From: Leslie Graham
To: erda.sm.scopingplan
Subject: Public Comment on NY"s Draft Scoping Plan: Buildings Sector
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Thank you for this opportunity to provide comments on the draft scoping plan. As required by New York's nation-leading climate law, the CLCPA, climate and environmental justice must be the driver of the outcomes of this scoping plan. To achieve this, please ensure that the following recommendations on the Waste Sector are included in the final draft:

While the waste section of the scoping plan includes serviceable recommendations for waste management, it also promotes problematic strategies opposed by the Climate Justice Working Group, various environmental organizations, and some green groups. These include capturing and "beneficially" reusing fugitive biogas, creating markets for biogas utilization, and increasing utilization of biogas via large-scale, industrial anaerobic digestion. These recommendations are not consistent with the Climate Leadership and Community Protection Act (CLCPA) or the principles of environmental justice.

New York's mismanagement of generated waste accounts for approximately 12% of statewide emissions with landfills accounting for the vast majority. Other waste management practices, including anaerobic digesters, also contribute to the statewide emissions, largely in the form of fugitive methane leaks. The utilization of recycled materials can markedly reduce waste volume and associated emissions. For instance, the use of recycled paper products not only reduces demand for "virgin timber" but also reduces the number of trees that could be utilized as natural sequestering of emissions. Reduction and increased management of waste in disadvantaged and other environmental justice communities will be key in reducing disproportionate exposure to emissions and other safety risks including, but not limited to, truck traffic.

The section also mentions the need for new approaches to food scraps—some that can be separated and utilized as food sources for indigent folks in lieu of sending them to landfills where they contribute to emission. A combination of incentives and legislation, such as Extended Polluter Responsibility (EPR), can assist with making such approaches a reality.

Rethinking and redesigning waste systems is vital to a transformative outcome. Waste reduction and local scale diversion practices must meet the greater ambition in reducing emissions.

REGARDING PUBLIC HEALTH

The waste sector of the scoping plan recognizes that reducing the volume of material handled and capturing methane reduces odors that significantly impact the quality of life for affected communities and pose potential health impacts. The chapter calls for the development of sophisticated programs that transfer excess edible foods to local food banks and other programs designed to feed the hungry. In the public and private sectors, we must promote well-paying, safe, and green jobs in waste management, with a specific focus on the employment of members of marginalized communities in efforts to construct sustainable

facilities. Marginalized workers should also be prioritized in other roles (management, administration, composting, transportation, sorting, etc.) However, this section should also include a specific focus on how these measures positively contribute to waste reduction as well as ratify and implement the tracking of polluter responsibility to continue positive momentum and account for negative health impacts.

Sincerely,

Leslie Graham