From: Seth Carr
To: erda.sm.scopingplan
Subject: Draft Scoping Plan Comments - LAND USE
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Re: Draft Scoping Plan Comments - LAND USE

Dear New York State Energy & Research Development Authority Committee,

The link between land use and the climate is complex. Changes in land use can impact the natural benefits of land which is currently being used sustainably for the benefit of society needs. While providing benefits of products, open space, recreation, clean water, clean air and carbon sequestration, working forests help to reverse the impacts of climate change. While policies to improve our climate are driven by lawmakers and those individuals appointed to public service, it is important to keep in mind the majority of open space is owned and worked by private landowners – predominantly small family farms and woodlots. Any climate plan must be cognizant of property rights. The current Climate Action Council (CAC) draft Scoping Plan is not. We ask the CAC to view private landowners as partners who can and will work with policy makers when decisions are based on science and facts.

Additionally, the current draft Scoping Plan is focused heavily on preservation, not conservation. Perhaps many unfamiliar with land use are not acquainted with the two terms, perhaps people even feel they are interchangeable. They are not. This fine detail between the two in the case of the CAC draft Scoping Plan is the disregard of private property rights as well as responsible use of the land. The current draft Scoping Plan choses policy which promotes the "preservation" of lands – which is the protection of resources and keeping them in their natural state. Conservation is using the resources while maintaining the resources – the very definition of sustainable forestry. Conservation provides all the natural climate solutions. Ignoring the needs of society from the forests only shifts the use of lands from New York to other states or countries who do not hold their forestry practices to the high standards of our Industry in New York. Then, are we creating policy to bring about any climate benefit? The answer is no.

Policy must acknowledge land use pressures as land use change is an important driver of climate change. For example, when pressured by unrealistic demands on their private property, farmers might shift from their customary crops to crops that will have higher economic return which will impact climatic conditions. Forest owners, when pressured, could be forced to split their property in parcels, selling off sections which are now open to development. The understanding of the interactions between climate and land use change is improving but continued scientific investigation is needed.

The land use recommendations of the draft Scoping Plan also paint a picture of idyllic urban life around transportation hubs and higher density more urban environments which is naïve when it comes to New York's rural economies based on farms, forests and open spaces that support working lands and tourism destinations. Rural upstate New York is more than just convenient sites for renewable energy projects and transmission corridors. It's a region where millions of New Yorkers choose to live and raise their families and work in economic sectors

supported by our natural resources. It's a region that is dominated by private landowners who are responsibly stewarding their lands and policy makers should recognize and value the conservation, climate and economic benefits they bring to all New Yorkers. It's more than preservation, it's a viable way of life and supports food, fiber and timber along with recreation and tourism and manufacturing associated to our working lands.

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.

Sincerely,
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