

CJWG Feedback Documented in Draft Scoping Plan for further Discussion

Chapter	Topic (Location in Draft Scoping Plan)	CJWG input as reflected in the Draft Scoping Plan	Draft Scoping Plan recommendations
Transportation	Light-Duty ZEV Adoption (p. 103)	<p>The CJWG enthusiastically encourages a rapid transition to ZEVs, although it cautioned that focusing on providing access to transit and lower-cost options for transportation, rather than just personal vehicles, is critical for LMI New Yorkers. The CJWG also expressed concern about investment in EVs leaving the State. Of course, most of the billions of dollars that New Yorkers spend on petroleum-based fuels each year leaves New York; accordingly, the State should continue supporting the development of businesses in the ZEV supply chain to ensure that the ZEV transition is economic benefits the State’s residents economically.</p>	<p>The Draft Scoping Plan recommends a suite of regulatory- and incentive-based mechanisms to accelerate light duty ZEV adoption. The includes the adoption of California's Advanced Clean Cars 2 Regulations (which are expected to require 100% light-duty ZEV sales by 2035) and enhanced ZEV purchase incentives such a 'feebate' program along with enhanced incentives for LMI customers. Additional recommendations include reducing barriers to both sales and charging and fueling infrastructure through increased awareness and investments, changing the design of utility rates, and setting State fleet procurement targets.</p>
Transportation	Adoption of Zero-Emission Trucks, Buses, and Non-road Equipment (p. 105)	<p>Support rapid transition to MHD ZEVs. Prioritize deployment in communities overburdened with air pollution.</p>	<p>The Draft Scoping Plan calls for the adoption of MHD ZEV sales requirements and clean fleet regulations. It calls for prioritizing MHD ZEV incentives in air pollution-overburdened communities for vehicles such as port equipment, refuse trucks, local delivery vehicles, construction equipment, and both transit and school buses and an accelerated transition of the State’s fleet vehicles to ZEVs.</p>
Transportation	Community-Based Service Enhancements (p. 107)	<p>Provide more detail on what specific public transportation enhancements were proposed and how enhancements would be identified and accomplished. The CJWG emphasized the need to think beyond traditional urban public transit and enhance inter-regional rail transportation.</p>	<p>The Draft Scoping Plan recommends that the State should work with communities and service providers to design strategies that increase utilization of public transportation alternatives. Public Transportation service enhancements are intended to be further informed through community-based discussions. For example, availability/accessibility may refer to an increase of service hours/frequency; an increase in routes; and/or an increase in the number of stops along a route. It is anticipated that a combination of approaches will be required in most communities.</p>

Transportation	Customer Convenience and Service Connectivity (p. 108)	Support increased investments in enhanced public transportation alternatives; doing so creates jobs in local communities offering employment opportunity for disadvantaged workers. Incentivize hiring of disadvantaged workers in transit manufacturing by enabling companies to get a credit for setting aside a certain proportion of their workforce for hiring them.	The Draft Scoping Plan calls for the State to facilitate the development and implementation of strategies for making public transportation easier to use. This includes working with the public and private sector on a simplified and integrated statewide fare media and deploying new phone-based applications technologies that makes public transportation more logical and easier to navigate. The Draft Scoping Plan also calls for increased investment in additional modes of transportation that support access to transit, such as bike-sharing and other first mile/last mile solutions that connect more users to transit.
Transportation	Expanding the Availability of Low-Carbon Transportation Alternatives (p.114)	The CJWG has been supportive of the expansion of low-carbon transportation options accessible to underserved communities, a key element of this strategy.	As part of future investments, the Draft Scoping Plan recommends that agencies and authorities should be required to prioritize low- and zero-emission transportation infrastructure in all activities, where feasible. Strategies identified include: funding low emissions zones and car-free streets, funding mobility options that serve employment and population centers, encourage and incentivizes businesses to site in areas served by transit and other mobility alternatives and support employees' use of such services. The scoping plan also recommends amendment of the smart growth public infrastructure act to more effectively avoid new State infrastructure spending that would promote sprawl and define and prioritize priority development areas, such as TOD. Since no two communities are alike, these strategies require localized community-based discussions to identify appropriate mitigating measures.
Transportation	TCI (pp. 116, 257)	Oppose participation in the TCI program based on its position that such programs do not guarantee reductions at individual facilities, raising the potential for pollution hotspots. Some of those stakeholders recommend instead proposed legislation that would adopt an economy-wide carbon price.	The Draft Scoping Plan does not recommend TCI participation but instead defers consideration of economywide market-based programs, including cap-and-invest or carbon pricing, to the Final Scoping Plan. The Draft also acknowledges that the criticism that cap-and-invest programs don't guarantee reductions at individual facilities is equally applicable to carbon fees or taxes, which would not impose emission limits on individual facilities or on statewide emissions overall.

Transportation	Unlock Private Financing (p. 117)	Support measures to accelerate truck and bus electrification and provide financing opportunities to those who generally lack access to affordable capital.	The Draft Scoping Plan identifies various financing strategies including first loss protection, expanding the mission of the Green Bank and undertaking fleet mobility studies.
Transportation	Lower Carbon Renewable Fuels (p. 96, 118)	The CJWG opposed policies supporting renewable fuels on the grounds that they still release harmful air pollutants, particularly in areas overburdened with diesel emissions, and that the State should focus instead on expeditiously electrifying vehicles and the use of hydrogen fuel cells. Development of these policies would need to be mindful of the CJWG's admonition to avoid fuel policies that extend reliance on fossil fuel infrastructure or allow emissions from fuel combustion to continue to disproportionately impact Disadvantaged Communities.	Two of the three scenarios in the integration analysis of the Draft Scoping Plan rely on increased use of alternative, lower-GHG fuels to reduce emissions as the expedited transition to electrification proceeds. The Draft recommends consideration of a clean fuel standard that would stimulate increased use of fuels with lower GHG and PM emissions than fossil fuels, including electricity. DEC could structure the clean fuel standard to reward public transportation providers statewide for emission reductions from electrified transit, providing them with resources to accelerate zero-emission rollingstock and infrastructure enhancements.
Transportation	Mobility-Oriented Development (p. 111)	The CJWG has been supportive of the expansion of low-cost transportation options accessible to underserved communities, a key element of MOD.	The Draft Scoping Plan recommends establishing a holistically designed strategy that would coordinate investment in MOD, tie incentives for business development to mobility access and affordability, revise design manuals for local govts. and developers to reimagine MOD, and designate priority development areas to make it easier to facilitate low-carbon transportation modes.
Transportation	Smart Growth Public Education and Awareness (p. 113)	The CJWG has been supportive of smart growth and the many benefits that flow from this strategy. The CJWG recognizes that these types of projects require community buy-in, which only comes through greater public education and awareness.	The Draft Scoping Plan calls for a strategy for the State to define the benefits of Smart Growth through producing research and materials that demonstrate links between planning and transportation in NY, including impacts on local finances and equity, and to conduct an expansive, multi-dimensional grass-roots public education campaign to increase awareness on the interconnectedness of smart growth, housing justice, and sustainability.
Land Use	Mitigate Carbon Emissions by Protection of Forest Lands (p. 276)	Comments from the CJWG were supportive overall of the strategies listed below for mitigating carbon emissions by the protection of forest lands.	The Draft Scoping Plan in the Land Use chapter describes a number of key strategies for protecting forest lands from conversion to a non-forest use. These strategies are found on pages 276 and 277 and focus on a keep forests as forest law, and supporting both municipal and state land acquisition.

Land Use	Afforestation and Reforestation (p. 278)	The CJWG feedback was supportive overall of the strategies listed below for the Afforestation and Reforestation strategy.	The Draft Scoping Plan (p. 279) identifies a number of key strategies for increasing afforestation and reforestation across natural working lands as a means for increasing sequestration statewide. These strategies include supporting the Saratoga Tree nursery, improving funding to tree planting grant programs, prioritization of planting sites using remote technology, and creating a NY Tree Corps to conduct extensive afforestation efforts.
Land Use	Smart Growth (pp. 292-301)	To ensure the smart growth is equitable, the CJWG suggested programs to meaningfully engage communities in planning and implementation, and prioritizing investments in EJ areas.	The Draft Scoping Plan includes several key recommendations to support equity in land use planning and development (pp. 295-297). Specific recommendations include model local laws for inclusionary zoning, providing resources to community land trusts and land banks and inclusive zoning that promotes mixed-income affordable housing and community centered ownership models.
Land Use	Accelerate Transit-Oriented Development (p.299)	The CJWG recommends the State to establish a clear definition of GEIS to ensure it doesn't oblivate municipal land review requirements	The Draft Scoping Plan includes a strategy to provide state support to municipalities to complete GEISs to TOD zoning and projects (p.300) in order to facilitate an efficient local review process for TODs that are consistent with local and use regulation but use of a GEIS does not reduce or oblivate municipal land review requirements.
Buildings	Align Energy Price Signals with Policy Goals (p. 139)	The CJWG called for a more expansive set of actions related to consumer protection than are proposed, including a "Utility customer bill of rights" that would include a safety net style guarantee of renewable energy to every household.	The Draft Scoping Plan recommends that PSC and DPS to consider subsidized rates or expanded bill discounts for low-income households that adopt heat pumps.

Buildings	Expand New York's Commitment to Market Development, Innovation, and Leading-by-Example in State Projects (p. 139)	The CJWG expressed broad support for market development and innovation investments as proposed here. The group called for attention to growing local supply chains and creating jobs in clean energy businesses that serve Disadvantaged Communities, as well as providing dedicated support to MWBE enterprises to innovate and actively participate in the transformation of the buildings sector.	In line with CJWG recommendations, the Draft Scoping Plan proposes to invest in Workforce Development to expand training to new clean energy workers and adjacent industries and prioritize DACS and low income residents for job training and placement by community to employment pipelines and OTJ training investments. The plan also recommends coordination with REDC's and local economic development agencies, SUNY and other State Agencies to support MWBEs, cooperatives, and B Corps. In regards to growing local supply chains, the proposals would provide assistance for in-State manufacturing as well for OTJ training in local businesses (e.g., HVAC, weatherization) that serve the buildings sector.
Electricity	Retirement of Fossil Fuel Fired Facilities (pp. 155-156)	The CJWG is supportive of strategies to facilitate retirement of fossil fuel fired generation facilities and recommends the Council take the additional step of placing a moratorium on the permitting of new fossil fuel plants until the final Scoping Plan is in place, or until there is a demonstrated system reliability need that can only be addressed with fossil fuel generation.	The Draft Scoping Plan recommends a comprehensive planning process to support the retirement of fossil fuel fired generation facilities. It stopped short of recommending a moratorium on permitting fossil fuel plants as the Power Generation Advisory Panel was not in consensus on this position.
Electricity	Accelerate Growth of LSR Energy generation (p. 159)	The CJWG is generally supportive of accelerating the deployment of large-scale renewable energy systems, however they also stress the need to balance this approach to large-scale renewables with significant investment and technical support for Disadvantaged Communities to develop behind-the-meter microgrids to reduce grid strain, increase resiliency and affordability, and diversify the State's energy portfolio. The strategies included in this draft Scoping Plan are aimed at doing just that and the need for support for underserved, LMI, and environmental justice communities has been emphasized in the strategies related to DG and CCA.	The Draft Scoping Plan also includes recommendations for support of distributed generation/distributed energy resources (p. 160), specifically as a means to help address social equity.
Electricity	Facilitate Distributed Generation / Distributed Energy Resources (p. 160)	The CJWG is supportive of this strategy. It suggests that there needs to be a process in place to assure that LMI community solar savings do not conflict, interfere, or in any way prevent access to the other LMI energy savings programs such as the Home Energy Assistance Program. It also flagged the point that when designing incentives, use of grants over tax credits is preferred as tax credits may not be beneficial for LMI consumers. These concepts have been included in the Components of the Strategy section below.	The Draft Scoping Plan specifically states (p. 161) that participation in incentives programs should be effective for the target audiences and not preclude participation in other programs.
Electricity	Support Clean Energy Siting and Community Acceptance (p. 162)	The CJWG supports finding compromise around local control while achieving State targets and emphasizes the need for community education and engagement to inform New Yorkers about the climate crisis and the benefits of shifting to a clean energy economy.	The Draft Scoping Plan identifies public education and outreach (p. 163) as essential components of supporting clean energy siting and community acceptance.

Electricity	Promote CCA (p. 165)	The CJWG is generally supportive of encouraging local climate action, and more specifically sees CCAs as tools for transformative change in the way consumers connect to and purchase their energy. The group adds that for CCAs to be successful, there needs to be removal of barriers to entry, particularly for lower income households, and safeguards for energy burdened households that may have been the target of previous predatory practices related to their energy bills and services.	The Draft Scoping Plan recommends the continued encouragement of CCA programs where communities choose 100% renewable energy as the default supply; the Draft Scoping Plan recommends prioritizing these efforts in Disadvantaged Communities
Electricity	Deploy Existing Storage Technologies (p. 166)	The CJWG was generally supportive of this strategy and suggested prioritization of energy storage to protect Disadvantaged Communities where the resilience need is greatest, which is contained in the components below.	The Draft Scoping Plan suggests (p. 167) that funding for energy storage deployment should be prioritized to projects that benefit frontline communities where the resilience needs are often the greatest.
Electricity	Invest in Transmission and Distribution Infrastructure Upgrades (p. 168)	The CJWG is supportive of this strategy, seeing it as key to building out renewables. It suggests the inclusion of additional actions, including to pro-actively identify key transmission and distribution upgrades, improvements, and new line construction needed to deliver renewable energy across the State and maximize the retirement of fossil fired resources. Furthermore, it suggests interconnection be approached through a justice-oriented lens where community-led and community-supported clean energy projects are facilitated and exempt from the sometimes costly interconnection fees that have proved some such projects uneconomic.	The Draft Scoping Plan calls for expansion of electricity transmission and distribution systems to support continued integration of additional renewable energy resources. It also calls for (p. 161) speeding up the pace of processing interconnection applications.
Electricity	Improve Reliability Planning and Markets (p. 170)	The CJWG generally supports the call for continued efforts to improve reliability and resiliency to extreme weather events and climate change, but suggests that the NYISO and its processes should be more transparent and information better disseminated with local energy advocates. It also suggests that there is a need to address extreme heat vulnerabilities beyond overcapacity to the grid, such as the increased water demand for cooling of power plant systems and the expansion of metal in power lines as a result of extreme heat resulting in sagging power lines leading to an increased risk of tree strike related fires. Furthermore, the group posits that storm hardening infrastructure investments must be first implemented in historically burdened Black and brown communities, since these communities have less access to cooling for summer storms, heating for winter storms, transportation, or savings.	The Draft Scoping Plan recommends (p. 171) that power system studies and planning should consider analyses to integrate climate change impacts as needed for reliability and resiliency and that (p. 171) infrastructure investments should continue to improve reliability and resiliency to extreme weather events.

Electricity	Explore Technology Solutions (p. 177)	<p>The CJWG supports the near-term focus on achievement of 70x30 via deployment of currently available solutions. However, it expresses strong concern about the promotion of some emerging technologies, including green hydrogen, RNG, biofuels, biomass, and waste-to-energy, which it claims can add more GHGs to the environment rather than less, and also leads to more localized pollution which is concentrated in environmental justice communities. The CJWG highlights the need for further research and consideration of lifecycle GHG accounting and potential air quality and health impacts of these technologies prior to supporting demonstration projects. The CJWG also recommends a lifecycle analysis of the environmental, health, safety, emissions, and environmental justice impacts of nuclear fuel be conducted and the State proactively plan for the scheduled shutdown of the four reactors upstate.</p>	<p>The Draft Scoping Plan specifically calls out (pp. 176-177) the need to ensure historically Disadvantaged Communities do not see an increase in co-pollutants or reduction in air quality as a result of the use of advanced fuels, and suggests that further analysis, technical development, and research is needed in order to determine the feasibility and climate and health impacts of advanced fuels to ensure they provide net benefit.</p>
Industry	Financial and Technical Assistance (p. 185)	<p>Directing State assistance toward reducing industrial emissions in Disadvantaged Communities would be supported by the CJWG. Industrial facilities often disproportionately affect Disadvantaged Communities, and investments can be prioritized to target industries with the greatest impact on these communities. Additionally, the CJWG noted that emissions reductions strategies for Industry do not mention regulation to drive down industrial emissions as close to zero as is technically possible. Additional regulation on industrial sources must be carefully considered within the Climate Act requirements to limit emissions leakage.</p>	<p>The Draft Scoping Plan proposes that the State provide technical and financial assistance to overcome barriers and other challenges to implementing emission reduction solutions necessary for decarbonization. The Draft focuses on incentive-based strategies for mitigating industrial emissions in recognition of the need to avoid emissions and economic leakage. The Draft recommends focusing investments and their associated benefits in Disadvantaged Communities.</p>
Industry	Low Carbon Procurement (p. 187)	<p>The CJWG supports this strategy, as well as other demand-side approaches, since State procurement preferences for low-carbon building materials can encourage less energy-intensive manufacturing in some sectors. The CJWG also recommended using a “best value” procurement framework to score bids that commit to climate mitigation efforts and related workforce, training, local hire, and apprenticeship programs targeted to residents in Disadvantaged Communities.</p>	<p>The Draft Scoping Plan proposes that the State create procurement incentives so that manufacturers will produce less emission-intensive goods to capitalize on the increased demand for such goods. The strategy would aim to identify carbon intense materials, develop standards, and provide policy support. The specific procurement framework and scoring methodology for any such procurement preferences need to be evaluated against a set of criteria that would effectively and equitably reduce emissions and grow a robust local workforce and manufacturing sector.</p>
Industry	Workforce Development (p. 188)	<p>The CJWG recommends these strategies ensure consideration of individuals in Disadvantaged Communities in business and workforce development efforts.</p>	<p>The Draft Scoping Plan proposes expanding the State's existing green workforce and focusing on training workers on existing decarbonization technologies and on newer solutions as they become available. This expansion would occur as part of the Climate Act's requirement to benefit workers in Disadvantaged Communities.</p>

Industry	Research, Development, and Demonstration (p. 189)	<p>The CJWG has raised concerns around technology solutions such as carbon capture and storage and hydrogen. The CJWG supports reducing fossil fuel combustion for industrial heat, replacing it with electric heat whenever feasible. The CJWG inquired specifically as to the future use of green hydrogen and made the point that combusting hydrogen has the potential to produce potentially harmful levels of nitrous oxide emissions. The CJWG recognized, however, that some industrial high-heat processes may not be electrifiable, and that in these cases green hydrogen is a potential alternative fuel. Identifying, quantifying, and mitigating these types of harmful effects associated with new technologies and approaches to eliminate hard-to-abate industrial emissions will be a necessary, critical concern of future research efforts.</p>	<p>The Draft Scoping Plan recognizes that long-term, deep decarbonization in the industrial sector will require the development of new technologies and that the State could speed the deployment of some of these new solutions with a robust RD&D agenda. However, it should be noted the specific technologies and solutions for deep decarbonization of the industrial sector have yet to be identified.</p>
Industry	Economic Incentives (p. 192)	<p>Directing State assistance toward developing green economy businesses in Disadvantaged Communities would be supported by the CJWG.</p>	<p>The Scoping Plan proposes that the State continue to develop an in-State supply chain of green economy businesses by offering economic incentives like loans, grants, tax credits, technical assistance programs, or even venture capital investments. The extent to which the State's support of green economy businesses are directed towards Disadvantaged Communities would at a minimum meet the Climate Act's requirement to target clean energy spending to benefit these areas.</p>
Agriculture and Forestry	Sustainable Forest Management (p. 199)	<p>The CJWG supports the strategies for Sustainable Forest Management, however suggested there is an over-reliance on voluntary incentive-based programs.</p>	<p>The Draft Scoping Plan proposes many strategies to support sustainable forest management (p.198). The recommendations include many that are incentive oriented as well as key legislative provisions needed to protect forest sequestration including a keeping forest as forest law to prevent conversions (p. 277), strengthened invasive species regulations (p. 201), and new tax law programs (p. 204). These are aimed at addressing the largest forest emissions that occur when forests are converted, giving family forest owners tools to manage their properties sustainably, and responding quickly to invasive threats.</p>

Agriculture and Forestry	Advance Alternative Manure Management (p. 210)	The CJWG favor imposing regulations on dairy and other livestock farmers to reduce emissions. The strategies outlined below rely more heavily on long established technical assistance and cost-share programs to achieve methane reductions from manure management. Feedback from the CJWG indicates a preference for manure management strategies upstream of the manure storage or that reduce animal waste generation at its source.	The Draft Scoping Plan proposed an expansion of current successful voluntary, incentive based efforts with a range of proactive outreach, technical and financial support. The strategies rely heavily on farm owner participation in voluntary, incentive-based conservation programs supported by key stakeholders across the state. In addition, the advancement of alternative manure management strategies include upstream strategies to reduce manure methane. Examples of this include, composting, dry manure handling and storage, and potential to advance grazing systems for livestock where the management and land base can support these systems.
Agriculture and Forestry	Advance Agriculture Nutrient Management (p. 215)	CJWG is supportive of efforts to reduce nitrous oxide emissions through more efficient use of nitrogen fertilizers and have suggested consideration of a fee on such fertilizers as a potential mechanism to reduce their use.	The Draft Scoping Plan emphasizes increasing support for planning, technical assistance, and implementation of practices that reduce nitrous oxide emissions through the AEM Framework and associated incentive programs. Further, the strategies emphasize engagement and expansion of programs to historically marginalized producers removing obstacles for participation. Consideration was given to scaling up existing programs and frameworks while seeking and developing innovative approaches to finance adoption.
Agriculture and Forestry	Adopt Soil Health Practice Systems (p. 217)	The CJWG supports soil health and climate resiliency and emphasizes removing barriers for underserved farmers which align with components of this strategy.	The Draft Scoping Plan emphasizes increasing support for planning, technical assistance, and implementation of practices that promote soil health through the AEM Framework and associated incentive programs. This includes building equity into programs, developing a soil health standard, and establishing annual goals for common practices. Further, the strategies emphasize engagement and expansion of programs to historically marginalized producers removing obstacles for participation.
Agriculture and Forestry	Increase Adoption of Agroforestry (p. 219)	The CJWG supports aiding BIPOC farmers in opportunities for securing farmland aligning with strategies for long-term farm leases and land transfers necessary for perennial systems.	The Draft Scoping Plan calls for AGM, AFT and other partners to assist farmers in securing long-term leases to BIPOC, women, LGBTQIA+, low income, veteran and beginning farmers. Long term leases would be required for long term perennial systems. (pp. 219-220)

Agriculture and Forestry	Bolster Local Agricultural Economies (p. 223)	This strategy speaks directly to the support of diverse farm operations including BIPOC, women, LGBTQIA+, low income, veteran, and beginning farmers, the CJWG should be supportive of the goals of this strategy.	The Draft Scoping Plan calls for efforts to expand procurement programs for NY products, increase engagement and participation in State programs, expand education and outreach for new farmers and support for new agricultural products.
Agriculture and Forestry	Develop a Sustainable Biomass Feedstock Action Plan and Expand the Use of Bioenergy Products (p. 227)	The CJWG expressed concerns about the combustion of biomass and biofuels due to their release of emissions.	The Draft Scoping Plan only includes strategies related to the use of biomass and biofuels when they provide value by displacing traditional fossil fuels, particularly in hard-to-electrify applications. Biomass and biofuel emission concerns raised by the CJWG are addressed through thoughtful planning, sustainability guidelines and standards. The scoping plan proposes utilization of biofuels and bioenergy for limited and strategic use combined with sustainability guidelines and standards.
Waste	Organic Waste Reduction and Recycling (p. 241)	The CJWG agrees that ending the disposal of food scraps and yard waste at landfills and incinerators is probably the single most important action the State can take to cut emissions from this sector. The CJWG recommends stronger programs to require major food generators, farms, supermarkets, restaurants and institutions like universities, hospitals to all develop sophisticated programs that transfer excess edible foods to local food banks and other programs designed to feed the hungry.	The Draft Scoping Plan calls for the significant reduction in the disposal of organics and the enactment of legislation to amend and expand the existing Food Donation and Food Scraps Recycling Law (2019) to phase in organics source-separation requirements, eventually ban combustion and landfilling of organics. The Food Donation and Food Scraps Recycling Law currently requires the covered entities to donate edible food to the maximum extent practical and expansion of the law to other generators will lead to additional donation. The Draft Scoping Plan also recommends additional funding for emergency food relief organizations and others. A determination of whether large food generators should be required to transfer excess edible food to areas of need remains to be made.
Waste	Waste Reduction, Reuse, and Recycling (p. 242)	The CJWG supports policies that encourage systems thinking to reduce waste as a priority, while also encouraging greater recycling. CJWG recommends convenient recycling collection programs throughout the State and that these programs receive adequate funding.	The Draft Scoping Plan strongly supports waste reduction and recycling. This includes supporting a fee on every ton of waste disposed to support waste reduction, reuse, and recycling, legislation requiring "By Request Only" policies and reuse options, phase-out of single use packaging, textile recycling program enhancements, etc. A determination of whether convenient recycling programs should be established remains to be made.

Waste	Extended Producer Responsibility/Product Stewardship (p. 244)	The CJWG is strongly supportive of policies focused on waste reduction and have expressed support for EPR, indicating that passage of an EPR bill should be a priority for addressing emissions from the waste sector.	The Draft Scoping Plan (p. 243) strongly supports the enactment of broad expanded producer responsibility (EPR) legislation. This includes potentially framework legislation or targeted programs for large impact programs such as packaging.
Waste	Water Resource Recovery Facility Conversion (p. 245)	The CJWG favors on-site use of biogas captured from waste management and that no significant new transmission infrastructure should be allowed to support additional biogas.	The Draft Scoping Plan recognizes that the best use for biogas generated from waste is onsite or local uses, and for hard to electrify industries. The Draft recommends that the State support the beneficial use of biosolids and renewable biogas. The potential biogas generation that could be generated from waste is not sufficient to require or justify new transmission infrastructure.
Waste	Fugitive Emissions Monitoring, Detection, and Reduction (p. 246)	The CJWG strongly supports controlling fugitive emissions from landfills, sewage plants and other methane sources as a critical step in reducing emissions from the waste sector.	The Draft Scoping Plan recognizes the critical role that controlling and reducing the fugitive emissions from solid waste management facilities plays in this sector. Enhanced monitoring, regulatory oversight, and reduction techniques are supported in the Plan.
Waste	Recycling Markets (p. 249)	The CJWG are supportive of recycling programs that cut the need for virgin materials and reduce emissions from the manufacturing of consumer goods.	The Draft Scoping Plan recognizes that recycling markets are a necessary component of any successful recycling program and the emissions reductions achieved. The Plan supports market development, recyclables procurement, tax credits for recycled products, and enhanced used for organics products.
Waste	Biogas Use (p. 250)	The CJWG expressed that biogas could play a role in environmentally sound waste disposal, but caution should be taken to avoid biogas use intentionally or inadvertently leading to the extended use of fossil fuels.	The Draft Scoping Plan outlines the role that biogas can play in diverting organic waste from landfilling and that landfills will continue to generate biogas for many decades. The Draft Plan also recommends that this biogas use be limited to strategic uses such as on-site needs, local uses, and other uses that would not encourage the extended use of fossil fuels.
Gas System Transition	Transition Away from Gas (p. 267)	The CJWG supports the transition away from gas infrastructure and stresses the need for cost-effectiveness and equity to ensure the transition is just. The CJWG recommends that progress be prioritized in Disadvantaged Communities, where co-pollutants pose a high cumulative burden, and that any progress support the denial of fossil gas infrastructure permits.	The Draft Scoping Plan calls for a detailed analysis to determine the most equitable and cost-effective strategy for transitioning from fossil gas while maintaining affordable, safe, and reliable service. It further calls for (p. 268) the state to develop a comprehensive equity strategy to prioritize the needs of LMI households and Disadvantaged Communities in the transition to ensure they are not left behind.

Gas System Transition

Reduce Fugitive Emissions from Gas Infrastructure (p. 271)

To cap abandoned wells, the CJWG suggests that public funds be used as a last resort and that the State consider ways the oil and gas industry could contribute to reducing emissions from these sources.

The Draft Scoping Plan does not indicate where funding for capping abandoned wells would come from, rather it states that appropriate funding sources should be identified to locate and cap abandoned wells.