To: Climate Action Council

From: Green Sanctuary Committee, First Unitarian Universalist Society of Albany, 405 Washington Ave., Albany, NY 12206

Subject: Public Comments on the Draft Scoping Plan

Date: January 15. 2022

Dear Climate Action Council:

Thank you for all the hard work you have done in putting together the [Draft Scoping Plan](https://climate.ny.gov/Our-Climate-Act/Draft-Scoping-Plan). We were particularly impressed with the sections on Forest and Agricultural Management. The only thing we would add is that we should plan for warmer temperatures in the future. It’s imperative that our forests do not transition from a carbon sink to a carbon source, which could happen in a warmer climate without planning. As trees become less acclimated to the changing climate, they are susceptible to an increase in diseases, weather-related damage, fire, and pests. Forestry experts in NY State could advise on the planting of non-invasive species of trees better acclimated to a warmer and more erratic climate. If present trees die off in the future, the rotting wood will contribute to atmospheric CO2. This wood could be utilized in the production of Biochar, which will fix the carbon in the wood for years to come. As you know, the biochar could be instrumental in improving the soils of our Agriculture sector. The heat of combustion in producing Biochar can be used to produce much-needed electricity, as has been [extensively studied.](https://www.fs.fed.us/research/highlights/highlights_display.php?in_high_id=577) We think these biological methods of carbon capture are much more efficient and less expensive than direct carbon capture technologies, which are not very successful at the present time and require the building of new infrastructure that is in itself, carbon-producing. There is no better way to capture carbon than photosynthesis. And there is no better way to utilize photosynthesis than to preserve, expand, and transition our forests to a new climate.

We have also become increasingly alarmed at the expansion of cryptocurrency mining in NY State and the world. We understand that some have argued that if NY were to disallow many intensive carbon-producing industries under the CLCPA, the industries may set up operations in another state, which you have termed “leakage.” Furthermore, they argue that had the industries stayed in NY, they would have produced jobs, and perhaps produce less GHGs because of incentives offered by our State. Preventing leakage is a laudable goal of the CAC. However, we think that cryptocurrency mining is one industry that should be banned in NY. This is an energy-hogging industry with no real product, and it contributes to thermal pollution of our precious waters. We are not aware of how this industry contributes to significant jobs in NY or any other economic advantage. Lastly, NY State is a leader in fighting climate change with the passage of the CLCPA. The federal government is looking to your efforts in paving the way forward in climate change remediation for the rest of the country. Banning cryptocurrency mining would send a strong message that this industry is unacceptable in its current state, which uses large amounts of electricity for the questionable purpose of making money in speculation. On page B-6 of the Appendix, it is stated:

“Address current and prospective emissions from cryptocurrency mining operations to prevent the facilities from exploiting a loophole in PSC oversight to repower fossil generating facilities behind the meter. Place a moratorium on these operations until the conclusion of a full generic EIS to determine whether these operations can be mitigated to comply with the CLCPA.”

This aspect of the Scoping Plan regarding a moratorium should be implemented immediately, and the CAC should strongly consider banning this industry for our state.

Thank you,

Charles Manning,

Chair, Green Sanctuary Committee

First Unitarian Universalist Society of Albany

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