

Thank you for the opportunity to comment on New York's draft scoping plan to achieve the goals of the Climate Leadership and Community Protection Act. I am grateful to the work of the Climate Action Council on creating this document, which includes many strong steps towards addressing climate change and places New York as a leader on climate. Addressing the agriculture & forestry sector, which accounts for 6% of New York's greenhouse gas emissions, requires significantly strengthening mitigation in agriculture. The final scoping plan must:

- **Incentivize a shift away from nitrogen fertilizer use.** Nitrogen fertilizers produce potent greenhouse gas emissions in the form of nitrous oxide (N₂O) that must be comprehensively addressed.
- **Ensure that carbon sinks from improved forestry and soil management are *guaranteed* to achieve the >60 million metric tons of carbon dioxide sequestration required to meet New York's commitment to net-zero greenhouse gas emissions by 2050.**
- **Incentivize a shift towards climate-friendly animal feeding practices, including the use of dietary supplements for ruminant livestock that may significantly reduce methane emissions.**
- **Regulate Concentrated Animal Feeding Operations and their negative environmental impacts.**
- **Develop a plan to address emissions from tractors and farm equipment.** While emissions from tractors and farm equipment make up a small percentage of emissions from agriculture, this plan should include a practical pathway to decarbonize farm equipment that is essential to New York's food production while supporting New York farmers in this fuel transition.