



American Forest Foundation

July 1, 2022

Draft Scoping Plan Comments  
NYSERDA  
17 Columbia Circle  
Albany, NY 12203-6399

**Re: Public Feedback on Draft Scoping Plan**

Dear Co-Chairs Harris and Seggos and Members of the Climate Action Council:

The American Forest Foundation (AFF) writes regarding the Council's Draft Scoping Plan, specifically Chapter 15 on Agriculture and Forestry. AFF, a conservation organization that delivers meaningful impact by empowering private landowners to take action on their lands, would first like to thank the members of the Council for the thought put into the Draft Scoping Plan's forestry recommendations and for the opportunity to provide feedback. In particular, we want to applaud the depth of its public sector recommendations, which – once fully implemented – we are confident can help to lead to increased carbon sequestration and storage while helping to keep New York's small and family-owned forests as forests in the coming decades.

The American Forest Foundation and the Nature Conservancy are partners in the Family Forest Carbon Program (FFCP), an innovative new program seeking to engage small family forest owners in forest management activities that enhance carbon storage and sequestration. We believe these outcomes fall squarely in line with the direction New York is taking with its Climate Action Plan, especially given that almost three-quarters of New York's forests are privately owned. This spring, FFCP opened enrollment to landowners in Washington, Rensselaer, Columbia, and Dutchess Counties with plans to open enrollment to much of New York within the next year. As the State moves towards a final plan, we hope that more recognition is given to the work of the private sector – including existing carbon programs – as well as the incorporation of market-based strategies.

AFF also offers the following comments on specific Draft Scoping Plan's strategies:

### AF3. Maintain and Improve Sustainable Forest Management Practices and Mitigation Strategies

- *Implement forest carbon certification program: DEC should develop and implement a Forest Carbon Certification Program, where qualified participants with a certification credential would be able to work under State funded forest programs and forest carbon programs.*

AFF would be curious to understand this proposal further, and we are happy to make ourselves available to flesh out the language should it be incorporated in the final plan. At the very least, before New York State embarks on any carbon certification path, we recommend that the regulating agency familiarizes itself with the existing carbon registries' standards prior to moving forward.

### AF4. Assist Landowners in Implementation of Sustainable Forest Management and Mitigation Strategies

AFF strongly supports assistance and incentives for family forest owners to engage in improved management of their land and to keep their forests as forests. The Draft Scoping Plan's recommendations to amend Real Property Tax Law 480a and create new real property tax incentives, Real Property Tax Law 480b and 480c, would be a significant step forward for empowering New York landowners. We are particularly invested in allowing small and underserved family forest owners the ability to benefit from FFCP enrollment while not being penalized by any existing tax structures. Well-designed financial incentives for forest management activities that enhance carbon storage and sequestration are necessary for widespread practice adoption.

### AF6. Create a New York Forest Carbon Bank

- *Enact forest carbon bank legislation: The State should enact legislation for the creation of a New York forest carbon bank that would allow New York to finance GHG emissions reduction and carbon sequestration activities by New York farm and forest landowners. Limitations may need to be placed on the types of projects and/or the types of industries that can participate to ensure any carbon offsets align with the goals of the Climate Act.*

Understanding that further details on this legislative proposal are to be determined, AFF is pleased to see this proposed strategy in the Draft Scoping Plan. In line with our earlier comments, we hope that the final legislation recognizes and incorporates the work of existing private sector programs and other market-based solutions to increase the adoption of natural climate solutions. AFF also hopes the Council considers additional emphasis on assistance to small and underserved family forest owners in its final forest carbon bank recommendation.

In addition to our specific comments above, AFF would also like to voice its general support for the Council's recommendations under strategies AF7. Monitor Progress and Advance Forestry Science and Technology in addition to AF8. Conduct Education and Outreach on Forest Management. We hope in particular that the Council will further recommend partnerships and recognize linkages with the work in these areas already being performed by the private sector.

The American Forest Foundation wants to offer our gratitude for the work of the Council and for your consideration of these comments. We look forward to continuing to work with our partners across the state to make voluntary carbon markets accessible to small landowners and to create real, long-lasting climate benefits with New York's forests. If you have any questions, please do not hesitate to reach out to James McKittrick at [jmckitrick@forestfoundation.org](mailto:jmckitrick@forestfoundation.org)

Regards,

American Forest Foundation