsets the embodied carbon of the material itself. Wood provides the highest rates of carbon offsets of all building materials. The use of wood to reduce embodied carbon in buildings was completely overlooked in the Buildings chapter of the draft Scoping Plan.

As a member of the Empire State Forest Products Association (ESFPA) which represents over 350 businesses across New York State - it is imperative that the forests are considered when finalizing the draft scoping plan. New York's forests and wood products are the single largest natural solution to climate change, and we are proud to be leaders in forest management and making products from carbon sequestering trees.

It is important to keep in mind when developing a plan about the environment to keep the environment in mind and all the benefits it offers already, naturally. Any plan to enhance the environment must not harm the industry which keeps that environment healthy. The forests, wood products as additional carbon storage and substitution benefits for other fossil fuel

derived products, the role of markets in keeping the forests as forests, the sensitivity of wood products leakage, forests as a low carbon energy resource, and the overall costs of this draft Scoping Plan must be considered.

If the goals of the CAC's Draft Scoping Plan is to improve the environment and have a positive impact on climate change – it makes sense to include the people that have been doing it for generations already, the Forest Products Industry.

The draft scoping plan must cite wood as the preferred building material and a renewable energy resource for heat in both buildings and our industrial sector.

Sincerely,
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