**Sustainable Bethel**

**c/o 3454 State Rte 55**

**White Lake, NY 12786**

Thank you for this opportunity to provide comments on the NYS Draft Scoping Plan. This report is stunning in its ambition and scope. It is a detailed roadmap for navigating the global climate crisis and demonstrates New York’s commitment to leadership on this issue. It lays out in stark detail exactly what we are facing and how aggressively transitioning to a lower emissions economy will benefit all New Yorkers. Of particular importance is the focus on social justice, pledging as it does to ensure allocation of at least 35%, and preferably 40%, of clean energy and efficiency funding to assist marginalized people who are the most affected by this crisis. We strongly support the Draft Scoping Plan and applaud the time, effort, ambition and vision of the various working groups which contributed to it so as to achieve the goals of New York State’s ambitious Climate Leadership and Community Protection Act (“CLCPA”).

Sustainable Bethel is the advisory sustainability committee of the Town of Bethel in Sullivan County. The Committee, comprised of Town Board members and community volunteers, has been working since 2013 to promote and support environmental sustainability measures. Our Town was recognized as a Bronze-certified Climate Smart Community in 2018 and is a designated Mid-Hudson NYSERDA Clean Energy Community. We have worked hard to reduce our carbon footprint (our capped landfill-sited community solar array should go operational this fall) but have also unsuccessfully fought new fossil fuel infrastructure (the newly constructed compressor station on the Bethel-Town of Highland border).

Bethel has approximately 4000 residents and its small municipal staff totaling 21 means that it has no “office of sustainability” or dedicated sustainability personnel. Often, the State’s sustainability programs overlook issues that particularly impact small rural municipalities. As such, we urge and recommend, generally, that the Draft Scoping Plan recognize the differences in needs-- and needed solutions --among rural, suburban and urban communities and, wherever possible, specify approaches that may be targeted to the State’s hundreds of smaller, rural municipalities. For the Town of Bethel, the “will” is there but the implementation of sustainability initiatives continues to be significantly dependent on the availability of State funding and technical support.

Below are our specific comments on the strategies in the **Waste** chapter:

**1) Set a target of 2030 to end combustion and landfilling of municipal organic waste, with timetables for phase-down.** As the Integration Analysis for the Climate Action Council shows, 100% diversion of organic waste from landfills by 2030 will be necessary to meet the State's emissions reduction targets. To help reach this target:

* **Strengthen the Food Donation & Food Scraps Recycling Law.** Under current law, businesses and institutions that generate two tons of waste or more per week are required to donate the edible portion of their waste and recycle the rest if within 25 miles of an organics recycling facility. The two-ton threshold should be reduced to one ton by 2024 and a half ton by 2026. (Massachusetts has had a one-ton threshold in place for years, and is reducing it to a half ton in November 2022.) Broaden the law to apply to hospitals, nursing homes, and K-12 schools.
* **Require a** **per/ton surcharge on all waste** to fund reduction, reuse and recycling programs, as recommended by the Scoping Plan, while also expanding policies and programs to encourage backyard residential composting and on-site composting at institutions and large generators.
* **Expand local financial assistance** for organics recycling infrastructure and successful models of organics collection programs.
* **Require local solid waste management planning to incorporate food scraps recovery** for food pantries and programs to feed the food insecure. The Municipal Waste Reduction and Recycling Program must be funded at a level adequate to support composting programs and recovery of food scraps.
* **Develop a plan to support markets for compost and encouraged its use by farms** as an alternative to synthetic fertilizers.
* **Support the development of appropriately-scaled organic recycling facilities on farms**, which could provide a revenue stream for farmers while encouraging the use of compost.

**2) Develop a target date and timetable for phasing down waste incineration, and end renewal of 20-year permits for existing facilities.**

**3) Prioritize waste reduction & reuse of plastics and textiles.**

* Enact an **Extended Producer Responsibility (EPR) program for packaging** that:
* Requires companies to cut production of plastic packaging by 50% by 2030;
* prohibits toxics in packaging and requires use of safer alternatives;
* provides strong oversight and accountability by the NYS Department of Environmental Conservation;
* requires that companies pay fees based on the degree of difficulty of packaging recycling and the extent of recycled content. Fees can help compensate communities for recycling costs and support reuse and recycling programs.
* Develop EPR programs for other products, including solar panels and wind turbines, all batteries, appliances, and household items like mattresses and carpets.
* Immediately enact **"By Request Only"** legislation for plastic straws, stirrers, utensils, and individually packaged condiments, and **require reusable/refillable** options in retail outlets.
* Enact legislation to **reduce and phase out single-use packaging.**
* **Prohibit incineration of plastics waste and all types of plastic burning (including "chemical recycling").** The combustion of plastics not only contributes to GHG emissions but also generates many other types of harmful emissions damaging to public health--particularly in disadvantaged communities, where incinerators tend to be sited.
* Implement **comprehensive textile waste reduction and recycling**.

**4) Update, strengthen and expand recycling laws, regulations and incentives.**

* **Extend the "Bottle Bill" to wine, spirits and non-carbonated beverages, and increase the deposit from five cents to a dime**.  Create other container deposit programs to encourage recycling/reuse.
* Require a **minimum level of recycled content** in packaging and in certain products.
* Develop and enact **state procurement standards** for recyclable products.
* Enact a **production tax credit** to encourage companies turning recyclable materials into intermediate products to locate facilities in New York.
* Provide support and financial assistance to municipalities/counties to improve code enforcement for recycling programs, and for the development of local reuse centers, material exchanges, and repair shops.

Thank you for the opportunity to comment on this critical policy plan.

**Karen London, Co-Chair**

Sustainable Bethel