

BUILDINGS

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. To address the building sector, which accounts for 32% of New York State's emissions, New York must rapidly adopt standards for NO NEW FOSSIL FUELS in buildings and strengthen assistance programs, especially for low-to-moderate income (LMI) households and those in Disadvantaged Communities, to electrify and receive the benefits of cleaner air that occur when we stop combusting fossil fuels. To ensure a livable future for all New York residents, the final scoping plan must:

- **Ban all fossil fuel equipment in new buildings.** All-electric building codes should adhere to the draft scoping plan's proposed 2024/2027 timeline or earlier, requiring all-electric new residential/mixed-use buildings by 2024 and all-electric standards for new commercial buildings by 2027. We must not lock in additional fossil fuel infrastructure for decades by postponing all-electric building codes any longer.
- **Ban new gas hookups.** Ceasing the installation of gas hookups in new buildings is essential for phasing in more sustainable technologies. According to Earthjustice, 70% of New York City's natural gas emissions stem from buildings.
- **Implement all-electric appliance standards.** Electric appliance standards should be accompanied by financial assistance for LMI households to increase affordability.
- **Dedicate at least \$1 billion per year to assist low to moderate income households with electrification.** Electrification upgrades can have high upfront costs so it is extremely important to dedicate public funding to support electrification for low to moderate income households. Not only does electrification significantly reduce household GHG emissions, it also results in substantial energy bill savings that could greatly benefit LMI households.
- **Prohibit state and utility marketing of fossil fuels.** New York and its utilities must serve the interests of New York residents by ceasing to promote fossil fuels. Marketing should instead focus on necessary electric technologies such as ground- and air-source heat pumps that will keep New Yorkers reliably warm through the winter without harming our climate and livelihoods.
- **End fossil fuel expansion.** The state must not grant new gas permits, nor require that utilities provide customers with fossil fuel service. New York must align utility regulations with stringent climate goals that achieve net-zero emissions by 2050.

- **Include the Gas Transition and Affordable Energy Act (S.8198)** to ensure equitable and affordable access to electricity for New York residents while necessarily aligning utility regulations with New York's commitments under the Climate Act.
- **Require leak detection in supermarkets to prevent powerful greenhouse gases from escaping into the atmosphere, and create a cash-for-clunkers program to ensure refrigerants from old appliances are safely recovered at their end of life.** Establish dedicated funding for grocery stores in disadvantaged communities to meet these requirements, and fully fund DEC resources to oversee and implement this requirement.