

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.

However, even if we adopt all of the sector-based strategies within the draft scoping plan, we will still fall short of New York's commitments under the Climate Act unless New York implements a comprehensive, economy-wide strategy to make up the shortfall. The Scoping Plan asks for public input on such strategies which must be designed to avoid burdening low- to moderate-income households and Disadvantaged Communities.

The final Scoping Plan must:

- **Price carbon, using a fee and dividend structure to effectively internalize the costs of greenhouse gas emissions across sectors.** It is most fair for a carbon price to start low and gradually rise each year, and must apply to all sectors of the economy. New York's current strategy, under the Regional Greenhouse Gas Initiative (RGGI), only prices the electricity sector and impedes the electrification of buildings and transit.
- **Adhere to the most stringent greenhouse gas reduction scenario (Scenario 4) in the draft scoping plan.** Climate change is a personal issue for each and every one of us. A scenario that gambles our livable futures away through reliance on highly uncertain "negative emissions technologies" and anything less than rapid and complete decarbonization of all emitting sectors acts in direct disservice to all New Yorkers. New York must lead on climate with bold commitments and relentless efforts to achieve zero emissions fully and equitably by 2050.