From: Amanda Cedrone
To: erda.sm.scopingplan
Subject: Waste Chapter Comments
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Dear Climate Action Council:

I urge the Climate Action Council to revise the Waste Chapter of the Draft Scoping Plan to incorporate the comments submitted by Energy Justice Network, Clean Air Action Network of Glens Falls, Grassroots Environmental Education, and Westchester Alliance for Sustainable Solutions.

Incineration (and landfilling toxic ash) is twice as bad for the climate as landfilling waste directly. When factoring in the many other air pollutants from trash incineration, burning waste is more than three times as bad as landfilling for human health and the environment. However, the Draft Scoping Plan's Waste Chapter would focus on landfills being a problem but perpetuates the idea that incineration is preferable.

New York's trash incinerators are nearly twice as bad as coal for the climate. In 2011, looking at other pollutants, NY DEC found that the state's eight coal power plants (all now closed) are far dirtier than the ten trash incinerators that all still remain. It's time to put this toxic and climate changing industry to rest.

The Climate Plan must prioritize ending incineration, which is clasified as "unacceptable" in a Zero Waste system. The Plan must also push hard to implement the many solutions that will reduce waste and its many climate and health impacts.

New York is #1 in trash incinerators, #1 in sewage sludge incinerators, and is home to the Norlite aggregate kiln that burns hazardous waste plus multiple cement kilns and paper mills that have tried to burn tires and other waste. The Waste Chapter addresses some waste streams other than trash, but doesn't always get it right. For example, toxic sewage sludge does not belong on farm fields, a practice that Maine just banned due to long-term toxic contamination from PFAS and other contaminants.

Please carefully review these comments and make them part of the Scoping Plan so that we can transition our state to a Zero Waste system that is as protective as possible of public health, environmental justice, climate, and the environment generally.

Sincerely,

Amanda Cedrone
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