

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 transportation sector, which accounts for 28% of New York's greenhouse gas emissions, New York must advance transportation electrification and the expansion of reliable, electric public transport options rapidly and equitably. The final scoping plan must:

- **Introduce a feebate for zero-emission vehicles.** Since transportation emissions are so high, it is important to promote the use of electric vehicles. A feebate program for zero-emission vehicles would be a great way to incentivize the purchase of ZEVs and make them more affordable for LMI customers. Transportation is a constant in this world, thus it is necessary to create a feasible plan that tackles transportation head-on.
- **Expand a feebate program beyond vehicle purchases to include zero-emission vehicle leases.** We need full transportation electrification, which includes vehicle leases. Additionally, making ZEVs more affordable to rent through a feebate could increase familiarity with ZEVs and enable future purchase.
- **Allow zero-emission vehicle manufacturers to sell directly to consumers.** New York must remove all possible barriers for consumers to make climate-friendly transportation choices. This means allowing direct sales from manufacturers to consumers to decrease costs while increasing consumer choice.
- **Accelerate fast-charger deployment across the state.** New York can only achieve its Climate Act commitments if New Yorkers can get around the state reliably and emissions-free. New York must accelerate charger deployment to show that electric transportation will be dependable in every part of the state.
- **Achieve a fully-electric state fleet by 2030.** New York must lead the way in adopting zero-emissions vehicles by accelerating its transition to a fully electric fleet by five years, committing to a zero-emissions fleet by 2030.
- **Make a comprehensive plan for developing fully electric, extensive, and accessible public transportation.** New York must give heightened consideration to public transit systems within the state, which can help move more people with greater efficiency. We need full electrification of an expansive and physically accessible public transit system helping people connect to their work, their communities, and all New York State has to offer.
- **Address public transit beyond the New York City metro area to include expanded and electrified upstate transportation.** The Climate Act offers us the opportunity to open doors for New Yorkers statewide. New York should develop a plan to expand and electrify public transportation to help upstate New York residents access economic,

social, and cultural opportunities within their communities and across the state regardless of vehicle status.

- **Address tri-state commuting in public transit plans by investing in rail and bus systems; divert funding away from road infrastructure.** New York must consider community transportation needs by focusing on the larger tri-state area. New York brings in a lot of commuters, especially from New Jersey, and commuters should factor into the New York community. Commuters currently rely on single-occupancy vehicles, MTA, NJT, or coach buses into Port Authority, which are often unreliable and create a miserable commuting experience. New York must invest in public transit by improving user experience through increased frequency of service, more stop locations, and better communications, which will help reduce reliance on personal vehicles and thus reduce carbon emissions