

The Climate Action Council should consider splitting this section in two and dedicating separate discussions for Agriculture and Forestry to allow for a deeper analysis and set of recommendations.

Managing our agricultural emissions and adopting sustainable agricultural practices are critical parts of a credible plan to achieve net-zero GHG emissions for the State.

NY farmers provide valuable ecological services and play an essential role in local food systems and the economy. Meeting CLCPA goals requires investment to make climate-friendly knowledge, technologies, and funding more widely available.

The Agriculture and Forestry Section of the Draft Scoping Plan provides excellent recommendations for preserving forest lands and transforming the way we farm in New York. However, it also has ill-suited recommendations that work against the mandates of the CLCPA and recommendations of the Climate Justice Working Group (CJWG), including building the market for bioenergy and biofuels.

Agriculture:

New York should cease public investments in technologies that enable the accelerating concentration of livestock farms. We must place fees on nitrogen fertilizers to fund farms transitioning to organic systems that reduce upstream methane emissions. Methane emissions from pastured cows generate less than 2% of the amount of methane that anaerobic liquid manure produces, and “dry,” aerobically managed manure only generates about 7% as much methane as anaerobic liquid manure. The scoping plan should include regulatory options, as authorized under the ECL and consistent with the CLCPA, for reducing methane emissions.

Food produced from local sources is nourishment, and a central aspect to food and public health is the availability of fresh, nutrient-dense food. The plan needs to directly address food system resilience in more length and depth, and do so in a way that does not rely on the cost of long-distance transportation. During the pandemic, when global supply could not meet NYS needs, local food systems fed our communities; they were more resilient and nimble in responding to the crisis. Because of this, we must support the ethical and diverse practitioners of NYS local farms and communities.

Sustainable practices must be supported and incentivized, including reduced tillage, crop rotation, cover crops, and smart crop surveillance and management to minimize fertilizers and pesticides.

Organic farming and agroecological principles such as rotational grazing and agroforestry must be incentivized. New York State must fund transformative practices that work upstream of manure storage, and direct Climate Resilient Farming funds towards reducing enteric and manure sources of emissions. Resilient Farming funds should be made available to smaller

operations. Resources, such as peer-to-peer farmer education, about the technological and economic aspects of such a transition are needed.

State policies and programs must be reformed to promote institutional procurement strategies that provide access to local markets for farmers employing soil health and GHG management practices. Payment for ecosystem services programs can incentivize farmers to adopt climate-friendly practices.

New York must ensure continued farmland protection and equitable access to farmland for beginning farmers, women, and BIPOC farmers. Further research and development into alternative feed measures must be supported, along with the collection of locally relevant data on the GHG impacts of farming and the potential for carbon sequestration.

Forestry:

It is imperative that the final version of the scoping plan focus on prioritizing afforestation and forest preservation efforts that provide maximum climate benefit over strategies designed to profit the forestry industry.

Logging activity must follow a sustainable logging plan. New York must prohibit logging for carbon sequestration purposes without proven life cycle analysis that shows that the use of lumber in construction projects leads to lower net GHG emissions than the product it replaces.

The use of wood feedstocks for bioenergy production must be limited or forbidden, as much more suitable feedstocks exist.