

Proposed Comments from NYSAF on the NY Climate Action Council Draft Scoping Plan
Version 2.0
May 16, 2022

To be submitted to:
Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY. 12203-6399

The New York Society of American Forests (NYSAF), on behalf of the professional forestry community in New York State, respectfully submits the following comments on the Climate Action Council Draft Scoping Plan, pursuant to the Climate Leadership and Community Protection Act of 2019.

RECOMMENDATIONS:

Specifically, (1), NYSAF supports the calls, in Chapter 15, Agriculture and Forestry, for increasing and encouraging sustainable forest management on New York's 13.7 million acres of privately owned forest land and 800,00 acres of State-owned forest land outside the Adirondack and Catskill Forest Preserves. **We strongly recommend that trained, qualified and properly credentialed foresters, with expertise in silviculture and carbon management, be required in forest management planning and implementation to ensure long-term resource, economic and climate objectives are met and measured accurately.**

In addition, (2), NYSAF supports efforts outlined in Chapter 19, Land Use, to retain forested lands. **We strongly recommend increased efforts to retain and increase private and public ownership of managed, "working forests", which contribute greatly to carbon sequestration while also providing economic incentives for landowners to hold, invest in and manage those forests, creating and sustaining jobs and revenues to the state from diversified forest based industries. Management efforts must also address the threats to forests posed by invasive and/or exotic insects, diseases and plants which can kill trees or interfere with desired regeneration. Loss of trees and forests to these agents can limit both carbon sequestration and storage in forests.**

WHO WE ARE:

The Society of American Foresters (SAF) represents forestry professionals and provides leadership to ensure that all members of the profession achieve excellence in sustainable forestry and natural resource management. The mission of SAF is to advance sustainable management of forest resources through science, education, and technology, promoting professional excellence while ensuring the continued health, integrity, and use of forests to benefit society in perpetuity.

The New York Society of the SAF (NYSAF) represents over 350 professional foresters in New York State, working in public agencies, private forest industries, NGOs, academia and private consulting firms, as well as forestry students. Members are actively involved in managing public and private forests across the state.

COMMENTS ON CHAPTER 15, AGRICULTURE AND FORESTRY:

As the Draft Scoping plan states, forests across New York, in public and private ownership, actively managed or held as “Forever Wild”, are significant carbon sinks and sequester vast amounts of carbon from the atmosphere each year. This all occurs naturally, with or without human assistance or intervention. However, sustainable management of forestland can increase carbon sequestration, by increasing tree growth, protecting trees from mortality due to insects and diseases, increasing or accelerating reforestation, and expanding forest cover through afforestation on abandoned agricultural lands. Professional foresters are trained in managing forests to achieve desired results, through planning, monitoring, protection and sustainable harvesting of commercial wood products for the benefit of society. Management strategies to more specifically increase and measure carbon sequestration and retention in forests are evolving and emerging across the forestry profession, from academia to field foresters. Therefore, it is our belief that Climate Action Programs designed to promote forests and forest management specifically (and additionally) to increase Carbon sequestration and storage in New York’s forests should require the use of professional, qualified, trained and credentialed foresters in management planning and implementation.

The national Society of American Foresters has developed position statements on the use of “professionals in natural resource management” and “state programs to credential foresters”, attached, which offer useful guidance in these areas that should be considered as recommendations for forest management for climate response are developed.

COMMENTS ON CHAPTER 19, LAND USE:

Chapter 19 rightly points out that undeveloped forests, cropland, wetlands and other open spaces in New York (and worldwide) are critical to addressing climate change through carbon sequestration and retention. Conservation, expansion and sustainable management of forests, in particular, outside the Forest Preserves, can play an increasing role in reducing atmospheric carbon and helping New York meet its climate goals.

Existing programs regarding forested land, such as regulation, tax incentives (Forest Tax Law, RPTL 480 and 480-a), Smart Growth planning and local zoning have, frankly, had limited success in preventing forestland parcelization, fragmentation, development or conversion. Forest Inventory data developed by the US Forest Service has shown small but steady declines in total forest cover in New York State over the past decade. High property taxes, demand for forest land for development and the loss of many markets for forest products from managed forests have all contributed to these declines after decades of strong forest acreage and volume growth since the early 1900s. More recently, invasive, exotic insects and diseases have also plagued our forests (including urban and suburban trees and forests), which causes significant tree mortality and subsequent loss of carbon sequestration capability.

With regard to “Stakeholders”, the Draft Plan fails to include forest (wood-using) industries including pulp and paper manufacturers, lumber and veneer mills, furniture manufacturers, wood pellet plants, wood-fired power plants and other wood products manufacturers. This is an important constituency as they provide critical economic incentives to forest owners who sell outputs of sustainable forest management as raw material for these industries. This allows forest owners to pay property taxes, pay for management services, retain their land and return a profit on their investment in holding undeveloped forest land. Another key stakeholder not mentioned is institutional investors in forestland, or “Timber Investment Management Organizations (TIMO’s). This sector has become increasingly significant as most large, industrial forest owners across New York have sold their forestland holdings, which traditionally supplied wood to their mills, as their investment priorities and needs changed.

The Strategies outlined in LU1, Mitigate carbon Emissions by Protection of Forest Lands and LU3, Avoid Agricultural and Forested Land Conversion seem to focus primarily on public land acquisition, without any emphasis on subsequent management. We believe active forest management, where not precluded by

regulation or Constitutional protection, is essential to meeting climate goals by maintaining and increasing the ability of forests to capture and store carbon. Private owners currently hold most of New York State's forest land and currently face many challenges in maintaining and managing their forests. The draft strategies fail to acknowledge the crushing impact forest land taxes have on the ability of private owners to hold on to their forest lands and, often, pass them down to succeeding generations. Promoting use of conservation easements, with sustainable forest management allowances and provisions, should be included under the "land acquisition" strategies. Revisions or re-invention of the Forest Tax Law, as have been discussed and proposed by forest owners, managers and advocates for years, should also be included as a strategy to avoid forest conversion, support forest retention and encourage sustainable management for increased carbon sequestration.