

Thank you for this opportunity to provide comments on the draft Climate scoping plan. My name is Judith Myerson and I live in Pine Bush, New York, in the town of Mamakating. I am asking that you meet the goals set by the Climate Leadership and Community Protection Act, insure that our state has an effective and realistic plan in place to meet climate goals. By doing so we can serve as a model for other states and the world for a just transition to renewable energy and insure a future for humans and other species on Earth. While I am 72, and will not be here to see the results if we do not quickly shift our path, my grandchildren and their children will reap the consequences of our actions or inactions. We owe it to them to act ethically, morally, and comprehensively now, and do all that is possible to create a livable, sustainable, safe and equitable world for all.

### **BIOMASS AS A FALSE SOLUTION:**

**Please include the following comments and recommendations on Biomass as a false solution.** This will insure that the outcomes of this plan are driven by both climate and environmental justice, as required by, the Climate Leadership and Community Protection Act (CLCPA).

Biomass originates from the raw feedstock of biofuels, which are primarily woody matter burned directly for energy instead of being processed into liquid fuels. This can include agricultural residues like straw, bagasse, pulp, animal waste, forest remnants, solid waste, and sewage. However, biomass holds the ability to produce biogas with the application of heat at low oxygen levels (“thermal gasification”). Biomass as a substitute for fossil fuels is often considered renewable energy in the context of technologies that enable the reuse of biomass and waste streams into reduced-emissions fuels for cars, trucks, jets and ships, bioproducts, and renewable power. However, biomass as energy is not carbon neutral. Instead, it is disruptive to carbon neutrality. Carbon recycling from the atmosphere via the regrowth of trees takes decades, and wood-burning adds to emissions increases and a rise in local pollution. Burning organic material like wood for fuel would pose similar problems.

The concern is simple: burning wood and other organic products adds to GHG emissions and adds to collective emissions. Net contribution poses potentially irreversible impacts as it takes away or cuts down the same resources that reabsorb emissions.

**The CLCPA already excludes biofuel as a source in carbon offset programs and under Clean Energy Standards [Tier 1]; it must be expressly stated in the final scoping plan that further steps must be enacted to stop incentivizing the burning of forests in the name of renewable energy.**

Biomass as a substitute for fossil fuels is more carbon-intensive than petroleum due to upstream emissions. Trees can be regrown to pull CO<sub>2</sub> from the atmosphere, but it takes a century for CO<sub>2</sub> emissions from burned wood to be reabsorbed in a growing forest. And burning wood to generate electricity releases more carbon dioxide than

fossil fuels to produce the same amount of energy. Harvesting biomass impedes carbon sequestration and weakens the ability of the forest to sequester carbon. (NY state forests store more carbon than any other land use in the state.) Finally, harvesting biomass as a substitute for fossil fuels can lead to soil degradation, flooding, and landslides due to land-use change.

**The final scoping plan, particularly as it relates to the agriculture and forestry section, must address the fundamental benefits of leaving forests intact and carefully account for continued carbon sequestration in any proposals that suggest harvesting as a climate mitigation strategy.**

As expressed by the Climate Justice Working Group, the concerns around combustion and emissions release must not go unheard.

**Further, the final scoping plan must remove AF20 as a strategy for New York's bio-economy because it calls for an expansion of biomass and bioenergy (feedstocks and bioenergy products).**

## **SUMMARY OF COMMENT AND RECOMMENDATIONS**

1. Biomass as a substitute for fossil fuels is a false solution and should not be in the final scoping plan. Biomass harvest would reduce the capacity of New York's forest from acting as a carbon sink.
2. Not harvesting biomass as a substitute for fossil fuels means that an intact forest also preserves the full ecosystem of that forest, including the wildlife habitat.
3. Preserve the climate benefits of keeping a forest as a forest.
4. Not burning biomass as a substitute for fossil fuel also means that we are not perpetuating our reliance on fossil fuel pipelines and infrastructure.
5. Competition for the finite land area to grow products—food crops that feed our state and nation—must be a top priority.
6. Ecosystem conservation will also translate to benefits for human health, water, and air quality and for those living in near forests or visitors, helps to improve mental health.
7. Combustion of biomass will lead to increased air emissions and impacts to public health.