LAND USE, AGRICULTURE & FORESTRY

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:

- Regulate nitrogen fertilizer use. Nitrogen fertilizers produce potent greenhouse gas emissions in the form of nitrous oxide (N2O) that must be regulated.
- Develop a plan to address emissions from tractors and farm equipment. 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.
- Regulate Concentrated Animal Feeding Operations and their negative environmental impacts. The plan should additionally incentivize a shift towards climate-friendly feeding practices, including use of dietary supplements for ruminant livestock that may significantly reduce methane emissions.