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State Energy Plan Comments

NYSERDA

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RE: NYFOA comments on New York Draft Energy Plan of 2025

The New York Forest Owners Association (NYFOA) is glad to have the opportunity to comment on the New York Draft Energy Plan of 2025. The forests and woodlands of New York cover 19 million acres, 63% of the land of the State and occur in every county. Three quarters of these forests are in private ownership with over 11 million acres held by a wide variety of family forest owners in individual properties ranges from a few acres to more than a thousand. The average size of ownership is 50 acres. These forests and woodlands provide wood, recreation, wildlife habitat, clean water, carbon removal from the atmosphere and lower greenhouse gas emissions. New York's forest products industry employs 50 thousand people with annual shipments of \$10 billion. Forest-based recreation activity adds another \$8 billion. (www.esfpa.org/forestry-facts). Sustainable timber harvesting is essential to the continued economic and environmental benefits of our forests.

The Draft 2025 New York Energy Plan provides policy directions and recommendations for delivering abundant, reliable, resilient, and clean energy to all New York. The forests and woodlands of New York are important in this process. There are four important topics to emphasize in the plan concerning forests: Maintaining productive forests, Productive use of low-grade woody material for bio feedstock, Improving local building and land use codes, Strengthening rural electric grids.

Maintaining productive forests - It is well known and understood that the forests of New York are our principal way of capturing carbon dioxide and producing oxygen. The need to maintain productive forests has been stressed in previous documents. Installation of large solar and wind farms is a major part of the Energy Plan. Many of the largest sites for these facilities are in rural, often highly forested areas. (See for example, Figure 19 of the Electricity Chapter on page 37.) Care must be taken to avoid or at least minimize the loss of forest land. It will be a net eco-system loss if a forest that is sequestering carbon is replaced by a solar farm that produces electricity. In addition to the detriments of opening forestland to this development, there will be an increase in invasive species populations and loss of wildlife habitat. There is little mention of it in this plan. (For example, on page 74 of the Draft Summary Plan, the Environmental Impacts statement makes no mention of the impact of possible loss of forest land.)

Productive use of low-grade material – There are three opportunities that should be explored: manufacturing residuals, forest improvement practices, land clearing.

1. The forest products industry, like most other manufacturing processes, produces residual material (bark, trimmings, edge pieces of wood, etc.). The sector also requires use of steam and electric power in various operations, especially kiln drying green lumber. Onsite combustion of these residuals for heat generation decreases waste and helps to ease the overall demand on the electric grid.
2. Sustainable forest management aims to channel the growth potential of a forest site to the species, sizes, and quality of trees that will produce the best combination of goods and services in the long run. This often means removing vegetation (trees) that are competing with more desirable trees. This principle holds true for whatever the desired result; be it timber, carbon storage, wildlife habitat, or



other forest values. With improved markets for this low-grade material, an important supply of biofuel can be sustainably produced. Other products are also possible and should be investigated.

3. Clearing of forest land for conversion to other uses, especially wind and solar farms or rights-of-way transmission lines, should require that woody material produced is productively used in some form such as wood chips. Public agencies in cooperation with private firms and organizations must work together to develop workable regulations. The Wood Products Development Council is a way to achieve this cooperative effort.

Improving local building and land use codes – Page 46 of the Summary Plan Draft states it is very important to integrate renewable energy into local land use planning. Two points relate to forests:

1. Steel and concrete, the principal materials used in all buildings, except single-family home construction, in New York, place huge demands on fossil fuels in production. Technology is developing that allows substitution of engineered wood products for much of the steel and concrete used in construction projects. This not only reduces the carbon footprint but also helps in long-term storage of embedded carbon in the durable wood products used in construction.
2. The siting of solar and wind and solar farms should recognize the need to maintain productive forest lands. Local land use zoning and other regulations should guide these energy facilities to first use otherwise vacant and unproductive sites such as old excavation sites for sand, gravel, etc., abandoned landfill or other brownfield sites, and minimize the conversion of forests or high value agriculture soils to energy sites.

Strengthening rural electric grids – Many of the owners of the 11 million acres of private family-owned forest land live in rural areas. The operations of timber harvesting are primarily in rural areas. Efficient and ecologically sustainable timber harvesting depends on highly mechanized equipment but without better access to charging stations, or better technology in battery storage and transfer, it will be impossible to meet various regulations for clean energy use. The Draft Energy Plan points out (page 24 of the draft Summary Plan) that infrastructures for electric grid improvement must be accomplished in rural areas. This is necessary if homeowners in these areas are to shift to more electric-based heating systems. In addition, electric charging stations are virtually nonexistent in rural areas.

Public agencies (especially DEC, NYSERDA, and PSC), the many private forest products firms, and organizations (especially the Empire State Forest Products Association and New York Forest Owners Association) must work cooperatively to ensure sound policy and programs for the future contributions of New York's forest and woodlands to meeting energy and other social goals. NYFOA is ready and willing to assist in developing the final 2025 Energy Plan.

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