

DELAWARE AGRICULTURE AND FARMLAND PROTECTION BOARD

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NYSERDA
17 Columbia Circle
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RE: New York State Climate Action Council Draft Scoping Plan – Comments

To whom it may concern:

This letter is in response to the newly released **“New York State Climate Action Council Draft Scoping Plan” (CLCPA)**, released in December 2021. As the Delaware County Agriculture and Farmland Protection Board we would like to submit this letter in response to the plans goals and mandates regarding the use of agricultural and forested lands. After a thorough review of the plan, particularly Chapter 15 of the Scoping Plan, we have reservations about the implementation of the plan as well as the costs associated with the changes proposed. There appears to be a limited understanding by the authors about the reality of agricultural production and the tight margins associated with farming and forestry in New York State that will limit success based solely on the cost of the mandated programs and practices.

Chapter 15 of the scoping plan “Agriculture and Forestry”, defines a vision for the year 2030 to reduce emissions for GHG that is unrealistic and unattainable as are the further reductions required by 2050. The science and the financial means to achieve these goals is just not in place and won't be for the foreseeable future. The plan lacks definitive science and evidence that illustrates eliminating the use of fossil fuels and converting to full electrification over the proposed time frame will not disrupt the agriculture and forest industries to the point of collapse. The reduction of fossil fuels over an extended period of time will come to pass but cannot be forced without replacements fully in place and available. That is not the case at the moment nor will it be in the next 25 years. To put our economy at risk while other countries continue business as usual is nothing more than pure politics and as a result we could face catastrophic consequences.

Delaware County is uniquely suited to address many of the mandates proposed given our programs associated with agriculture in the New York City watershed. Many of the goals including precision feed management and enhanced BMPs on agricultural lands are already common practices for farmers in Delaware County. In fact, many of the identified practices were developed in Delaware County as part of the watershed protection programs. As this is the case we are also aware of the increased costs associated with these practices. Given the narrow margins for farming in New York State the majority of family farms and even many of the larger operations will not be able to

afford these practices on their own. The costs in our watershed communities are absorbed through the watershed programs, making them more cost effective here, however, without outside funding sources or financial support these are not practices that can be easily implemented. As these are proposed as mandates the unaffordable nature of these programs will force more farms to shut down and agricultural lands to go fallow.

These are important points as the loss of agriculture in New York State threatens food supply chains and increases costs associated with importing food products from other places. The loss of agricultural operations in New York State is already increasing demand and costs in the super markets making the cost of living in New York State unsustainable for the majority of families. The costs of food, housing (including rent/mortgage, heating and home repairs) and transportation make up the largest percentage of the family household budget. The CLCPA mandates will increase all of these costs with limited funding from state or federal programs to assist other than those communities designated as disadvantaged. The majority of rural communities that support agricultural operations are not in this designation, making the mandates even more burdensome on the agricultural community.

Delaware County's leading industries include agriculture, forestry and bluestone quarrying. The people that live and work in Delaware County are experts in the industries and therefore, understand the significance they play in the overall state economy. The operations themselves employ thousands of people, but the real impact is the secondary economy that is realized from their existence. Truck drivers, processors, veterinarians, feed retailers, soil scientists, shop clerks and even regulators all have jobs and pay income tax as a result to New York State. The loss of these important industries would mean the loss of hundreds of thousands of jobs and income to the state as a whole.

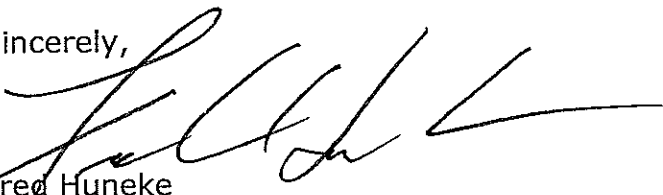
Industrial, commercial and agricultural businesses require consistent and reliable sources for heat, operations and transportation. Without these basic services businesses cannot function profitably and will ultimately seek refuge in other states taking jobs and people with them. Most of these businesses already struggle with the unreliable and fragile electric system. Several agricultural enterprises have invested in solar systems to support their electric needs to find that they are also unreliable and in many instances fail to work at all. The technology is not efficient enough to meet the demands of these industries. Due to the fragile nature of the electric grid most agricultural enterprises must have back-up generation to insure the demands of the farm can be met. Animals must be fed, watered, milked and cared for, requiring alternate sources of energy when the grid fails to provide the necessary amount of electric for operation of these sensitive industries, any loss of that redundancy will pose a threat to the health and welfare of livestock and the operations as a whole.

It is the belief of our board that efforts to address the impacts of climate change are better served by providing for research and funding to address the impacts of significant weather events. Communities must first be able to address community resiliency that will incorporate measures to reduce impacts from weather related events while reducing the carbon footprint over time. Once a community has the sense that they are secure, they can afford to invest in carbon reduction efforts that do not threaten their ability to support and sustain their homes, businesses and jobs. The ideal situation is a primary source of energy that will replace the use of fossil fuels on a daily basis with an emphasis on redundancy. A solid plan should allow for the use of fossil fuels to address lags in electric service, loss of power due to extreme weather and of course the ability to incentivize and enable homeowners and businesses to convert over time rather than make that decision for them.

In developing its recommendations, we request the Council consider that most rural communities have less access to technologies to reduce GHG emissions and are more reliant on higher carbon fossil fuels to meet energy needs. The demands on rural communities to provide food, building supplies and water to the larger urban areas is of paramount importance. We must do everything we can to support and protect agricultural enterprises, unfortunately the proposed scoping plan contradicts that goal and makes agriculture, forestry and quarrying near impossible to sustain long term in New York State.

Thank you for your consideration of these comments. We welcome future dialog to help gain a better understanding of the plan and to address these very real issues.

Sincerely,



Fred Huneke
Acting Chair

Cc: Tina Mole, Delaware County Board of Supervisors