From: Bruce Clapper
To: erda.sm.scopingplan
Subject: Draft Scoping Plan Comments - Energy Intensive and Trade Exposed copy
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Re: Draft Scoping Plan Comments - Energy Intensive and Trade Exposed copy

Dear New York State Energy & Research Development Authority Committee,

The Climate Action Council (CAC) is proposing the adoption of zero emission vehicles (ZEV) for all trucks, busses, and non-road equipment. As it currently is written, the draft scoping plan does not acknowledge the lack of any ZEV technology for medium and heavy-duty vehicles which are essential in many sectors, including forestry, across the state. Although the technology is getting closer to production, there are currently no ZEV options for medium and heavy-duty equipment that can operate in the conditions in which the forestry sector works throughout rural New York State. A one-size fits all strategy for zero emissions for medium and heavy-duty equipment will cripple the supply lines from the forests to mill. This isn't just difficult for our sector, but it is impossible. The current infrastructure cannot support such regulations.

Forestry sector vehicles travel from their point of origin upwards to 100 miles where they meet loggers in the woods, upwards to 100 miles where they meet loggers in the woods, spend hours loading logs or chips and the run to mills which receive the timbe rand fiber to concentration yards and manufacturing facilities scattered around rural New York. These runs are often made several times a day, during a 24 hour cycle.

Our industry is concerned that the draft Scoping Plan denies the use of anything non-electric (with limited exception to back-up power generators) There is no provision for allowing the use of other renewable energy systems such as wood, renewable natural gas, or renewable biofuels all of which could provide for both transition fuels and permanent substitution fuels going forward.

The draft Scoping Plan does acknowledge the limits of electric geothermal and air sourced heat pumps in extremely cold circumstances and that buildings will require secondary heating systems, including wood heating systems. In addition, hundreds of thousands of upstate rural homeowners and commercial businesses use wood, often harvested from their own forests, for primary and secondary heat sources. Failure to have secondary wood heat these residents would have frozen pipes and other thermal risks to life and property. However, there is no such rationale being offered for the heavy and medium use vehicles with equally significant needs.

In order to meet the goals of the CLCPA, more than half of the current marketplace for internal combustion engines must be exchanged for electric. This will require the rural market of farm and forest transports and long-haul transports to have viable low carbon fuel alternatives that are currently not even mentioned in the draft scoping document. We support the establishment of a clean fuel standard for New York, which would be designed to foster investment, facilitate transition, and provide a range of technology alternatives in the clean

fuel economy, including renewable liquid fuels for difficult to decarbonize transportation sectors.

As a member of the Empire State Forest Products Association (ESFPA), I recognize that New York is committed to greater electrification across our economy and support the wise pursuit of these goals. We need to ensure that there is flexibility in the policies and programs to ensure that there are no unintended consequences or impacts to the vital forestry industry and economy. Our association 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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