



New York Corn & Soybean Growers Association Comments on the Climate Action Council's Draft Scoping Plan

New York Corn & Soybean Growers Association (NYCSGA) is a grassroots organization representing more than 300 growers and agribusiness professionals across New York State. With more than 1,000,000 acres of corn and 315,000 acres of soybeans planted annually, these combined agricultural commodities make up the highest agricultural land base in the state. The Association works to develop and expand markets, educate members and consumers, and enhance public policy for corn and soybean growers. Additionally, the Association sponsors research on corn and soybean production, utilization, and marketing; and hosts educational programs on management, production, and marketing. On behalf of our members, NYCSGA respectfully offers the following comments on the Climate Action Council's (CAC) Draft Scoping Plan ("The Plan").

The implementation of Climate Leadership and Community Protection Act (CLCPA) is an important opportunity for New York's agricultural sector. The Final Scoping Plan will not only act as a foundation for decision-makers to advance policy in the coming years, but will also send a signal to farmers and markets as to where the future of agriculture in New York is heading. As stewards of the land, our members understand the important relationship between the long-term health of the environment and the sustainability of our businesses. The Plan overall offers many positive recommendations that will create a pathway forward to reach the statutorily required goals of the CLCPA while bolstering the success of corn and soybean growers. We look forward to the release of the Final Scoping Plan and the opportunities it may present for corn and soybean farmers across the state.

Agriculture and Land Use Recommendations

NYCSGA appreciates that the Plan recognizes the agricultural sector's potential to serve as a critical climate solution. Climate smart practices, such as advanced nutrient management, cover cropping and reduced tillage provide climate benefits through increased carbon sequestration and emissions reductions. We encourage the State to continue to incentivize these practices through the expansion of existing programs and/or creation of new ones, where necessary. The further adoption of these practices will require various supportive actions, such as expanded funding and technical assistance, expanded stakeholder outreach and collaboration, and increased capacity of implementation services. In order to maximize the adoption of climate-friendly practices in a sustainable manner, the State should continue to consult with the agricultural community as it looks for areas of expansion. Furthermore, while regulatory action at times may potentially be considered, the State should be cautious of taking broad regulatory action without first incentivizing more comprehensive adoption of these practices throughout the agricultural sector.

Specifically, research is one area that should continue to be used to support new innovative practices. For example, since 2014, New York State has provided funding to NYCSGA for the Corn Research and Education Grant Program. This program has supported over 30 projects which focus on sustainability, soil health and climate change adaptation. Tools developed through this program



have the potential to be adopted by farmers across the state as they strive to be successful in a competitive market with growing challenges. Programs like this yield tremendous benefits despite the comparative cost to the State and have room for expansion in the coming years to fund additional projects which could be used to support the Final Scoping Plan.

The Plan also recognizes that farmers in New York State have already made significant progress with the adoption of climate-friendly practices. Specifically, New York State has comparatively lower NOx emissions than other areas of the United States. Additionally, many corn and soybean growers have adopted cover cropping practices through their own initiatives. These conservation efforts have been aided both directly and indirectly by State-supported research and programs. Yet ultimately, these initiatives rely on the experimentation, problem-solving and expenditures of growers themselves. This dynamic must be considered as the State seeks to expand the adoption of practices while balancing the support and recognition for growers already providing these climate and ecosystem services. Ensuring equity in the benefits derived from programs will be especially important in the development and expansion of agricultural environmental management (AEM) planning along with the establishment of a payment for ecosystem services (PES) program. The Plan rightfully underscores the potential importance that both of these programs may bring. If done properly, there will need to be a comprehensive accounting of existing businesses already utilizing best management practices. Uniform methods of data collection and analysis will have to be developed by the State in partnership with farmers, Soil and Water Conservation Districts (SWCDs), Cornell, and other industry experts. Eventually, thorough plans will have to be developed which should include upfront on-farm piloting with a goal of future integration of other programs where appropriate.

Lastly, with regard to data collection and emissions benchmarking, it is understandable that increased levels of field data will have to be collected in an effort to ensure the sector is moving toward the State's climate goals. It is positive to see the Plan recognize that in order for this to be most successful, significant investments in gathering farm-level data will have to be made. Providing adequate data gathering resources to farmers will ensure accurate and timely data is collected in the most efficient manner. However, we wish to underscore the importance of making sure that the data collection process maintains the privacy and rights of growers. Benchmarking should be done either confidentially or through open reporting with pre-established farmer agreements. Furthermore, while on-farm data will serve to inform the public on the industry's progress toward state climate goals, farmer information should be kept proprietary as necessary. By doing so, growers will continue to maintain a high level of trust that their efforts toward sustainability is the right path forward.

Alternative Fuels

As New York looks to decarbonize its economy, alternative fuels will play a critical role in providing immediate and significant emissions reductions across multiple sectors including transportation and home heating. NYCSGA is strongly supportive of efforts to expand the use of ethanol and biodiesel. Both of these products not only provide immediate emissions reductions necessary to



reach the State's climate goals, but also, they are a foundation to the economic well-being and livelihoods of our growers. Therefore, as the CAC finalizes the Scoping Plan, NYCSGA respectfully encourages the Council to consider the economic impacts that alternative fuel policies will have on growers, their families and local communities who depend on their continued and expanded adoption.

With regard to specific policies, NYCSGA is strongly supportive of the establishment of a clean fuel standard. The CAC should work to include stronger language in the Final Scoping Plan which describes a clear endorsement of this effective policy tool. Multiple other states and jurisdictions have enacted similar policies which have proven to be successful in both addressing air pollution and sustaining critical industries. California's Low-Carbon Fuel Standard is exceeding its target of in-state carbon reduction as the increased demand for feedstock and biofuels is driving producers to provide lower carbon intensity fuels. Also, on a national level, the Renewable Fuel Standard has significantly increased the continued expansion of the biofuels market. Due to the high number of internal combustion vehicles on the road today, it is incumbent to reduce fossil fuel use in those engines as much as possible and as quickly as possible. A clean fuel standard would reduce tailpipe and particulate matter emissions leading to both significant climate benefits as well as reduced health impacts, especially in disadvantaged communities. Therefore, the enactment of a clean fuel standard in New York is a common-sense approach that will yield benefits for in-state corn and soybean growers as well as communities across the state.

Home heating is another area where biofuels can provide significant near-term emissions reductions. New York State already requires the use of heating oil blends starting at 5% this year and increasing to 20% in 2030. The CAC should look to include language which endorses a strengthened requirement to increase blend levels to 50% by 2035. By doing so, it would serve as a cost-competitive recommendation which could provide tangible emissions reductions over the next decade. Multiple other states have seen success in this area which has led to cost-savings, job creation and reduced health impacts. Additionally, this would also be beneficial to low-income customers who cannot afford to transition to alternative heating systems. Therefore, NYCSGA is strongly supportive of initiatives to increase the research, application and expansion of fuel blending in home heating systems.

In closing, thank you for the opportunity to provide comments on the CAC's Draft Scoping Plan. NYCSGA and its members are readily available to answer any questions that will aid in the Council's decision-making process. We thank you for your continued work on so many critical issues and we look forward to the release of the Final Scoping Plan.

Sincerely,

Colleen Klein
Executive Director
NYCSGA