From: Sid harring
To: erda.sm.scopingplan
Subject: Draft Scoping Plan - Ag & Forestry Comments
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Re: Draft Scoping Plan - Ag & Forestry Comments

Dear New York State Energy & Research Development Authority,

The Agriculture and Forestry chapter of the Climate Action Council Draft Scoping Plan needs to more boldly recognize the New York State private forest owner and the benefits of a healthy, working forest in the fight against climate change. The Draft Scoping Plan does not recognize the significant infringement on private landowner rights nor how integral the forest is in this effort.

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.

AGRICULTURE AND FORESTRY: The first and primary issue to keep in mind is that most of the open space in New York is privately owned. 75% of all the forests (and 100% of the farmland) in New York is owned privately, the majority of which are small, family-owned lots - who provide the co-benefits of clean air, clean water, biodiversity and recreational opportunities. These neighbors and friends of yours and mine have private property rights and expectations on a return on investment on the lands they steward. If we expect our forests and farms to deliver the climate benefits as well as feed and provide valuable wood products to our residents and the world, we owe them some recognition and appreciation for what they bring to natural and affordable solutions to climate change.

Sustainable forest management requires using all parts of the tree. Low grade biomass and manufacturing residuals provide an excellent stock for low carbon energy resources and minimize forest decay and using landfills. To take the best and leave the rest results in management known as high grading that is neither sustainable nor healthy for forest regeneration.

Not only do we need to recognize these markets for their products and economic benefits, but also the role that private markets play in inducing sustainable forest management and keeping

our forests as forests.

We also need to recognize the level of outreach, education, and technical assistance to forest landowners that will be necessary in advancing forest management on these private forest lands. Like Agriculture Environmental Management, we need a Forest Environmental Management effort that can bring the public and private sector experts to forest landowners to bring about the additionality we need to achieve the CLCPA goal of net zero emissions" by 2050. This will take significant funding and incentives to leverage the landowner participation that is necessary and at landscape scale. The level of funding and types of incentives to date in a small fraction of what will be necessary.

Sincerely,
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