

Sustainable Bethel



On behalf of Sustainable Bethel, thank you for this opportunity to provide comments on the NYS Draft Scoping Plan. This report is stunning in its ambition and scope. It is a detailed roadmap for navigating the global climate crisis and demonstrates New York's commitment to leadership on this issue. It lays out in stark detail exactly what we are facing and how aggressively transitioning to a lower emissions economy will benefit all New Yorkers. Of particular importance is the focus on social justice, pledging as it does to ensure allocation of at least 35%, and preferably 40%, of clean energy and efficiency funding to assist marginalized people who are the most affected by this crisis. We strongly support the Draft Scoping Plan and applaud the time, effort, ambition and vision of the various working groups which contributed to it so as to achieve the goals of New York State's ambitious Climate Leadership and Community Protection Act ("CLCPA").

Sustainable Bethel is the advisory sustainability committee of the Town of Bethel in Sullivan County. The Committee, comprised of Town Board members and community volunteers, has been working since 2013 to promote and support environmental sustainability measures. Our Town was recognized as a Bronze-certified Climate Smart Community in 2018 and is a designated Mid-Hudson NYSEERDA Clean Energy Community. Bethel has approximately 4000 residents and its small municipal staff totaling 21 means that it has no "office of sustainability" or dedicated sustainability personnel. Often, the State's sustainability programs overlook issues that particularly impact small rural municipalities. As such, we urge and recommend, generally, that the Draft Scoping Plan recognize the differences in needs-- and needed solutions --among rural, suburban and urban communities and, wherever possible, specify approaches that may be targeted to the State's hundreds of smaller, rural municipalities. For the Town of Bethel, the "will" is there but the implementation of sustainability initiatives continues to be dependent on the availability of State funding and technical support.

Below are our comments on specific strategy proposals in the **Agricultural and Forestry** Chapter of the Draft Scoping Plan:

"Manure storages have caused the single highest increase in agricultural emissions from the 1990 baseline year to today." Page 209

Comment: Appropriate zoning laws could address this. A farm should not have more animals than the land can support, period. CAFOs and mega dairies, while not the huge problem in NY as they are in other states, should be prohibited. This would eliminate the manure storage problem. Zoning imposes occupancy limits for people to protect public health. We should have similar standards for livestock and poultry. Particularly since our farm animals have been selectively

bred for genetic uniformity, they are extremely vulnerable to pandemics, such as the current bird flu. Diversity of crop and animal species should be encouraged and carbon neutral sized operations should be required.

“Methane is produced as part of normal digestive process in animals, especially ruminants. During digestion, microbes present in the animal’s digestive system ferment feed consumed by the animal. This microbial fermentation process, referred to as enteric fermentation, produces methane as a byproduct, which can be exhaled or eructed by the animal. Although methane from feed digestion represents the highest percentage of agricultural emissions, dairy and other livestock farms have improved feed efficiency, reducing methane emissions per unit of milk and other products since the 1990 baseline.” Page 211

Comment: The root of the problem here is feeding grains to ruminants. The science is clear: cows are healthier when they are grass fed, and they produce far less “enteric emissions”. Grass fed beef and dairy products are significantly healthier for people and for the environment. This is a no brainer. We need to feed our cows grass. Social justice is commendably a high priority of this report and we would suggest expanding that mandate to include our farm animals, particularly since elevating their welfare would also secure public health and climate resiliency benefits.

To increase sustainability, climate resilience and genetic diversity, small family farms should be incentivized and encouraged, with a focus on carbon sequestration production methods and small holdings of genetically diverse heritage breed livestock. We also need to invest in processing infrastructure to support small farms. Milk should not be shipped in tankers to faraway plants for bottling. Local farmers should not need to transport animals more than two hours away for processing. This is a huge obstacle for small farmers and must be addressed. To the extent possible, we should not import agricultural products that can be produced in NY. Policy should incentivize keeping food networks local, reducing transportation and refrigeration costs and emissions.

“To reduce methane and nitrous oxide emissions while achieving desired ruminant growth and lactation goals, this strategy requires the evaluation of new processes, technologies, costs, and returns; demands sustained adaptive management by farmers and advisors, flattening the learning curve by farmers, advisors, and the feed industry; filling gaps in applied research; overcoming weather and market disruptions that can lower performance (producing lower quality forage). This strategy acknowledges that additional methane emission reduction may be realized from feed additives developed in the future and supports research to evaluate their potential.” Page 212.

Comment: This statement is on the right track but again, we needn’t reinvent the wheel. Cows evolved to eat grass. They did not produce large amounts of methane until we started feeding them corn.

“Increase perennial plant systems: AGM and SWCC should support converting annual cropland to perennial hay land/pasture and where appropriate (such as steep slopes and highly erodible lands). This is a current effort supported through the State’s AgNPS and CRF programs.” Page 217

Comment: This is an excellent idea and should be pursued over research into other possible feedstuffs for cattle. Grass is clearly the optimum choice.

“Of New York’s forests 73%, or 13.7 million acres, are owned by private landowners.” Page 203

Comment: Why not also incentivize forestry conservation for landowners <15 acres? Given the large proportion of privately held forests, it seems imperative to include as many landowners as possible. There should be a way for small forest owners to connect with others to create larger blocks of stewarded lands, and a mechanism to assist them with expertise on responsible management. (See also the related comment on providing a “first right of refusal” to local governments regarding the sale of privately owned forests within their municipalities.)

“WPDC should develop and support workforce development and training programs for the forest sector, including incorporating forest carbon management into curriculums at the high school (such as the Boards of Cooperative Education Services) and college level and supporting existing training apprenticeship programs for careers in forestry and the forest product supply chain.” Page 225

Comment: We are strongly supportive of educational efforts directed towards students, as in the Strategy Component above. Climate change is an existential threat which requires extraordinary measures. College students pursuing a degree in education also need to be prepared to teach their future students about climate change. Kids are more receptive to learning than adults and often are also great teachers, taking information back home to their families. Climate education in schools is imperative. Every aspect of resiliency laid out in this plan needs to be taught in our schools. In 2020, New Jersey became the first state to implement climate change education across the entirety of its K-12 curriculum. New York should immediately do the same.

Thank you for the opportunity to comment on the NYS Draft Scoping Plan.

Sincerely,

Jennifer Young
Sustainable Bethel