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Subject: Public Comment on NY"s Draft Scoping Plan: Buildings Sector
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Thank you for this opportunity to provide comments on the draft scoping plan. As required by New York's nation-leading climate law, the CLCPA, climate and environmental justice must be the driver of the outcomes of this scoping plan. To achieve this, please ensure that the following recommendations on the Agriculture and Forestry Sector are included in the final draft:

The Agriculture and Forestry Section of the Draft Scoping Plan is inconsistent. It provides excellent recommendations for preserving forest lands and transforming the way we farm in New York. However, there are copious references and ill-suited recommendations that work against the mandates of the CLCPA and recommendations of the Climate Justice Working Group (CJWG), including establishing carbon markets and building the market for bioenergy and biofuels.

This section does not go far enough to address systemic racism and to provide public investments in land access and the resources for communities who have been historically underserved and underrepresented. It must provide significant public investments in land access and resources for members of BIPOC-, women-led, LGBTQIA+, low-income, veteran, and new farmer communities, including undocumented farmworkers across New York State. The section lacks forward thinking strategies to incentivize farmers and landowners to transition to organic, agro-ecological, and regenerative systems that reduce on-farm emissions and build healthy soils which both sequester carbon and are fundamental to resilient local food systems. Instead, the plan's current articulation opens the door for both offsets and carbon trading programs that are antithetical to the emissions reduction mandates of the climate law and against the recommendations of the CJWG who explicitly called for reduced market based approaches to emissions reduction.

It is imperative that the final version of the scoping plan focus on:

1) increasing efforts to raise public investment in land access and resources for historically underserved and underrepresented communities. Climate justice and racial justice are inherently interconnected.

2) soil regeneration, and increasing outreach and education efforts to both farmers and private landowners of forest land. Measures must be taken by the state to provide a base income to land managers who regenerate soil while producing food, fiber, building materials, and medicine. Progressive soil health policy is reflective of a radical shift in societal priorities—a transformation of our collective value system that shifts us to an ecological economy and a culture of soil care where healthy soil is recognized as "basic infrastructure."

3) prioritizing afforestation and forest preservation efforts that provide maximum climate benefit over strategies designed to profit the forestry industry.

4) ensuring that forest and farming land management projects using public funds employ soil health practices maximize climate benefits, improve equity, ensure accountability, and reduce pesticide use. Projects that receive public funding should release publicly available plans on how they will achieve these goals.

5) ceasing public investments in technologies that enable the accelerating concentration of livestock farms. We must place fees on nitrogen fertilizers to fund farms transitioning to organic systems that reduce upstream methane emissions. Methane emissions from pastured cows generate less than 2% of the amount of methane that anaerobic liquid manure produces, and "dry," aerobically managed manure only generates about 7% as much methane as anaerobic liquid manure. The scoping plan should include regulatory options, as authorized under the ECL and consistent with the CLCPA, for reducing methane emissions.

Finally, the CAC should consider splitting this section in two and dedicating separate discussions for Agriculture and Forestry to allow for a deeper analysis and set of recommendations.

REGARDING PUBLIC HEALTH

Public health in New York State is enhanced by the presence of ecologically managed forests and organic, regenerative agro-ecological farms. Volumes of research confirms the perceptions of ordinary people that greenery, gardens, trees, access to parks, forests and wildlife enhance mental health as well as air quality. As blood tests confirm, the industrialization of agriculture in NYS has imposed a toxic burden on residents through heavy use of chemical pesticides, herbicides and synthetic fertilizers, and the rising level of GHG emissions, including NO2, methane and ammonia, due to the expansion of a small number of ever-larger CAFOs (under 250) and the use of herbicides like glyphosate and atrazine on millions of acres. While direct causality is difficult to establish, the rise in chronic diseases and respiratory ailments correlates with the shift in agricultural practices to ever-greater dependence on toxic materials that are minimally regulated by state and federal agencies.

Soil erosion and chemical run-off contaminate the water of rivers and lakes, resulting in algal blooms that reduce recreational enjoyment of these natural resources. The public is also burdened by the excessive costs of clean-up after the increasingly extreme rains brought on by climate change that wash away degraded soils.

Food produced from local sources is nourishment, and a central aspect to food and public health is the availability of fresh, nutrient-dense food. The plan needs to directly address food system resilience in more length and depth, and do so in a way that does not rely on the cost of long-distance transportation. During the pandemic, when global supply could not meet NYS needs, local food systems fed our communities; they were more resilient and nimble in responding to the crisis. Because of this, we must support the ethical and diverse practitioners of NYS local farms and communities.

NYS is fortunate in that it has a significant population of farmers. Among these groups are those whose surviving indigenous ancestors passed down both knowledge and practices, African-American migrants who fled Southern white supremacy and brought north varied agricultural techniques, and immigrants from various contemporary wars and areas of climate devastation who apply their own expertise to the land. We should celebrate this cultural

richness by investing in climate justice that ensures racial justice as well.

Sincerely,

Peter Post