From: Jennifer DeFrancesco
To: erda.sm.scopingplan
Subject: Draft Scoping Plan Comments - Energy Intensive and Trade Exposed
Date: Wednesday, May 25, 2022 10:42:08 AM

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Re: Draft Scoping Plan Comments - Energy Intensive and Trade Exposed

Dear New York State Energy & Research Development Authority Committee,

The first and most glaring issue with the Climate Action Council's (CAC) draft Scoping Plan is the complete omission of the Wood Products manufacturing sector in the Energy Intensive and Trade-Exposed section (EITE). Our industry is 6th in the state in terms of overall manufacturing with significant environmental and economic benefits for New York State. Our sector and markets encourage and support forest management, forest carbon sequestration and adds sequestration in durable hardwood products. Paper and wood product manufacturing is the only industry that has a net positive environmental and carbon benefit in clean air, clean water, wildlife habitat and biodiversity

ESFPA and many of our member companies that manufacture paper and hardwood and softwood lumber as well as export companies of lumber and whole wood are classified under EITE Industries, which will be impacted by the CAC's draft Scoping Plan if enacted as is. This category of industries is an extremely dissimilar category. A one size fits all approach to impacting climate change through the scoping plan regulations will only yield a reduction in economic activity in New York, and a larger environmental footprint globally – it is counterproductive to the goals of the plan and must be addressed on a sector specific and site-specific basis. We are asking the CAC to more overtly include our sector to this aspect of the plan and for the CAC to be cognizant of the industry specific issues and provide a section for the forest products industry.

Energy Intensive industries are those which the cost of electricity and fuel costs divided by domestic production is greater than 5%. Trade Exposure is defined as Imports + Exports divided by the total value of domestic production + imports >15%. Industries which fall under this category are: aluminum production, cement manufacturing, chemical manufacturing, glass manufacturing, iron, copper and nickle ore mining; iron and steel mills, paper, pulp and newspaper print mills and semiconductor manufacturing. We would also suggest adding the hardwood and softwood sawmills, denified wood pellet mills and pallet manufacturing facilities throughout New York. Such a diverse gathering of industries cannot adhere the same plan.

Additionally, the plan does not acknowledge interstate or international trade exposure. Enactment of the CAC's draft scoping plan as is will put all New York companies at a significant economic disadvantage over their counterparts in neighboring states or international trade partners.

We are asking the CAC to develop sector specific, and in some instances mill specific, strategies to achieve their CLCPA goals by 2030 and 2050. All while ensuring that our forest related manufacturing Is protected from "leakage". Movement of any of these mills from New

York to any other state or country will result in a greater greenhouse gas as well as environmental footprint. Needless to say the loss of family supporting wage jobs in rural New York State.

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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