From: Esther Crow
To: erda.sm.scopingplan
Subject: Submit a Public Comment on NY"s Draft Scoping Plan
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Biomass originates from the raw feedstock of biofuels, which are primarily woody matter burned directly for energy instead of being processed into liquid fuels. This can include agricultural residues like straw, bagasse, pulp, animal waste, forest remnants, solid waste, and sewage. However, biomass holds the ability to produce biogas with the application of heat at low oxygen levels ("thermal gasification"). Biomass as a substitute for fossil fuels is often considered renewable energy in the context of technologies that enable the reuse of biomass and waste streams into reduced-emissions fuels for cars, trucks, jets and ships, bioproducts, and renewable power. However, biomass as energy is not carbon neutral. Instead, it is disruptive to carbon neutrality. Carbon recycling from the atmosphere via the regrowth of trees takes decades, and wood-burning adds to emissions increases and a rise in local pollution. Burning organic material like wood for fuel would pose similar problems.

The concern is simple: burning wood and other organic products adds to GHG emissions and adds to collective emissions. Net contribution poses potentially irreversible impacts as it takes away or cuts down the same resources that reabsorb emissions. The CLCPA already excludes biofuel as a source in carbon offset programs and under Clean Energy Standards [Tier 1]; it must be expressly stated in the final scoping plan that further steps must be enacted to stop incentivizing the burning of forests in the name of renewable energy. Biomass as a substitute for fossil fuels is more carbon-intensive than petroleum due to upstream emissions. Trees can be regrown to pull CO2 from the atmosphere, but it takes a century for CO2 emissions from burned wood to be reabsorbed in a growing forest. And burning wood to generate electricity releases more carbon dioxide than fossil fuels to produce the same amount of energy. Harvesting biomass impedes carbon sequestration and weakens the ability of the forest to sequester carbon. (NY state forests store more carbon than any other land use in the state.) Finally, harvesting biomass as a substitute for fossil fuels can lead to soil degradation, flooding, and landslides due to land-use change.

The final scoping plan, particularly as it relates to the agriculture and forestry section, must address the fundamental benefits of leaving forests intact and carefully account for continued carbon sequestration in any proposals that suggest harvesting as a climate mitigation strategy. As expressed by the Climate Justice Working Group, the concerns around combustion and emissions release must not go unheard. Further, the final scoping plan must remove AF20 as a strategy for New York's bioeconomy because it calls for an expansion of biomass and bioenergy (feedstocks and bioenergy products).

Sincerely,

Esther Crow