

Comments on New York State Climate Action Council Draft Scoping Plan

Submitted by Brent Kelley

[REDACTED]
Belfast, NY 14711

[REDACTED]

In general I frame these comments with the fact that I disagree in large part with the entire concept of radical response to climate change, and in many ways I categorize this plan as such. It is the height of folly to formulate a plan based upon technologies that have been untested for long term use and in some cases are not yet existent. Parts of this plan do just that.

My first concern is with battery technology and falls into two areas; (1) supply of materials and resources to make batteries and (2) how to recycle expended batteries safely. Although we have good ideas how batteries can be made and used, a plan at the scale to power New York State will create unforeseen demands of magnitude unexperienced before. Not only that, but it stands to reason that there will be enormous demand competition for the very same resources as the global community seeks to respond to climate change using similar technologies.

It may be that the resources do not even exist on the planet to meet this demand.

Proven global reserves of cobalt, chromium, lithium, nickel and zinc appear to be less than the anticipated demand assuming technology currently being used. This is according to Phil Rossetti and David Banks in their March Report prepared for Citizens for Responsible Energy Development. Most renewable energy sources are more mineral intensive than hydrocarbon generators. It is estimated that electric vehicles are about 6 times more mineral intensive and wind turbines nearly 9 times more mineral intensive.

Even if supplies were available, the prices for many of these minerals may make them unaffordable. Lithium, lithium carbonate and lithium hydroxide, for example have increased in price nearly tenfold since September of 2020. Neodymium (used for wind turbines) has also seen large price increases. Bear in mind that the National Environment Policy Act (NEPA) hampers and limits domestic mining for many essential minerals so they must be purchased from foreign sources.

Sourcing from foreign suppliers entails a host of problems in itself. Lack of appropriate regulation and resources often creates enormous environmental damage from mineral extraction adding a cost typically unrecognized. Cobalt from the Democratic Republic of the Congo is mined with child labor. Polysilicon for solar panels from Xianjiang, China is produced using Uyghur slave labor by the Chinese. The list goes on.

This reliance on foreign suppliers plays into security concerns as well. We would be at the mercy of supplier countries and corporations to ensure a supply of these rare materials by limiting energy supply to electric only.

The plan addresses carbon reduction through many significant and obvious areas, but it also ignores some that should be obvious as well. For example, the plan limits the source fuel for heating requirements but ignores the size of housing structures. Most of New York residences rely on either heating or cooling, and in many cases both at various times of the year. The amount of cubic feet of space in a structure dictates (to a large extent) the amount of energy necessary to heat or cool that building, but no limits are established for maximum size of housing. Yes, this would be a sacrifice on many people's part (to set such a limit), but so, too, is eliminating sources of heat such as local wood or natural gas available on site.

Eliminating woodburning for heat creates many problems in this area. Firewood is a reliable and locally sourced fuel for heating and cooking in the rural areas of New York. I support nearly all my

heating needs with firewood from my forest land. We process maple sap into syrup using the same wood supply following long tradition. Almost all of the firewood comes from cutting the waste tops of trees that had been harvested for lumber helping to maintain healthy woodlots. Who will remove these tops from the woodlots if they cannot be sold for firewood? Leaving them in place makes future timber harvest difficult and creates a fire hazard over time.

The scoping plan suggests that burning wood could be employed to supplement heat pump or geothermal heating in extreme cold conditions, but who will supply that firewood? Local suppliers will not maintain inventory in expectation that there may be a very cold winter week or two. Since demand for firewood would dwindle, no one could make a living selling it and suppliers will find other work. That provision presupposes that residents even bother to maintain woodburning ability for use only in extremis. Anyone that thinks this is a viable aspect of the plan has obviously never heated with wood.

It bears pointing out that wood as a fuel is very renewable.

Within the plan the discussion of composting is addressed but confuses me. It seems to me that composting locally in rural areas is highly desirable. Backyard composting is highly efficient and allows people to get further value from purchased produce than just the initial consumable portion. Creating municipal composting requires transport of both raw materials destined for composting and again for finished product. Transportation is energy consumptive even if it does not contribute carbon to the atmosphere, so why do it when unnecessary?

The area where I live is populated heavily by Amish communities. Almost all of the members of these communities may not use electricity from the grid regardless of the initial source. Their religion imposes strict restrictions that are consistent with a simple way of life reliant on self-sufficiency and hard work. Any use of electric tools or appliances generally is derived from generators (either gas, diesel or natural gas) but even this is rare and infrequent. Cooking, lighting and heating almost invariably rely on wood, kerosene or coal. When I discuss the Scoping Plan with my Amish friends and neighbors the reply is invariably that they will simply leave New York. In my neighborhood this would mean that roughly 50% of the land and landowners would be forced out by this plan.

It is difficult not to see the elimination of wood or coal burning as discriminatory against the Amish people. Ironically these same people are probably among those with the smallest carbon footprint because they use horses rather than their own gas powered vehicles for transportation and farm work. As an aside, their religion also imposes a tradition of stewardship of the land resulting in widespread sustainable environmental practices.

And the Scoping Plan would drive these communities out of the state.

I appreciate the effort and study that went into developing this plan and even understand the impetus behind the effort. However, to develop a “solution” or “remedy” to climate change based upon current technology will have far reaching negative consequences and require huge economic sacrifice. As author, Bjorn Lomborg says, “In a panic, world leaders have committed to wildly expensive but largely ineffective policies that hamper growth and crowd out other pressing investments in a better world...”

Do we know what the consequences of covering thousands of acres with solar panels might be? Have we adequate capacity to generate the quantity of electricity needed for “all electric?” Have we figured out how to recycle all materials and components that are needed for electrification on New York? How dependent will total and absolute reliance on electricity as our only energy source make us on production sources? Will these changes make New York State competitive in attracting industry and employers to the state or will it have the opposite impact? And let’s not forget the big question of just how much this will all cost.

As Lomborg opines in his book False Alarm, is this the best time to make absolute and irreversible decisions about climate change reactions, and furthermore is this the best way to approach it?

Many of the proposals in the plan seem viable and appear to make good sense. But the implementation feels highly coercive when traditional fuel sources are proscribed and precluded from use to ensure adherence to the plan. If all this is such a great idea, why must people be forced into compliance?