

I am taking this opportunity to comment my preference of scenario pathways that NYS will take to address climate change. I would prefer mitigation scenario 4.

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.

WASTE

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 waste sector, which accounts for 12% of New York's greenhouse gas emissions, New York must enact policy immediately to reduce landfill waste, divert organic waste, and encourage sustainable use of materials. These policies must equitably serve New York residents. The final scoping plan must:

- **Create a surcharge on landfill waste.** The amendment and expansion of the Food Donation and Food Scraps Recycling Law tackles the organic waste issue at its financial core- that it is relatively cheaper to dispose of organic waste in the landfill than it

is to recycle. By imposing a surcharge on landfill waste (making it more expensive) to financially support reduction, reuse and recycling, the price of disposing waste in landfills will be made closer to its real environmental, societal and economic cost.

- **Implement more stringent organics recycling and food donation programs for major food generators.** Stronger programs on major food generators (hospitals, universities, restaurants and supermarkets, etc) is a very efficient way to reduce and recycle organic waste. In addition to targeting the bulk of organic waste in the state, this will also set an example for smaller food generators as well as individuals and households.
- **Expand organics collection programs to multi-family and public housing.** Multi-family and public housing make up a relatively large portion of communities in New York, making it so that they can possibly collectively generate large amounts of organic waste that may be sent to landfills instead of recycled. Thus, expanding outreach and education to this population has potential in inducing effective shifts in organic waste divestment from landfills to organic waste collections. This is also significant in inviting communities who may be disproportionately affected by environmental injustice issues to be included in solutions that may have effects on their lives more strongly than others.
- **Immediately implement “by request only” single-use materials in restaurants.** A statewide “by request only” policy must be administered for single-use items with a requirement of reusable or refillable options. Single-use items, such as utensils and dishware in restaurants, can be phased out in favor of multi-use items that will reduce landfill waste.
- **Rapidly end single-use packaging.** Single-use packaging must be phased out and eliminated in retail stores and other locations, as it contributes to landfill waste consisting largely of non-recyclable material.
- **Expand container deposit programs and incentives for proper recycling.** Container deposits must be increased throughout the state. Increased container deposits incentives the collection and

recycling of recyclable materials through a comparatively streamlined process.

- **Create a textile waste reduction program.** Not only would a textile waste reduction program reduce methane and CO2 emissions, but it would also reduce both the water waste and water contamination that goes into textile production. This initiative would, overall, promote a sustainable mindset in the textile industry, encouraging the recycling of products created.

CROSS SECTOR

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.