

Draft Scoping Plan Comments  
New York State Energy Research and Development  
17 Columbia Circle, Albany, New York 12203-6399

As citizens, residents, and traditional farmers, we are concerned about certain parts of the "New York State Climate Action Council's Draft Scoping Plan". We strongly oppose Strategy E2- "Accelerate Growth of Large-Scale Renewable Energy Generation" on page 158 and 159. The loss of agricultural and forested land by conversion to renewable energy projects of all sizes is a threat to local communities, beginning farmers and those with limited resources to provide for themselves in rural areas. For this reason, we strongly urge strict application of the principles on page 42, specifically "Preservation of Culture and Tradition" and "Protection and Restoration of Natural and Working Lands Systems and Resources". We support the strategies suggested in "Agriculture and Forestry" (Chapter 15) and the Chapter 19 "Land Use" Strategies LU-1 to LU-7, (pages 274-275), especially those in LU-3 on page 282 that "Increase support for historically underserved farmers" and "Enhance local capacity to conserve lands".

On page 34, it is suggested that the plan include "broader considerations of burdens, risks, and vulnerabilities within communities". Please notice that in Chapter 12, "Buildings", page 125, Strategy B1 recommends adopting all-electric State codes on an accelerated time frame. We object strongly to this, as it would be an extreme burden to many homes in rural areas who do not have, want, or have access to, electric service.

Another serious burden would be if the State, citing concerns for Particulate Matter in "Public Health" (Chapter 8), would make attempts to restrict use of wood combustion for heating, cooking, or "agroforestry", especially maple syrup production. Residential wood heating in New York represents only 2% of homes (page 62), and "CO2 associated with the combustion comprises a very small portion of statewide emissions (less than 4%). Agriculture and forestry work contribute the smallest amount of greenhouse gases (6%)(page24) and part of this is the decomposition of dead trees. However, harvested wood products store greenhouse gases (page 24), removing dead trees is an important part of sustainable forest management (page 197), and our forests and farmlands provide the ONLY viable method of removing carbon dioxide and greenhouse gases. For all these reasons, we would be strongly opposed to any attempt to restrict the use of wood as a fuel.

Sincerely, *Pete Schwartz Fitel (Bishop)*

Representing: *Members (25)*

Towns of: *Pottsdam - Madrid - Norfolk*