

To: Climate Action Council (CAC)

From: Barbara Spink, Albany, NY

Subject: Public Comments on the Draft Scoping Plan

Date: April 24, 2022

Dear Climate Action Council:

Thank you for your thoughtful and comprehensive [Draft Scoping Plan](#) (DSP). I am deeply concerned about Climate Change and proud of the important step NY State has taken in the passage of the CLCPA. I live in Albany, NY, and I am Co-Chair of the Capital Region Interfaith Creation Care Coalition and a member of the Green Sanctuary Committee of the First Unitarian Universalist Society of Albany. My comments do not necessarily represent the views or opinions of these two organizations.

### **The Need to Plan for the Future:**

Our current lifestyle is not sustainable in the long run, and NYS should work toward change, although it may take many years. The urgency of the climate crisis requires immediate action to reduce greenhouse gases, including strategies that can buy us some time such as drastically reducing methane. However, I applaud the CAC's consideration in imagining a more sustainable future with Smart Growth Practices and thinking about how to eventually achieve it. The present suburban and rural sprawl, which is dependent on the automobile, although popular, encroaches on natural habitats and requires enormous energy to maintain. How can we achieve more dense, and localized communities that are self-contained with schools, services, and shops on site, which would reduce the need for extensive driving and preserve wild areas to allow Nature to do its job in maintaining clean air, biodiversity, and equilibrium in the natural world? I affirm your ideas about revising local land-use rules to encourage this type of development in the future. Strategies designed to make public transportation more attractive to the public, such as described on page 116 of the DSP (Variable Pricing/Parking Policies, Vehicle Registration Fees, Mileage-Based User Fees, and Tax Increment Financing/Special Assessment Districts) could possibly be used to supply the funds to make public transportation free, which I believe is the only thing that would really encourage the public to use public transportation. Also consider tax

incentives that discourage the current practice where each person owns their own personal car in multi-person families and homes, which would encourage the use of public transportation and ride sharing. Please also consider how to increase proximity of natural areas and parks to low-income communities.

It is important that we also plan for a warmer future with more erratic weather, which means that our forests will be susceptible to an increase in diseases, fire, pests, and weather-related damage. The weakening of our forests risks that they will make a dangerous transition from a carbon sink to a carbon source. We could consider how to transition now to trees that are not invasive but are more resistant to pests and adapted to warmer temperatures and unpredictable weather. We have a wealth of forestry experts in NY State. We should consider that present trees may die off in the future, and the rotting wood will contribute to atmospheric CO<sub>2</sub>. This dead wood could be used in the production of Biochar, which is a natural way to fix carbon and can be used to improve the soils for use in Agriculture. The heat of combustion in producing Biochar can also be used to produce electricity ([Novel Technology Uses Waste Wood to Make Bioenergy while Sequestering Carbon | US Forest Service Research and Development \(usda.gov\)](#)).

As discussed on page 315, NYS should also give some consideration to the possibility of climate refugees and how to encourage residents with intact homes to house some of these refugees, which would have a lower GHG footprint than building new facilities. Often overlooked is the political instability that will surely follow population migration and the degradation of our environment.

### **Direct Air Carbon Capture Alternatives**

I fully agree with the following comments from Barry Pendergrass regarding his assessment of Carbon Capture and Storage (CCS) technologies:

“CCS from open air have significant negative environmental consequences and they should not be relied upon to achieve DSP objectives. These technologies require excessive amounts of energy to operate, they produce toxic byproducts, effluent must be piped to underground storage sites which will lead to leaks in transit or storage, and the CO<sub>2</sub> reduction in the surrounding area is harmful to plant life damaging the ecosystem. The likelihood of leakage and groundwater contamination from a captured carbon piping system has not been addressed. Experience with oil pipelines shows that leaks are a not question of whether they will occur but rather where and when. In

addition to operational problems, no viable large scale CCS technology exists or is on the foreseeable horizon. The inclusion of any CCS option in the DSP renders the associated recommendations wholly conjectural. This is a pipe dream and should not be funded by New York State. It cannot be included as an implementation option since it does not exist. The U.S. government is subsidizing research on CCS with billions of dollars. If a safe and effective CCS technology emerges in the future, it can be employed in New York State to help achieve negative GHGs or at least net zero emissions.

- The DSP should oppose support for CCS until the issues cited above are addressed.
- The DSP should acknowledge the federal government is pouring billions of dollars into research on CCS and if a successful technology is developed in the future, it can be examined for feasibility in New York.
- DSP recommendations dependent on CCS should be withdrawn.”

There are further reasons to be skeptical of CCS technologies: 1) The technology, even if minimally successful, can be “green-washed” by the fossil fuel industry to justify continued drilling and burning of fossil fuels, 2) the building of this necessarily massive infrastructure is in itself carbon-producing, and 3) the idea that we should depend on expensive technology to mitigate climate change is a mind-set that is opposed to a new paradigm of thinking where we consider how best to work *with* Nature rather than dominating it. There are better biological solutions where we can spend the money, such as soil reclamation, habitat creation, researching ways to use photosynthesis, and building up our forests, many of which elaborated are in the DSP.

### **“Proof of Work” Cryptocurrency**

A recent article on April 9, 2022, in the *Times Union*, “Embrace crypto for NY’s economic benefit” argued against the 2-year moratorium that is proposed for “Proof of Work” cryptocurrency mining in NY State, which was suggested in the appendix of the DSP. The DSP suggested 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 Climate Leadership Community Protection Act.” A bill has also been proposed in the NYS Senate (S6486B) for the same reasons.

The author of the *TU* article was John Olsen, who is the Blockchain Association’s outreach and advocacy strategist for NY State. He wrote that

regulators must nurture the industry because it "...promises massive investments and well-paying jobs for New Yorkers in every corner of the state." As to the first benefit, investments, it is unclear what tangible product is generated from crypto, which uses enormous amounts of electricity for the questionable purpose of making money in speculation. As to the second benefit, jobs, a study by the Cambridge Centre for Alternative Finance in the UK (<https://www.jbs.cam.ac.uk/faculty-research/centres/alternative-finance/publications/global-cryptocurrency/#.YmrB7drMKUk>) found that in 38 countries with 150 cryptocurrency companies approximately 2000 people are employed full-time by crypto. Therefore, the average number of employees in one company is about 13 people. To increase employment in NYS by 100 people, it would require 8 cryptocurrency companies. That small number of jobs seems hardly worth it for our state to embrace this new and unproven industry that is clearly harmful to the environment. A moratorium is needed to study the effects of crypto on the energy goals of NY State, and to determine the extent of thermal pollution that this industry produces to cool its many computers working 24/7 to solve problems that reward participants with cryptocurrency. Public relations of the cryptocurrency industry should not be promising great economic benefits for these operations without having to substantiate exactly what those benefits are and if they outweigh the considerable harm to the planet that the industry poses to the planet. These ideas were condensed in my [\*Letter to the Editor\*](#) ([Letter: Crypto benefits questionable \(timesunion.com\)](#)).

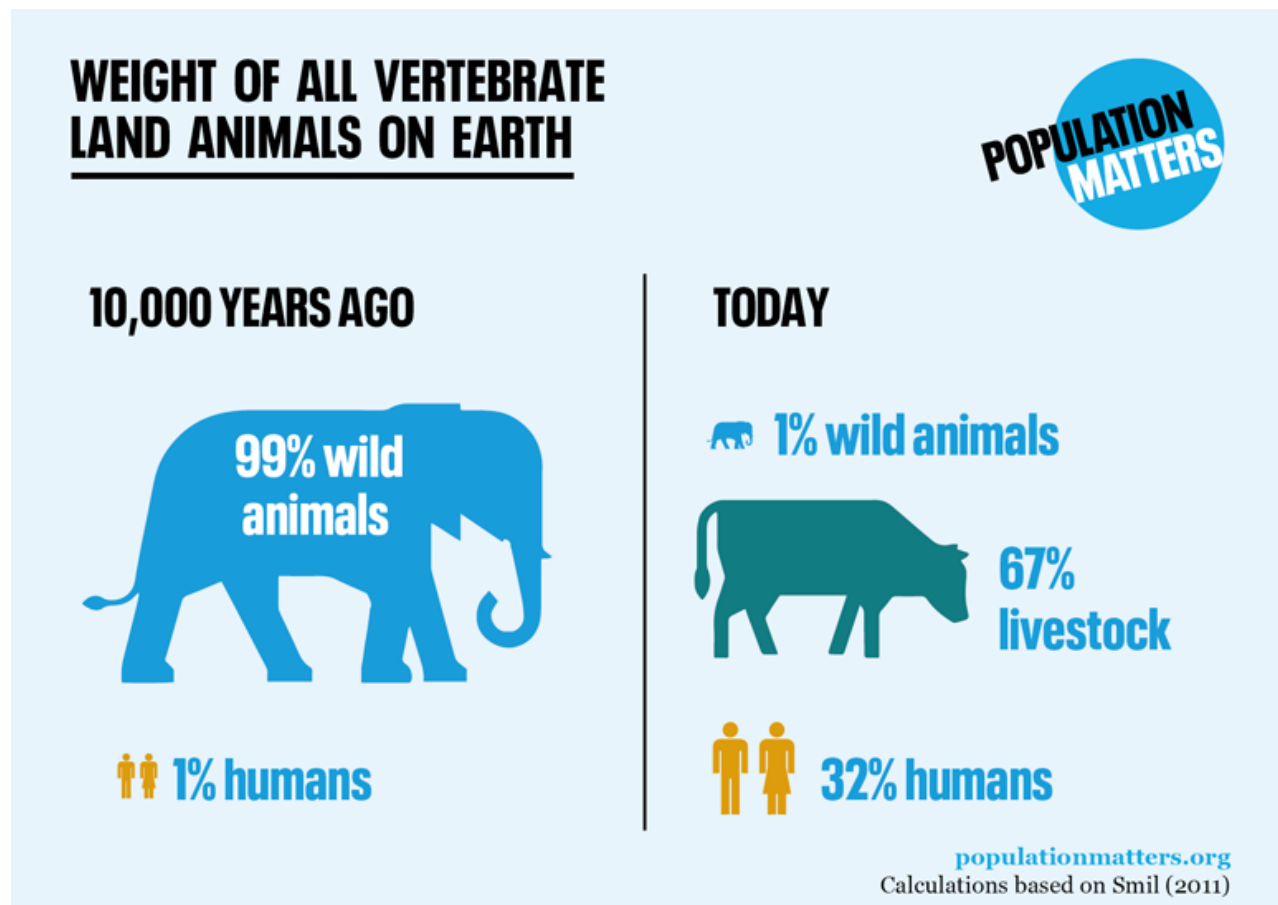
NY State is a leader in fighting climate change with the passage of the CLCPA, and what we do may be adopted by other states or the federal government. The benefits of crypto are so questionable, that banning "Proof of Work" cryptocurrency mining is appropriate if the CO<sub>2</sub> and thermal pollution issues cannot be resolved. This would send a strong message to the rest of the country that this industry is unacceptable in its current state.

## **A New Way of Thinking about the Environment**

On page 272, the DSP states:

New York State envisions a significant shift to infill development and redevelopment of existing buildings in municipal centers with existing infrastructure to proliferate compact, mixed-use, mixed income development, **which will attract future population growth**, support Disadvantaged Communities, and accelerate TOD.

It's not clear what population growth you want to attract in this statement, but I find it curious that in all this discussion of Climate Change and habitat destruction, that the core reason for these changes is repeatably avoided or unacknowledged. There is no doubt that the cause of Climate Change, habitat destruction, invasive species, pollution, extinction, loss of diversity, and resource depletion is anthropogenic. The following graphic shows this rather dramatically:



Visualization of the massive shift in biomass proportions — humans and their domestic animals versus wildlife — that has taken place during the past 10,000 years on planet Earth. Chart courtesy of [populationmatters.org](http://populationmatters.org). Further information can be accessed here: <https://news.mongabay.com/2019/11/why-you-should-care-about-the-current-wave-of-mass-extinctions-commentary/>

What this graphic shows is how tenuous a hold wildlife has on continued existence at the present time. When populations of other species drop to such low levels, it doesn't take much—like an increase in global temperatures—for their numbers to fall lower, increasing exponentially the

chance of future extinctions. Loss of diversity threatens the web of life itself, which may collapse. Current projections predict that population, which is now at 7.9 billion, is expected to increase to 8.5 billion in 2030, and to increase further to 9.7 billion in 2050 and 11.2 billion by 2100 (<https://www.un.org/en/global-issues/population>). This is alarming, indeed, when our present population level is unsustainable for other species with which we share this planet and therefore unsustainable for us.

I suggest that the Climate Action Council pave the way for the rest of the US by addressing the problem of over-population. It has long been argued that economic growth is tied to population growth. However, your own graph on page 73 shows little increase in population in NY State, while at the same time, Gross State Product increased considerably. One could argue that, since population in NY State is not increasing much, we should not concern itself with this problem. Firstly, persons in the US have a much greater carbon footprint than in many other countries, therefore, we should consider *reducing* our population to obtain balance with the natural world. Secondly, NY State may face increases in population from climate refugees from other countries and US states where the effects of Climate Change are greater. At the very least, we should no longer be encouraging population growth. Apart from the politically thorny issue of abortion, which may be decided by the courts or voters anyway, there are steps that can be taken to encourage smaller families, such as sex education, free contraception, education of the public, opportunities for youth and especially girls, and tax incentives. I'm sure there are experts who know more than me about how to achieve sustainable population levels, but without addressing this underlying cause of all our environmental problems, everything else we do is a band-aid.

Sincerely,

Barbara Spink