Scoping Plan Chapter 15 Comments - Coddington

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**Introduction:** Nicola Coddington, Irvington NY. Former Mayor and Trustee, Village of Irvington. Current Chair of Irvington Woods Committee; member of Irvington Climate Smart Communities Task Force, Irvington Green Policy Task Force, and Irvington Open Space Advisory Committee; member of EnergySmart Homes Rivertowns volunteer team. Co-coordinator, Planting Westchester, a project of Westchester County (www.PlantingWestchester.org). Member, Climate Reality Project. Past member of several Climate Change task forces as well as Gov. Paterson's Renewable Energy Task Force (2007-8). Nearly twenty years of working as independent consultant/community educator in energy conservation/efficiency and renewable energy (including Solarize Westchester and HeatSmart programs).

**Comments:** In my opinion, both sections of this chapter would benefit from additional analysis and detail; perhaps consider dividing it into two separate chapters.

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--AND can provide other co-benefits such as an increased supply of healthy, local food from nutrient-rich soil.

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:**

I have been convinced by the educational efforts of organizations such as Regeneration International (www.RegenerationInternational.org) and others of the vast potential of regenerative agriculture practices to heal our soil and capture carbon. These practices should be more fully explored and supported by the Council's plan.

Support must be given to NY's farmers to learn about and implement sustainable, regenerative agriculture practices AS WELL AS supplementary technologies such as agrovoltaics that can help farmers be fully profitable. The busy, work-filled days of farmers often do not allow them time to explore new techniques that may be available.

More support should be given to small urban farms and community gardens. For example, urban centers could be encouraged to establish community garden networks to connect, educate and empower these local food sources that have multiple co-benefits; state funding would be helpful.

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:**

In section AF5, "Support Local Communities in Forest Protection and Management," I support your recommendations but urge you to go even further. In our experience in the Village of Irvington, with both our street trees and our 400-acre Irvington Woods, we have seen the need for a comprehensive systems approach that gets everyone in the community on the same page about the benefits of trees and the actual practices needed to plant, protect and sustain them. We have benefited from DEC grants, but more state support is needed for more communities. Not just money, but educational and hands-on help--particularly for lower-income communities that historically have fewer urban trees. And not just money for seedlings for planting, but for a systems approach to the proper selection, planting, and ongoing maintenance. It is my observation that enthusiastic tree-planting drives often end in the failure and loss of many seedlings, with accompanying community demotivation.

We see the major threats to our existing trees as: damage from invasive insects and invasive plants (such as vines), deer browse, and poor landscaping practices (weed whacking, volcano mulches, etc.). NYS could do even more through its existing programs and partners (such as Cornell Cooperative Extension?) to educate landscapers and the public about proper tree selection and care. More could also be done by the state to help communities manage deer overpopulation, especially in suburban areas where the seed bank has been decimated by years of overbrowsing. More support could go to communities to help them learn about and fight invasive plants. Existing resources such as PRISM and local municipal volunteer "vine squads" could be leveraged to share and replicate best practices.

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.

**THANK YOU FOR YOUR HARD WORK!** Please feel free to contact me with any questions.