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Testimony of

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before the

New York City Council
Committee on Environmental Protection, Resiliency and Waterfronts

December 12, 2023

Good afternoon, Chair Gennaro and members of the Committee. My name is Beatrice Thuo, and I am the executive deputy commissioner of Citywide Operations at the Department of Citywide Administrative Services (DCAS). I am joined today by the City's Chief Decarbonization Officer and DCAS' Deputy Commissioner of Energy Management, Sana Barakat and Chief Fleet Officer and DCAS' Deputy Commissioner for Fleet Management, Keith Kerman; Deputy Director of Resilient and Efficient Buildings at the Mayor's Office of Climate and Environmental Justice (MOCEJ), Joe Chavez; and Director of the Office of Energy and Resource Recovery Programs and Agency Chief Decarbonization Officer at the Department of Environmental Protection (DEP), Jane Gajwani.

I want to extend a special welcome to Sana, who joined DCAS this past July, after many years in the sustainable design and engineering consultancy sector, managing large-scale and multidisciplinary projects for public sector clients, including several City agencies. We are excited to have her take the reins as the City's Chief Decarbonization Officer and accelerate our work reducing greenhouse gas (GHG) emissions from city government operations. I am excited to give you an update, so let's dive right in.

Local Law 97, part of New York City's landmark Green New Deal legislation of 2019, requires New York City to reduce greenhouse gas emissions from city government operations 40 percent by 2025 (40x25) and 50 percent by 2030 (50x30), compared to a Fiscal Year 2006 baseline. This includes emissions reductions from the City's portfolio of over 4,000 municipal properties – we're talking about schools, universities, fire houses, police stations, courts, hospitals, museums, zoos, libraries, and much more. City government is mandated to reduce emissions further, and faster, than the city as a whole, which is expected to achieve a 40 percent reduction by 2030. These mandates set the

City on a path to carbon neutrality by the year 2050. The City has also committed to meeting targets including reducing greenhouse gas emissions in the City government fleet 50 percent by 2025 (50x25) and 80 percent by 2035 (80x35), compared to a Fiscal Year 2006 baseline, in addition to reducing city government energy use by 20 percent.

In December 2021, pursuant to Executive Order 89 (EO 89), DCAS released the Local Law 97 Implementation Action Plan (IAP), which sets the path for city government's Local Law 97 compliance, identifies the resources necessary to meet our Local Law 97 mandates, and establishes agency emissions reduction targets. These targets can be found on our website, and we update agency emissions reduction performance annually, as required by Executive Order 89.

According to our latest data, city government has reduced emissions from our operations by over 25 percent below the Fiscal Year 2006 baseline, compared to 17 percent for the city as a whole, including the private sector. City government is leading by example and outpacing the decarbonization of the city across all sectors and industries.

Let me be clear, while city government is leading by example and outpacing the private sector, we are still facing considerable challenges and expect to fall short of our Local Law 97 reduction target for 2025. As this Administration has been saying since early 2022, we were optimistic, but the 2025 target set in 2019 was always going to be very difficult to meet. I'll repeat what the City's Chief Climate Officer, Rohit Aggarwala, said before this Committee in April 2022 – *"the reality is that time is not on our side to meet the 2025 mandate."* However, this Administration remains steadfast in our commitment to achieving our emissions reduction goals, and we expect that we will not only meet, but surpass, our 50x30 target. It's an all-hands-on-deck effort to get as close to 40x25 as possible, but as we shared with you last year, many of the challenges to achieve 40 percent on this ambitious timeline are outside the City's control. I will outline some of those challenges for you later in my testimony.

But I want to focus now on all that we are doing to meet and exceed our longer-term targets. To date, the City has invested well over a billion dollars toward decarbonization, and since Local Law 97 passed has laid the groundwork to accelerate this work by designing focused programs to make building improvements, like our Direct Install Lighting Program and collaborating with the New York Power Authority to scale solar installations. We are also close to soliciting vendors to complete solar projects and deep energy retrofits of buildings, under our existing design build authority. We are at an inflection point, positioned to make great strides over the next several years.

Decarbonizing city government operations is also central to this Administration's larger focus on improving the quality of life of New Yorkers and addressing long-standing inequities. We all know fighting climate change is not just about reducing greenhouse gas emissions – it's also about improving public health, addressing historic disinvestment, and creating jobs. Using less fossil fuel reduces emissions of pollutants like particulate matter

that are a public health threat, particularly for older adults, children, and people with heart and lung conditions. We are investing in Disadvantaged Communities (DACs)¹ – 56 percent of solar capacity installed on City buildings is located in Disadvantaged Communities, 57 percent of city government operations' greenhouse gas emission reductions are from projects in Disadvantaged Communities, and 53 percent of particulate matter reductions have been in Disadvantaged Communities. And finally, DCAS' work on energy-saving projects has generated over 6,100 good-paying jobs since Fiscal Year 2006.

DCAS leads the City's decarbonization efforts and partners with more than 20 City agencies to implement energy efficiency, electrification, and renewable energy generation projects throughout the city. The City takes a multi-tiered approach to decarbonizing city government operations:

- **We are driving down energy consumption at City-owned buildings** through retrofitting building systems, improving operations and maintenance, and optimizing building controls. Over the past decade, we have partnered with City agencies to invest over \$1B in building energy efficiency projects, which has resulted in an annual energy reduction of approximately eight percent compared to before making these investments, and despite significant growth in total square footage of our building portfolio. We also expanded our Demand Response Program—in summer 2023 over 600 facilities from 34 agencies participated, reducing energy use during hot summer months to protect the city from brownouts and blackouts.
- **We are electrifying buildings systems**, including heating, hot water systems, and appliances, which the City committed to in PlaNYC, helping set the City on a course to achieve the deep decarbonization mandates for 2050 and improve air quality in communities. This includes the Adams Administration's landmark Leading the Charge initiative to electrify 100 existing schools over the next decade and start transitioning all NYC schools to operate on electric power. Four school electrification projects have begun construction this year with another 15 in planning and design. This plan and, Council Member Gennaro, your recently passed Local Law 32 of 2023, will also accelerate the phase out of No. 4 heating oil by five years.
- **We are decarbonizing processes and systems at wastewater resource recovery facilities** to achieve net-zero energy consumption in the wastewater treatment sector by 2050. We are making our processes leaner while maintaining robust operation, and are leveraging DEP's unique infrastructure to not only

¹ NYS's Climate Leadership and Community Protection Act (CLCPA) established the Climate Justice Working Group (CJWG) and mandated CJWG to develop a set of criteria to identify communities most impacted and vulnerable to climate change in NYS. The CJWG developed dozens of criteria and applied them to census tracts to develop the first statewide map of Disadvantaged Communities (DACs) in March 2023.

decarbonize the agency, but to also help the City decarbonize as a whole. These efforts are being led by our partners at DEP.

- **We are decarbonizing the City's fleet** by transitioning to electric vehicles and investing in renewable diesel. These efforts are led by our Chief Fleet Officer Keith Kerman, and we will go into more detail about them in a minute.
- **We are also investing in clean energy generation:**
 - First and foremost, we are generating renewable energy on our own properties by building solar PV arrays. To date DCAS, in partnership with several agencies, has doubled our solar capacity on City-owned buildings since COVID – we have installed 22.7 MW of solar PV on City facilities, enough to power nearly 6,400 NYC households per year, and we have executed contracts that will bring an additional 50 megawatts of solar by December 31, 2025. I want to emphasize what a feat this is in an urban environment as dense as New York City.
 - Additionally, New York City has committed to purchasing Tier 4 renewable energy credits (RECs) generated from the Champlain Hudson Power Express (CHPE) and Clean Path New York (CPNY) projects, which will help fund these projects that will bring 2,500 MW of clean, renewable energy from Canada and upstate New York into NYC. This will allow city government operations to be powered by 100 percent clean electricity by 2026 and amplify the greenhouse gas reductions that result from the City's investments in building system electrification. These projects will also reduce the city's reliance on fossil fuel power plants, improve grid reliability, and make more clean electricity available to all New Yorkers and help the private sector meet their own Local Law 97 obligations.
 - The New York City Economic Development Corporation (NYCEDC), on behalf of the City, is also playing a critical role in creating a nation-leading offshore wind hub at South Brooklyn Marine Terminal. In parallel, EDC is investing in education pipelines for jobs, and creating job programs that identify and train talent from historically underrepresented areas to ensure all New Yorkers can benefit from green opportunities.

On the buildings and solar energy side, DCAS has partnered with City agencies to implement over 13,700 energy efficiency and decarbonization measures in over 2,000 buildings since Fiscal Year 2006. Our efforts have reduced annual energy costs by \$137 million and greenhouse gas emissions by over 420,000 metric tons of carbon dioxide equivalent (CO₂e)—that's equal to removing nearly 92,000 cars from the road. In order to implement these decarbonization projects, the City has created processes, policies, and grown the capacity of City government to scale work:

- **We are building human capital** so agencies have the capacity to implement energy efficiency, electrification, and renewable energy generation projects. This includes providing more than 20 agency partners with training, tools, technical

expertise, funding, and staff – including Agency Chief Decarbonization Officers – which will elevate decarbonization priorities within agency leadership.

- OMB is leading a new initiative, **Climate Budgeting**, which incorporates an analysis of climate impact into budget plans and develops new actions to move the city toward its climate goals.
- The Administration is also making significant efforts to **cut red tape**, make it easier to build and procure goods and services, and amend zoning citywide so that we can do what we need to do to meet our climate goals more efficiently and faster, while creating jobs. I want to thank the Council for approving the **City of Yes for Carbon Neutrality** zoning initiative last week, which will allow us to decarbonize our buildings more and faster. We greatly appreciate the Council's partnership on that effort, and are thrilled that it is over the finish line.
- The City is also a vocal **advocate for the State to make smart energy policy decisions and accelerate renewable energy projects that will clean our grid**. The City and the State must be strong partners to achieve both the City's Local Law 97 mandates and the State's targets under the Climate Leadership and Community Protection Act (CLCPA). DCAS supports our partners at MOCEJ, which leads this advocacy.
- Finally, the Administration released **PlaNYC** in April, which lays out clear, achievable actions that the City will take to decarbonize and make our City more livable and resilient for all New Yorkers, especially in communities that have been neglected in the past. Following that, the Administration released **PowerUp**, the City's Long-Term Energy Plan, which connects the work that all of our City agencies are doing to the larger energy strategies that will ensure all New Yorkers have clean, reliable, and affordable energy.

I'd love to give you a few examples of projects:

- Chair Gennaro, in your district DOE and DCAS partnered to install a 582 kW solar PV system on the roof of the Thomas A. Edison Career & Technical Education High School—generating 60 percent of the school's electricity needs and supporting hands-on student training.
- In Council Member Restler's district, DCAS is partnering with DEP to install a gravity belt thickener and thermal energy installation at the Newtown Creek Wastewater Resource Recovery Facility. This will reduce energy use equivalent to nearly 19,000 NYC households and lead to \$4.5 million in annual energy cost savings.
- DCAS is working with the New York Power Authority to install 10MW of solar PV at the Wards Island Wastewater Recovery Facility, using the novel approach of installing solar canopies over process tanks, which increases the installed capacity ten-fold. This will be the largest clean energy installation on a wastewater treatment facility anywhere in the world – yes, you heard that right, in the **world!**

- In Harlem, DCAS has partnered with DEP to install 12 MW of electricity generation that will run year-round on renewable biogas generated onsite, and be able to take significant load off the electrical grid during peak demand times.
- At the Metropolitan Museum of Art, DCAS completed major lighting fixture upgrades of 20,000 fixtures in three special exhibition spaces in April last year. This project is estimated to save the City over \$100,000 in annual electricity utility bills.
- And DCAS is upgrading many different energy systems at CUNY campuses. These upgrades include building management system controls, HVAC replacement, electrical submetering, and other retrofit measures.

And there are so many more projects that we would love to share, and I'd be happy to meet with you all and discuss projects in your districts, but I'll stop there for now.

Moving on to non-stationary assets, the City fleet plays an integral role in the reduction of the greenhouse gas emissions from city operations. Vehicles account for nearly nine percent of the 2006 greenhouse gas emissions baseline and under the leadership of Chief Fleet Officer and Deputy Commissioner, Keith Kerman, DCAS Fleet had developed the greenest municipal fleet in the country.

In 2015, NYC published the NYC Clean Fleet Plan. This plan committed the City to reducing greenhouse gas emissions 50 percent by 2025 (50x25) and 80 percent by 2035 (80x35). The plan, updated in 2021, outlined three broad strategies: electrify the fleet as fast as operationally feasible; replace diesel fuel with biofuels; and improve fleet efficiency. DCAS has aggressively pursued these approaches and is on pace to achieve Fleet 50x25.

In 2023, DCAS worked closely with the City Council on codifying the electric fleet initiative into law. On October 23, 2023 Mayor Adams signed Local Law 140 which calls for the City fleet to transition to electric by 2038. This legislation further established NYC as a leader in fleet sustainability and is a model for other cities and fleets to adopt. DCAS currently operates one of the largest electric fleets and charging networks in the United States and will soon surpass the 5,000 electric fleet mark. We also operate 1,600 electric charging ports and will add at least 200 fast chargers and carports each year through 2030.

Further, on November 28 of this year, Mayor Adams and DCAS Commissioner Pinnock announced that the City was transitioning to renewable diesel for the entire trucking and off-road diesel fleet. Renewable diesel is made of the same waste and organic feedstocks as biodiesel. However, renewable diesel is manufactured to the same technical specification as regular diesel while fully replacing fossil diesel in our fleet, unlike biodiesel which can only be used in blends of 20 percent or less. The new mix does not have a petroleum base and burns cleaner with 15 percent to 35 percent fewer tailpipe emissions.

As we transition to an electric fleet, the switch to renewable diesel is a critical measure to immediately cut down on greenhouse gas emissions from the fleet as the technology and market for electric heavy-duty vehicles develops. Today, all trucks from DSNY, Parks, DOT, DOC, and DEP are fully operating on renewable diesel and the entire fleet will complete the transition by June 30, 2024.

Finally, DCAS continues to operate our fleet more efficiently in order to reduce fuel use. Following the Mayor's April 2022 fleet reduction initiative, DCAS has reduced the number of City vehicles by 4 percent, or over 900 units.

Overall, over 20,000 fleet units now use some type of cleaner fuel alternative including electric, hybrid, solar, and biofuel. Since Fiscal Year 2018, DCAS has reduced total fleet fuel use by 4.6 million gallons annually or 16 percent. The three approaches of electrification, biofuels, and efficiencies are working, and have led to a cleaner, more efficient fleet, and kept DCAS on pace to achieve 50x25.

While the City's work to date is impressive, we know that we expect to fall short of our Local Law 97 2025 mandate, and I want to explain some of the challenges that the City continues to face as we approach 2025 and beyond.

- First, COVID set the City's progress back by about two years—staff were redirected to other critical work, projects were cancelled, contracts were delayed, and we are still facing supply chain issues and higher costs of materials and equipment.
- Additionally, in 2022 the electricity grid serving NYC was nearly 12 percent dirtier than in 2019 because the Indian Point nuclear facility closed. This increases the greenhouse gas emissions that result from using electricity, and reduce the benefits of electrification projects.
- Procurement and contracting challenges have slowed project delivery. DCAS is focused on making our procurement and contracting faster to overcome contracting delays and has launched the Local Law 97 Contracting Resources Working Group to stand up faster, more flexible ways to deliver projects.
- And finally, as we all know, the City is facing extraordinary budget pressures that could force us to do more with less in the coming years..

Despite these challenges, the Adams Administration is fully committed to achieving our climate goals, and we are working at full steam to make our city government buildings and operations more efficient, reduce greenhouse gas emissions, and modernize buildings that serve New Yorkers. We are showing the private sector that this work is not just achievable, but pivotal for making sure our city is livable and thriving in the future.

We appreciate the support and advocacy you have shown toward our work, and we look forward to continued partnership with Council as we continue our aggressive march toward carbon neutrality. I am happy to answer any questions you have.



New York City Environmental Justice Alliance

462 36th Street, 3F, Brooklyn, NY 11232 | www.NYC-EJA.org

On the ground – and at the table.

**Testimony on the City's Obligation to Reduce Carbon Emissions from Government Operations - Committee on Environmental Protection, Waterfront, and Resiliency
New York City Council
December 12, 2023**

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens by the coordination of campaigns designed to inform City and State policies. Through our efforts, member organizations coalesce around specific common issues that threaten the ability of low-income communities of color to thrive. NYC-EJA is led by the community-based organizations that it serves.

New York City is not doing enough to reduce carbon emissions from government operations. The City government is required to reduce 40% of its emissions by 2025 and 50% by 2030, contributing to the citywide goal of 80% emissions reduction by 2050 and complying with the State's net zero by 2050 mandate. Beyond government operations, the administration is also contributing little to the 1,000 MW of solar by 2030 and 500 MW of energy storage by 2025 citywide targets.

The City has set out to install 100 MW of solar on city properties by 2025. This goal was established nearly 10 years ago; however, the latest data from the Department of Citywide Administrative Services (DCAS) show only 16.2 MW of operating solar generation capacity and a total of 46 MW of solar in development. With less than 2 years left to achieve this goal, the city government is woefully behind and not on track to meet this commitment.

NYC public school buildings are some of the most polluting City-owned buildings, and these schools make up nearly one-quarter of all City-owned buildings. There is huge potential for the City to reduce government emissions by improving energy efficiency and electrifying public schools. While the "Leading the Charge" initiative was a start, there is so much more to be done. As a first step, Mayor Adams must allocate the remaining \$2.3 billion of the said \$4 billion in funds, prioritizing the electrification of 100 schools among other proposed measures under Leading the Charge, and commit additional funds to retrofit schools in dismal conditions.

Beyond dragging our feet in reducing emissions from City-owned properties, the Department of Environmental Protection (DEP) is also displaying lamentable inertia in reducing their emissions.

Wastewater treatment is the second highest source of emissions in government operations behind buildings. A third of wastewater treatment emissions come from fugitive methane because DEP is producing an excessive amount of biogas from the city's Wastewater Resource Recovery Facilities (WWRFs). The Newtown Creek anaerobic digester had only functioned for a mere couple of weeks before being taken offline, but DEP still plans to go ahead with building new anaerobic digesters across the city and diverting organic waste from composting, a process that actually sequesters carbon and contributes to our city's soil health. Although NYC-EJA believes that anaerobic digestion has a part in New York's clean energy future, DEP's current path is irresponsible and puts communities in harm's way. This is exacerbated by the Mayor's November financial plan to completely eliminate community composting with no commitments to composting the majority of organic waste collected by the Department of Sanitation. These budget cuts put into question the administration's strategy to convert organic waste into natural gas for heating fuel. No effort has been made to reduce the amount of fugitive methane that has been escaping from the city's Wastewater Resource Recovery Facilities, and residents from Greenpoint and Williamsburg are constantly being exposed to flared excess biogas in their own neighborhood, contributing to air quality issues while National Grid uses the generated biogas as an excuse to increase gas bills.

We are further concerned about the City's goals to become the nation's first East Coast city to transition its heavy-duty vehicle fleet to renewable fuel. The City must fend off fossil fuel industry-led efforts to incorporate "renewable diesel" and other non-zero emissions fuels in its future policies to ensure we meet our climate targets. Non-zero emissions fuels, such as renewable diesel, are designed to prolong the life of fossil fuel infrastructure and/or require significant modifications to existing infrastructure, including storage and distribution systems. Instead, the City should pursue an electrification-first transportation strategy and only allow carve-outs for genuinely hard-to-electrify transportation sectors, such as shipping and aviation. New York State adopted the Advanced Clean Cars II regulation earlier this year, requiring all new passenger cars, trucks, and SUVs sold in New York to be zero-emissions. California recently adopted the Advanced Clean Fleets (ACF) package of regulations that will deploy medium- and heavy-duty zero-emission vehicles (ZEV) everywhere feasible. New York State can be the first state to emulate this plan. The City should advocate for the State to adopt policies such as ACF regulations to help transition its fleet to zero emissions.

Reducing emissions from City government operations is necessary for the climate and health of all New Yorkers. City government can lead the way in spearheading environmental protection, but what we are seeing today is an administration that only provides surface-level programmatic design without real labor, funding, and implementation efforts when the time to act on meeting these goals and obligations is quickly closing. The City must limit biogas generation, reject alternative fuels, block carbon capture and storage, refund community composting, compost organic waste, electrify buildings and fleet, and build solar and energy storage. These are the proven and scalable solutions that must be funded and implemented today.



Statement of New York Lawyers for the Public Interest
to the Committee on Environmental Protection, Resiliency, and
Waterfronts of the New York City Council
December 12, 2023
Regarding The City's Obligation to Reduce
Carbon Emissions from Government Operations

Thank you, Chair Gennaro and members of the committee for the opportunity to submit written testimony on this critical topic.

New York City's operations have a huge impact on climate emission and local pollution emissions within communities. Our government operations employ 370,000 people, with a budget of \$107 billion this year. Last year, the City reported that direct emissions from government operations including buildings, city-owned vehicles, and wastewater treatment plants have returned about 2.9 million tons of CO₂ – roughly the same annual pollution as 2018 and 2019, when the City Council passed a number of landmark climate laws intended to address the root causes of a spiraling climate crisis while creating thousands of good, green jobs and addressing the unequal health impacts of pollution on low-income communities and communities of color.

Local laws intended to sharply reduce major sources of emissions from both City government operations and from the City's economy as a whole include:

Local Law 97 of 2019, which requires a 40% decrease in emissions from City government operations by 2025, and a 50% reduction by 2030;

The Renewable Rikers Act of 2021, which requires the transfer of land from the Department of Corrections to DCAS and requires the consideration of using this land for sustainability and resiliency;

Local Law 120 of 2021, requiring the City to replace diesel and gas-burning school buses with zero-emissions electric school buses by 2035;

Local Law 140 of 2022, requiring the City to purchase only zero-emissions light-duty and medium-duty vehicles beginning in 2025, and zero-emission heavy-duty vehicles beginning in 2028; and

Local Law 199 of 2019, which will require designated commercial waste haulers to offer organics and recycling services, including commercial buildings leased for City operations;

These critical climate laws will not sufficiently reduce emissions if they are not fully implemented and vigorously enforced, and it is deeply disappointing that the City is not on track to meet the target of a 40% reduction in emissions by 2025. We are also deeply concerned that budget cuts and understaffing will negatively impact various City agencies charged with regulating pollution, improving public health, and effecting a rapid transition to sustainable City government operations, especially in the communities most burdened by fossil fuel infrastructure and combustion.

We stress to members of the Council that fossil fuel and real estate industries' must not be allowed to delay or avoid necessary investments in efficiency and electrification by adopting false solutions such as carbon capture and storage, biofuels, and so-called "green" hydrogen.¹

These expensive, inefficient, and distracting technologies threaten to undermine our climate mandates, and prolong the City's reliance on outdated, expensive, and fundamentally harmful fossil fuel infrastructure concentrated in low-income communities and communities of color.

We also emphasize that New York City's potential to reduce greenhouse gas emissions goes far beyond the relatively narrow scope of emissions tracked by the annual greenhouse gas inventory. For example:

Overall transportation emissions can be sharply reduced by ensuring that hundreds of thousands of City employees have reliable and sustainable transit options to travel to and from work;

Sustainable waste management practices in City schools and buildings can and should be part of a comprehensive zero-waste campaign promoting waste reduction, composting, and recycling across the residential and commercial sectors; and

The City's goal of developing 500MW of solar generation citywide and 100MW on City-owned properties by 2025 is only a fraction of the 2.8 Gigawatts of solar generation that the PEAK coalition has estimated is necessary to replace the City's polluting and expensive fossil fuel peaker plants.²

¹ For more information, see "False Solutions," NY Renewables, 2021: <https://static1.squarespace.com/static/58ae35fddb29d6acd5d7f35c/t/60351d79b4a58450d1f9dd8b/16140936944/07/False+Solutions+Report+-+FINAL.pdf>

² See "The Fossil Fuel End Game," PEAK Coalition, 2021: <https://www.cleanegroup.org/wp-content/uploads/Fossil-Fuel-End-Game.pdf>

We therefore urge DCAS and other city agencies to think expansively about the potential for properties including rooftops, parking lots, Rikers Island, and landfills as sites for renewable energy generation, storage, and sustainable waste management infrastructure.

Finally, the City can also leverage the huge purchasing power it has for vehicles, equipment, food, and other goods and products to reduce the emissions embedded in these materials, and to create markets for low- and zero-emissions infrastructure.

In short, New York City has the potential to lead the way to a sustainable economy provided that we make immediate investments in infrastructure, staff, and public education.

We look forward to continued work with City Council to ensure that DCAS, Buildings, Education, Sanitation, and Environmental Protection are fully staffed and sufficiently funded in this year's budget and going forward to make the large-scale investments necessary to reduce emissions operations across the City's operations, and to lay the groundwork for an economy-wide transition away from fossil fuels.

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For more than 45 years, NYLPI has fought to protect civil rights and achieve lived equality for communities in need. NYLPI combines the power of law, organizing, and the private bar to make lasting change where it's needed most. Our Environmental Justice program fights environmental racism, works to eliminate the unfair burden of environmental hazards borne by low-income communities and communities of color, and seeks to create a more equitable and sustainable city. For more information visit www.nylpi.org



**Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
City Council Committee on Environmental Protection, Resiliency and Waterfronts
Oversight Hearing on the City's Obligation to Reduce Carbon Emissions from
Government Operations
December 12, 2023**

Good afternoon, my name is Alia Soomro and I am the Deputy Director for New York City Policy at the New York League of Conservation Voters. Thank you, Chair Gennaro as well as members of the Committee on Environmental Protection, Resiliency and Waterfronts for the opportunity to testify today.

New York has some of the most ambitious climate laws in the country. In 2016, the City introduced “[80x50](#),” setting an ambitious target of 80% carbon emission reduction by 2050. In 2019, the City enacted Local Law 97, which requires many large buildings to cut their carbon emissions or face significant fines. Moreover, earlier this year, the City released [PlaNYC: Getting Sustainability Done](#), which outlines many goals, including maximizing climate infrastructure on City-owned property. Nevertheless, New York City’s government operations have a long way to go to cut its carbon emissions. According to the [2022 NYC Greenhouse Gas \(GHG\) Inventory](#), the three largest sources from government operations are: buildings, wastewater treatment plants, and transportation. While NYLCV appreciates the City’s leadership developing the *PlaNYC* report, as well as the City Council’s leadership in passing many important climate laws, such as Local Law 32 of 2023, which establishes new deadlines for the phase out of fuel oil grade no. 4 in private and publicly-owned buildings, at this point we must focus heavily on implementation of existing laws and policies and—perhaps most importantly—the need for robust funding and long-term capital planning.

Buildings

The vast majority of NYC’s GHG emissions come from our buildings. Local Law 97 requires a 40% reduction in emissions from City government operations by FY25 and a 50% reduction by calendar year 2030. According to the [2023 Mayor’s Management Report](#), in FY23, DCAS completed 582 energy efficiency projects in public facilities, a 37% increase from FY22, which DCAS estimates will reduce over 32,700 GHG emissions annually, the equivalent of removing nearly 7,300 cars from the road. However, DCAS fell short of targets for annual estimated reduction in GHG emissions from all energy projects and annual estimated avoided energy cost from all energy projects in FY23. While we recognize that supply chain disruptions and staffing shortages are partly to blame, we urge the City to get back on track to achieve its GHG reduction goals.

With the recent passage of City of Yes for Carbon Neutrality, NYLCV believes that our City is better equipped to make much-needed building retrofits to fight climate change. This zoning amendment will help the City meet its goal to install at least [100 MW of solar power on City-owned buildings by the end of FY25](#). According to the MMR, DCAS has installed 21.9 MW of solar photovoltaics as of the end of FY23, a 31% increase from FY22 and a 100% increase from FY20. Additionally, NYLCV supports Mayor Adams' ["Leading the Charge" program](#), which calls for the construction of all new city schools to be all electric and the conversion of 100 existing schools to all electric heating by 2030. This includes green technology such as solar panels, thermal energy networks, and upgrading current building systems to be more energy efficient to make our schools cleaner and reduce emissions. We hope the City stands by these goals and timely implements them.

Wastewater Treatment Plants

NYLCV supports the beneficial reuse of byproducts from the wastewater treatment process. We support building on-site anaerobic digesters at WWTPs that can turn waste (including potentially food waste) into renewable natural gas, reducing methane emissions from these plants and displacing fracked natural gas from the grid. We urge the City to take action to upgrade the DEP's WWTPs' digesters to process organic waste into lower carbon energy to reduce local pollution.

Transportation

Transportation is the third-largest source of GHG emissions in government operations, so electrifying the City's fleet is a key component in this transition. NYLCV supported the City's [Clean Fleet Plan](#), which commits the City to reducing City fleet GHG emissions by half by 2025. Even better, the goals and timeline outlined in the plan are closely aligned with the City Council's recently passed Local Law 140 of 2023, sponsored by Council Member Keith Powers. This law requires all light- and medium-duty vehicles procured by the city after July 1, 2025, to be zero-emission vehicles, and it requires all light- and medium-duty vehicles in the city's fleet to be zero-emission vehicles by July 1, 2035, with certain exceptions. Additionally, we urge the City to work towards the mandate for an all electric school bus fleet by 2035 (Local Law 120 of 2021). The City must continue working with utilities to invest in and expand electric vehicle charging infrastructure, especially for medium- and heavy-duty vehicles. Cleaner technology should be prioritized for vehicles with the highest average miles traveled and highest emissions, and those that largely operate in environmental justice communities.

Funding

Outlining all of these laws, goals, and programs highlights the urgency of allocating robust funding in order to fully implement them and take action against climate change. NYLCV would be remiss if we highlighted all these laws without underscoring the importance of fully funding and staffing City agencies to execute these plans.

NYLCV was deeply disappointed in the budget cuts announced in the Mayor's November Financial Plan. Although we understand the fiscal challenges facing our City today, with the climate crisis growing more urgent by the day, this is no time for New York City to cut funding for

vital services and other environmental programs. In fact, studies have shown that [electrifying buildings](#) and our [transportation sector](#) is cost effective in the long run, so these recent budget cuts directly undermine the Administration's goals laid out in *PlaNYC*.

Time and time again, the climate crisis has shown us the need for long-term capital planning. For example, as the City electrifies its buildings and fleet, the City must allocate capital funding for building retrofits and the purchase of small-, medium-, and heavy-duty vehicles, such as garbage trucks, snow plows, etc. We encourage the City Council to continue collaborating with advocates, City agencies such as OMB and DCAS, and utilities such as Con Ed and National Grid to ensure that electric vehicle charging infrastructure and energy storage systems are being built equitably throughout the City in the coming years. We also urge the City to produce a plan on capital spending and charging infrastructure for medium- and heavy-duty vehicles to identify challenges and solutions for implementation, such as charging infrastructure, funding, and procurement issues.

With numerous challenges facing the City, we must not lose sight of important climate deadlines and goals. We urge the City Council to continue working with advocates and the City to implement existing laws and allocate the requisite funding to implement them. Thank you for the opportunity to speak.



**NYC Environmental Protection, Resiliency, and Waterfronts
Oversight Hearing Testimony on Government Emissions Reduction
Dec 12, 2023**

Good afternoon, and thank you to Chair Gennaro and the members of the Environmental Protection, Resiliency, and Waterfront Committee. My name is Nina Guidice and I am the Policy Manager at Transportation Alternatives. Thank you for convening this oversight hearing on the City's progress on reducing government greenhouse emissions.

The climate emergency is the existential threat of our time. The planet is heating up at a rapid pace, and the local effects of the climate crisis are more visible than ever. In just the past year, we've seen smoggy skies, dangerous air quality, excessive heat waves, and flash flooding. It's clear: the planet will exceed the target of 1.5 degree warming in the coming years if we do not treat the emergency with the response it requires.

The City has taken steps to address emissions from buildings, and now is the time to act on transportation emissions. Transportation remains one of the largest sources of greenhouse gas emissions in New York City and demands a government response matching the severity and urgency of the problem. Our transportation systems are complex and multifaceted, but represent an enormous opportunity to advance climate justice, clean our air, improve public health, and make New York a livable city for generations to come.

The City has set a goal of reducing emissions by [80% by 2050](#). Given the nature of the climate crisis, we need a full commitment and robust action to achieve net-zero emissions before it is too late. We cannot achieve our current goals – let alone net-zero emissions – without an urgent shift to a green and sustainable transportation system in New York City.

According to the City's own greenhouse gas inventory, we are pleased to see that government emissions in the transportation sector have dropped 15%. It is clear that significant reductions in transportation emissions is possible, but we need to accelerate quickly.

While the City's internal operations make up 5.4% of the overall transportation emissions, the administration must lead by example and enact policies that will set city agencies as a model for sustainable transportation. That means everything from consolidating the size of the city's fleet to shifting to greener modes that can navigate our streets with a smaller footprint, like e-cargo bikes or other e-micromobility devices.

Several bills before the Council can help the City achieve its goals of lowering operations emissions. Intro 0611 would require carbon accounting in the preliminary and executive budgeting processes. How we spend our money is how we solve the climate crisis. Intro 0089 establishes a pilot to study greener street resurfacing materials, and Intro 0983 would mandate solar panels in certain parking lots. Embedding climate solutions into the City's practices will pay dividends over time.

The City should incentivize its workers to choose greener and more sustainable transportation options, and make it easier to do so. We call on the administration to study the most effective ways to provide and promote green commuter benefits, which includes tracking publicly how the over 300,000 City employees currently get to and from work, and potential methods to reduce the rate of employees driving alone to the office in the most congested parts of the City and where parking is most expensive.

Finally, the public deserves complete transparency as to what the City is doing to lower greenhouse gasses, especially with its internal operations. Going forward, the Council should set and track specific targets with interim goals by fuel type for the City's transportation emissions reduction (and reduce the number of vehicle miles traveled), inclusive of the City's own emissions reduction projects.



December 12, 2023

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**Testimony of WE ACT for Environmental Justice
to the New York City Council Committee on Environmental Protection,
Resiliency and Waterfronts on December 12, 2023 regarding the The
City's Obligation to Reduce Carbon Emissions from Government
Operations**

Dear Chair James Gennaro and Committee on Environmental Protection,
Resiliency and Waterfronts:

WE ACT for Environmental Justice, an organization based in Harlem, has been fighting environmental racism at the city, state, and federal levels for more than 30 years. We recognize and fight to remedy the negative cumulative impacts of unjust policies that have plagued communities of color for decades.

We are in the midst of a worsening climate crisis and the City must do everything it can to lead by example by aggressively investing in emissions reductions, buildings decarbonization, and fleet electrification of government operations; all with environmental and climate justice as the foundation of this work.

Green Healthy Schools

According to the 2022 City Government Inventory, 68% of emissions from government operations come from buildings.¹ As of FY19, the City agencies that produce the most emissions from buildings are the Department of Education (38% of all emissions from City-owned buildings).² This is why WE ACT is a strong supporter of Climate Works for All's [Green Healthy Schools](#)³ campaign (details attached) Mayor Eric Adams and the New York City Council to:

- Electrify and upgrade 500 public school buildings by 2030, prioritizing schools in environmental justice communities.
- Make NYC a zero emissions school district by 2040.

WE ACT also supports [Int 1183-2023](#) – Installation of solar photovoltaic systems on city-owned property. We urge that this bill be a priority for this committee next session and that all members of this committee

¹ NYC Mayor's Office of Climate and Environmental Justice, "NYC GHG Inventories", <https://climate.cityofnewyork.us/initiatives/nyc-greenhouse-gas-inventories/>

² Id., pg. 91

³ <https://alignny.org/wp-content/uploads/2021/06/Healthy-and-Green-Schools-Report-v4.pdf>



co-sponsor and pass this bill. This bill would require the Department of Citywide Administrative Services (DCAS), in coordination with the Mayor’s Office of Long-Term Planning and Sustainability, to complete the installation of 100 megawatts of solar photovoltaic systems on the roofs of city-owned buildings by the end of 2025 and 150 megawatts on the roofs of city-owned buildings and other properties, including parking lots and industrial areas, by the end of 2030. A plan to meet the 2030 threshold must be created by the end of 2026. The department would be required to maintain and operate the systems and prioritize buildings in disadvantaged communities. DCAS is severely behind on installing solar on school buildings. As of March 2022, DCAS has only installed 16.2 MW of solar PV panels across 110 buildings, approximately 16% of the City’s goal to install 100 MW of solar by 2025.⁴

Electric School Buses

In addition, WE ACT is a part of the [NYC Clean School Bus Coalition](#). With the support of Councilmember James Gennaro we successfully passed Local Law 120 of 2021 – mandating the transition to electric school buses by 2035. Despite the launch of the [Environmental Protection Agency’s Clean School Bus Program](#) and \$500 million from the Clean Water, Clean Air, Green Jobs Bond Act [to support the transition to zero-emission school buses](#), we are concerned that New York City will not reach Local Law 120 targets and is not acting with a sense of urgency to comply. This is due to the fact that most school buses in New York City are privately owned and not part of the municipal fleet. However, there are infrastructural needs that the City could address to make the transition easier.

WE ACT is asking the Committee on Environmental Protection Resiliency and Waterfronts to prioritize an oversight hearing on the status of Local Law 120 and the transition to electric school buses. It is important that we are getting a detailed understanding of the progress, barriers and solutions to transitioning our school bus fleet.

Wrong Direction and False Solutions

Last month WE ACT launched it’s [Wrong Direction Campaign](#) which examines the tangible and profound impacts of the current U.S. energy policy on individuals residing in environmental justice communities.

As the City makes strides in reducing greenhouse gas emissions – the energy landscape is transforming rapidly. Though there are positive outcomes, including increasing investment in wind and solar, there are also even more investments being made in untested and problematic energy

⁴ Id.



systems, sources, and infrastructure. These investments not only undermine the efforts to reduce carbon and methane emissions, they also reinforce decades of environmental racism that has made sacrificial zones out of Black, Indigenous, People of Color (BIPOC) and low income communities. It is important that the City do not fall short of our climate justice promises, and fight discriminatory policies that would continue to harm the health, livelihoods, and dignity of environmental justice communities.

WE ACT urges the City to reject carbon capture and sequestration (CCS), utilization (CCUS) and direct air capture projects as a way to reduce carbon emissions from government operations for these reasons:

- There is no technology that can currently capture 100% of carbon dioxide emissions from any polluting source.
- Carbon capture methods may lead to increased Nitrogen Oxide and particulate matter emissions despite greenhouse gas reduction.⁵
- Emissions savings from CCUS are fully offset by its use for crude oil drilling.⁶
- Some carbon capture technologies are energy intensive, offsetting emissions savings and putting additional pressure on cleaning up the energy grid.
- Captured and stored carbon may leak into the atmosphere at every step of the process, including in communities where carbon is captured and transported. Underground storage risks include contamination of clean water sources and increased chance of earthquakes.
- It's expensive.

New York City must adopt well-demonstrated approaches that avoid fossil fuel combustion, rather than false solutions like carbon capture technologies for buildings, as a means to decarbonize and make our city more sustainable.

Also, **WE ACT does not support the City's efforts to procure renewable diesel for medium- and heavy-duty vehicles.** Biodiesel fueled vehicles still produce carbon dioxide which contributes to the climate crisis, and New York City has been ravaged by extreme weather in recent years. Plus, harmful air pollutants that cause respiratory issues like asthma. New Yorkers have some of the highest asthma rates in the nation, with carbon

⁵ Koornneef, Joris et al. "The Impact of CO₂ capture in the power and heat sector on the emissions of SO₂, NO_x, particulate matter, volatile organic compounds and NH₃ in the European Union." *Atmospheric Environment* 44 (2010) 1369 - 1385, January 2010.

<https://www.sciencedirect.com/science/article/abs/pii/S1352231010000609>

⁶ Jacobson, M.Z., *100% Clean, Renewable Energy and Storage for Everything*, Cambridge University Press, New York, 427 pp., 2020.

<https://doi.org/10.1017/9781108786713>



dioxide being known to contribute to asthma and other respiratory ailments – including lung cancer.

We urge Mayor Adams to reconsider this plan. New Yorkers – especially people of color, who have had to face disproportionate health burdens from both air pollution and climate change for decades – deserve smart, bold actions. It would be a shame for the City to spend all that money for marginal improvements when it could make a sound, long-term investment that protects the health and well-being of all New Yorkers for generations to come – especially with the funds finally available to make this urgently necessary and inevitable transition through the Inflation Reduction Act.

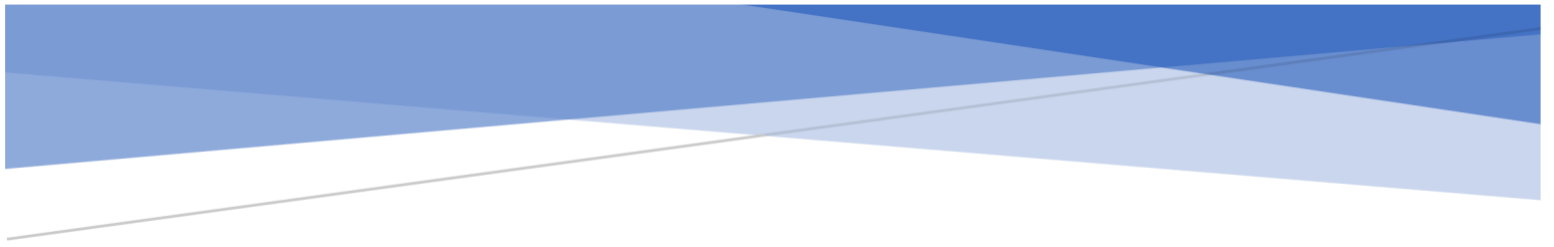
It is important that the City continues to lead by example when it comes to reducing carbon emissions across all sectors and aspects of government operations. We look forward to continued work with Chair James Gennaro, this committee and the City Council on this matter.

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SIERRA CLUB

New York City Council Committee on Environmental
Protection, Resiliency, and Waterfronts

**Hearing of December 12, 2023: The City's Obligation to Reduce
Carbon Emissions from Government Operations**

Wayne Arden, Karl Palmquist

Sierra Club

New York City Council
Committee on Environmental Protection, Resiliency, and Waterfronts

December 12, 2023, Hearing: Oversight – The City’s Obligation to Reduce Carbon Emissions from Government Operations

Chair Gennaro and Members of the Committee,

We are testifying on behalf of the Sierra Club, which represents nearly 15,000 members in NYC. In summary:

Municipal waste

The Sierra Club New York City Group supports the prioritization of producing compost through the City’s community composting program and through curbside collection of source-separated organics. The Sierra Club advocates for the prioritization of these strategies over anaerobic co-digestion of source-separated organic waste and sewage sludge (biosolids waste).

Anaerobic digestion and composting of organics waste are both effective strategies to reduce methane emissions compared to traditional landfill. Of these two strategies, composting has several advantages: the infrastructure for composting requires less capital expenditure and the greenhouse gas reductions from composting are greater than the case of anaerobic digestion, and compost can be used to improve soil health and resiliency.

Transportation

With some caveats, the Sierra Club New York City Group does not object to NYC’s use of renewable diesel (RD) — but only as an *interim* solution until NYC has fully converted the municipal fleet to zero-emission vehicles (ZEVs) per the ZEV for NYC Act ([Int. No. 279-A \(FINAL\)](#)).

Using RD instead of petroleum diesel in vehicles that are powered by compression engines (i.e., diesel engines) will result in a partial lowering of lifecycle greenhouse gas emissions. However, this change will not lower tailpipe emissions, and consequently it will not change NYC’s emissions profile. The pollutants that engines generate when combusting RD are about the same as when combusting petroleum diesel. Critically, substituting RD for petroleum diesel will not improve the respiratory health of New Yorkers who suffer from the effects of carbon monoxide and particulate emissions — especially those who live in environmental justice communities that are badly scarred by pollution from medium- and heavy-duty diesel-fueled vehicles. We urge NYC to get ahead of the deadlines stipulated in the ZEV for NYC Act by deploying ZEVs as quickly as possible.

Please refer to the subsequent testimony for more detailed discussion of these issues.

Sincerely,

Wayne Arden, Vice Chair Sierra Club New York City Group (transportation testimony)
Karl Palmquist, Chair Sierra Club New York City Group (municipal waste testimony)

December 12, 2023

Municipal Waste

Emissions from wastewater treatment plants and beneficial use of organics waste

Although the Sierra Club does not oppose the use of anaerobic digesters at wastewater recovery facilities (WWRFs) to harness methane-rich biogas from biosolids waste, we do oppose the co-digestion of source-separated organics with biosolids waste, and we oppose the use of biogas for residential and commercial use. A 2021 report from the National Renewable Energy Laboratory found that composting has lower operating and maintenance costs, while offering similar or increased job potential, as compared to anaerobic digesters. This same report showed that composting has greater potential to reduce greenhouse gas emissions, with reductions being 2-3 times greater than anaerobic digestion, if land application of digestate is prohibited.¹ In the following testimony, we argue that although both anaerobic digestion at WWRFs and composting reduce methane emissions, as compared to landfills, composting offers several distinct advantages.

Issues associated with anaerobic digestion at WWRFs

NYC has laid out plans to increase the usage of anaerobic digestion to obtain methane-rich biogas from the co-digestion of biosolids waste and source-separated organic waste consisting mostly of food scraps and yard waste. However, there are a few issues with anaerobic digestion at WWRFs. First, two studies from Princeton University show that methane emissions from wastewater treatment plants exceed estimates using emissions guidelines from the EPA and IPCC.² These researchers argued that methane emissions from WWRFs, which are higher at facilities that use anaerobic digesters, are due to leaky or malfunctioning equipment. Furthermore, a 2020 briefing from the NRDC underscored that burning biogas also generates harmful air pollutants, such as nitrous oxides.³

Second, anaerobic digestate produced from the co-digestion of source-separated organic waste and biosolids waste should be landfilled — meaning there is no “beneficial use” for the digestate. This is due to the fact that, as outlined in a recent Sierra Club report,⁴ biosolids waste

¹ Milbrandt, Anelia. 2021. *Comparison of Select Food Waste Utilization Options*. Golden, CO: National Renewable Energy Laboratory. NREL/BR-6A20-81024. <https://www.nrel.gov/docs/fy22osti/81024.pdf>.

² Colton Poore, “Wastewater sector emits nearly twice as much as previously thought.” Andlinger Center for Energy and the Environment, February 28, 2023. [https://environment.princeton.edu/news/wastewater-sector-emits-nearly-twice-as-much-methane-as-previously-thought/#:~:text=But%20when%20anaerobic%20digesters%20operate,methane%20emissions%2C"%20Song%20s aid](https://environment.princeton.edu/news/wastewater-sector-emits-nearly-twice-as-much-methane-as-previously-thought/#:~:text=But%20when%20anaerobic%20digesters%20operate,methane%20emissions%2C)

³ NRDC (June 2020). *A Pipe Dream or Climate Solution? The Opportunities and Limits of Biogas and Synthetic Gas to Replace Fossil Gas* [Issue Brief]. <https://www.nrdc.org/sites/default/files/pipe-dream-climate-solution-bio-synthetic-gas-ib.pdf>

⁴ Frisch, Miller, Scher, Palmquist, “Sewage Sludge Fertilizer Contaminates Farms with Toxic PFAS” [Report of the Sierra Club Atlantic Chapter]. June 2023. <https://www.sierraclub.org/atlantic/report-sewage-sludge-fertilizer-contaminates-farms-toxic-pfas>

contains many harmful chemicals — including those called “forever chemicals” — that contaminate soil and our waterways. Although source-separated organic waste has beneficial uses, such as when it is turned into compost, mixing food waste with sewage sludge eliminates any beneficial use.

Third, although anaerobic co-digestion of source-separated organic waste and biosolids waste offers the opportunity to capture methane-rich biogas for energy and heating purposes, we argue that this is unnecessary. NYC is aiming to power government operations with 100% clean electricity by 2025.⁵ Instead of allowing the entire grid to become electrified, transmitting biogas from WWRFs to buildings requires continued use and maintenance of preexisting natural gas infrastructure. A 2020 report from RMI underscores that continued reliance on aging natural gas infrastructure is an expensive option, with NYC having one of the oldest active gas mains in the country at the time the report was published.⁶

Issues related to transportation to WWRFs

The goal of diverting organic waste (e.g., food waste, yard waste, etc.) from landfills is critical for NYC to achieve its climate goals. However, the approach to dealing with organic waste that involves diverting this waste stream for anaerobic digestion at WWRFs has several problems. First, as can be seen on the map below (blue arrows), WWRFs are centralized and frequently⁷ occur in environmental justice communities. Not all WWRFs currently accept organic waste for anaerobic digestion, but WWRFs are a likely location for future digesters. Currently, the DEP WWRF at Newtown Creek (long arrow) is the main site where anaerobic co-digestion of source-separated organic waste takes place,⁸ placing excess burden on the surrounding environmental justice community.

As an alternative to centralized processing of organic materials, many neighborhoods in NYC have community gardens that participate in community composting programs that accept such waste. For example, as can be seen on the map below (green arrow), the NYC Compost Project supports many community gardens throughout the five boroughs to accept food waste from NYC residents. Many of these community gardens perform composting onsite. Those that do not perform composting onsite give the food scraps they collect to the NYC Compost Project, where composting occurs at one of seven host sites across the city.

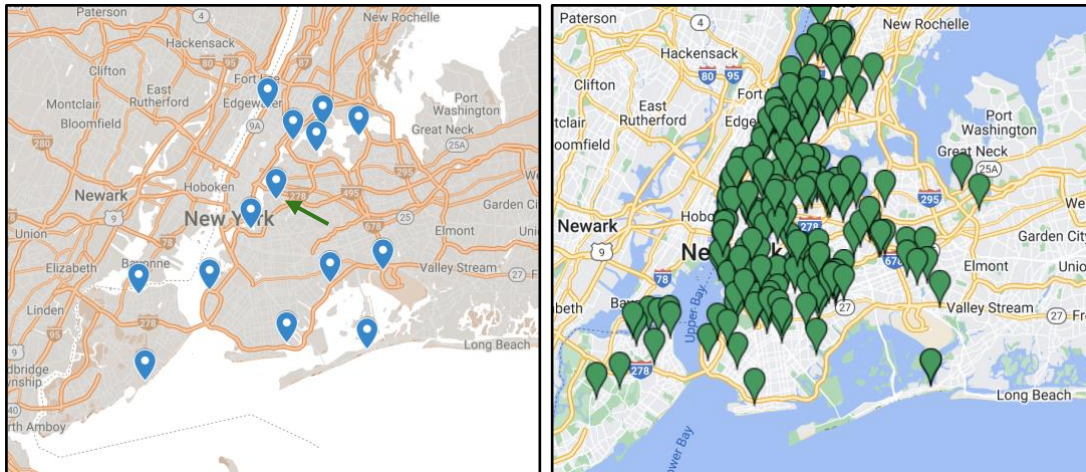
⁵ NYC Mayor’s Office of Climate and Environmental Justice <https://climate.cityofnewyork.us/subtopics/systems/#:~:text=New%20York%20State%20is%20currently,these%20projects%20for%20City%20operations.>

⁶ Hennen, Kroh, “A New Approach to America’s Rapidly Aging Gas Infrastructure.” January 6, 2020. <https://rmi.org/a-new-approach-to-americas-rapidly-aging-gas-infrastructure/>

⁷ Our analysis finds 10 of NYC’s 14 WWRFs are in EJ Areas or Potential EJ Areas.

⁸ Department of Environmental Protection (June 14, 2023). *Project Diverts Organic Waste from Landfills, Reduces Greenhouse Gas Emissions, Improves Air Quality and Produces Enough Renewable Energy to Heat up to 5,200 Homes* [Press Release]. <https://www.nyc.gov/site/dep/news/23-026/dep-epa-national-grid-celebrate-innovative-project-converts-wastewater-renewable#/0>

From the above analysis, it is not immediately clear how to compare transportation-related emissions related to composting — which includes decentralized community composting and more centralized municipal composting at the DSNY facility in Fresh Kills on Staten Island — with transportation-related emissions from transporting source-separated organic waste to WWRFs. We further recommend that, as the City considers its use of anaerobic digesters to co-digest source-separated organic waste with biosolids waste, it examines the transportation-related emissions.



Wastewater Recovery Facilities (WWRF)

Food Scrap Drop-Off Locations

New York City soil can handle municipal compost

The USDA’s Climate-Smart Agriculture program highlights numerous benefits from applying compost to soil, including increased soil organic matter (SOM) and soil organic carbon (SOC), improved plant health, robust soil microbial communities, enhanced water holding capacity and infiltration, and decreased soil compaction.⁹ We recommend that NYC develop plans to increase its compost production such that these potential benefits can be realized on NYC’s soils.

A 2021 report from the National Renewable Energy Laboratory found that composting facilities and anaerobic digestion facilities have similar yearly operating and maintenance costs. However, the capital costs of anaerobic digestion facilities are approximately twice that of composting facilities. Furthermore, composting facilities offer more jobs at small, decentralized facilities (those that process less than 5,000 tons/year) than anaerobic digestion facilities. Lastly, this report estimates that while anaerobic digestion, without land application of

⁹ Emilie Winfield, “Climate-Smart Agriculture: Compost Amendments.” USDA Climate Hub, UC Davis John Muir Institute of the Environment.

https://www.climatehubs.usda.gov/sites/default/files/WLIC%20Fact%20Sheet%202_Compost.pdf

digestate, reduces greenhouse gas emissions by 0.04 to 0.06 MTCO₂E/ton, composting reduces greenhouse gas emissions by 0.12 MTCO₂E/ton.¹⁰

In total, there are approximately 138.44 sq. mi. of pervious area in NYC, summed over the 5 boroughs, according to the DEP's Citywide Parcel-Based Impervious Area Study.¹¹ Approximately 10.63 sq. mi. of this total area is forested land,¹² where compost is not needed. If we assume that this area contains soil and can be amended with compost, we can then determine the amount of compost that can be used on this area. We also assume that, on average, these soils can be amended with compost at a depth of 1 inch, twice per year.¹³ Although some soils require less, and some require more, this average should be an appropriate approximation. With these assumptions in mind, we can estimate the amount of compost NYC soils can accept during a one-year period.

Cubic feet of compost (volume) = depth of compost * area of amended soil

½ cubic ft. per sq. ft. of compost. = [2 in. or ⅙ ft.] * [1 sq. ft.]

593*10⁶ cubic ft. of compost = [⅙ ft.] * [127.81 sq. mi. or 3.56*10⁹ sq. ft.]

We can then compare the amount of compost that NYC soils can accommodate with an estimation of the amount of compost NYC could produce, yearly. The DSNY estimates that approximately 1.1 million tons, or 2.2*10⁹ lbs., of organic waste are generated from NYC residences every year. We can assume that there is a 50% reduction in weight during the composting process (a highly variable number and this is a conservative estimate), and we can estimate that one cubic foot of compost weighs 40 lbs.

Compost produced = [lbs. of organic waste] * [1 cubic foot of soil/40 lbs. of soil] * [0.5 reduction in weight during composting]

27.5*10⁶ cubic ft. of compost = [2.2*10⁹ lbs.] * [1/40] * [0.5]

¹⁰ Milbrandt, Anelia. 2021. *Comparison of Select Food Waste Utilization Options*. Golden, CO: National Renewable Energy Laboratory. NREL/BR-6A20-81024. <https://www.nrel.gov/docs/fy22osti/81024.pdf>.

¹¹ NYC Department of Environmental Protection (June 23, 2020). *DEP's Citywide Parcel-Based Impervious Area Study* [Webinar]. <https://www.nyc.gov/assets/dep/downloads/pdf/water/stormwater/dep-citywide-parcel-based-impervious-area-study-presentation.pdf>

¹² <https://www.nycgovparks.org/learn/ecosystems/forests-in-new-york-city-parks#:~:text=New%20York%20City%20is%20home,Wallenberg%20Forest%20in%20Seton%20Park.>

¹³ Miller, Mann, "How to Use Compost in Gardens and Landscapes." Oregon State University Extension Service, February 2021. <https://extension.oregonstate.edu/sites/default/files/catalog/auto/EM9308.pdf>

Conclusions

NYC permeable land is sufficiently vast that it can handle the total volume of compost that NYC could produce in one year. If desired, and with necessary consultation of the appropriate agencies and departments, this means that NYC could increase its compost production without needing to move produced compost out of the city.

The Sierra Club New York City Group supports the prioritization of producing compost through the City's community composting program and through curbside collection of source-separated organics. The Sierra Club advocates for the prioritization of these strategies over anaerobic co-digestion of source-separated organic waste and sewage sludge.

Transportation

ZEV for NYC Act overview

On September 28, just after Climate Week NYC, NYC council members voted unanimously 47-0 in favor of the ZEV (Zero-Emission Vehicle) for NYC Act ([0279A](#)) sponsored by Majority Leader Powers. Mayor Adams signed the bill on October 23. NYC must begin acquiring only zero-emission motorcycles, light- and medium-duty vehicles by mid-2025 and heavy-duty vehicles by mid-2028, with some limited exceptions. The City committed to deploying only zero-emission motorcycles, light- and medium-duty vehicles by mid-2035 and heavy-duty vehicles by mid-2038.

We should think of the ZEV for NYC Act as our north star — guiding the City’s efforts to reduce transportation emissions. The Act requires the mayor to submit to the comptroller and the speaker of the council a report detailing the City’s purchase of vehicles during the immediately preceding fiscal year, including ZEVs. We urge the Adams administration to adhere to the purchasing deadlines of the ZEV for NYC Act as soon as possible, and we remind the NYC Council and the public that the Act included the above strengthened transparency requirement. The intent of the ZEV for NYC Act is not to lessen municipal transportation emissions, rather it is to eliminate them. And as with any homework assignment, one usually gets the best grade by starting work without delay.

Renewable diesel

With some caveats, the Sierra Club does not object to NYC’s use of renewable diesel (RD), but this use should be only an *interim* solution until NYC has fully converted the municipal fleet to ZEVs. RD is made from biomass rather than petroleum, and thus fueling vehicles with RD is partially consistent with the fundamental climate crisis goal of eliminating the use of fossil fuels. According to a 2022 study conducted by scientists at Argonne National Laboratory, RD reduces lifecycle greenhouse gas (GHG) emissions in a range of 40% to 86%, depending on the production process.¹⁴ Indeed, while we submit this testimony the very goal of eliminating humankind’s self-destructive dependence on fossil fuels was under attack at COP28 in Dubai. Per the New York Times, Saudi Arabia tried to block a deal to end the use of fossil fuels.¹⁵ Ultimately, delegates agreed to this nonbinding statement: “...Transitioning away from fossil

¹⁴ Hui Xu et al., “Life Cycle Greenhouse Gas Emissions of Biodiesel and Renewable Diesel Production in the United States,” American Chemical Society, Environmental Science & Technology Volume 56 7512-7521, May 16, 2022, Abstract section, Discussion section, <https://pubs.acs.org/doi/10.1021/acs.est.2c00289>.

¹⁵ Lisa Friedman, Brad Plumer, Vivian Nereim, <https://pubs.acs.org/doi/10.1021/acs.est.2c00289> *The New York Times*, December 10, 2023, <https://www.nytimes.com/2023/12/10/climate/saudi-arabia-cop28-fossil-fuels.html>.

fuels in energy systems, in a just, orderly and equitable manner, accelerating action in this critical decade, so as to achieve net zero by 2050 in keeping with the science.”¹⁶

RD is a drop-in fuel, meaning it is chemically identical to petroleum diesel. An alternative to RD is biodiesel. The biodiesel production process, transesterification, introduces oxygen into the fuel. Consequently, most engines designed for petroleum diesel cannot operate on 100% biodiesel; a commonly supported blend is B20: 20% biodiesel and 80% petroleum diesel. By contrast, standard diesel engines can combust R100 (100% RD). By using RD instead of petroleum diesel and dropping biodiesel as a fuel altogether, NYC can reduce, but not eliminate, lifecycle GHG emissions.

If NYC substitutes RD for petroleum diesel, then tailpipe emissions will unfortunately remain largely unchanged. Combustion will still be occurring in vehicle engines. Consequently, there will be no material reduction in NYC’s transportation emissions profile. Two studies, one funded by the California Air Resources Board (CARB)¹⁷ and a second performed by the National Renewable Energy Laboratory (NREL),¹⁸ found that switching from petroleum diesel to RD has little impact on emissions. The CARB study found no statistically significant differences for nitrogen oxide, particulate matter, or carbon monoxide emissions in on-road compression (i.e., diesel) engines when combusting R100 versus petroleum diesel. Both studies found use of R100 reduced carbon dioxide emissions by 3% to 4% versus petroleum diesel.^{19 20} However, since R100 has about a 4% lower volumetric heating value than petroleum diesel this modest advantage is lost — NYC vehicles will travel no more miles using RD than when using petroleum diesel.²¹ Use of RD will not reduce the GHG emissions of NYC’s municipal fleet, and it will not improve the respiratory health of New Yorkers who suffer from the effects of carbon monoxide and particulate emissions — especially those who live in environmental justice communities that are badly scarred by pollution from medium- and heavy-duty diesel-fueled vehicles.

Two mitigations

In summary, NYC’s use of RD should be only an interim step. We recommend two mitigations.

¹⁶ United Nations, Framework Convention on Climate Change, Conference to the Parties serving as the meeting of the Parties to the Paris Agreement (COP28), UAE, 30 November to 12 December 2023, Agenda item 4, First global stocktake, 13 December 2023, downloaded December 2023, https://unfccc.int/sites/default/files/resource/cma2023_L17_adv.pdf.

¹⁷ Dr. Thomas D. Durbin et al., “Low Emission Diesel Study: Biodiesel and Renewable Diesel Emissions in Legacy and New Technology Diesel Engines,” prepared for CARB, November 2021, downloaded December 2023, https://ww2.arb.ca.gov/sites/default/files/2021-12/Low_Emission_Diesel_Study_Final_Report.pdf.

¹⁸ Kenneth Kelly, Adam Ragatz, “Economy and Emissions Impacts from Solazyme Fuel in UPS Delivery Vehicles,” NREL, Technical Report NREL/TP-5400-68896, August 2018, downloaded December 2023, <https://www.nrel.gov/transportation/fleettest-fuels-diesel.html>.

¹⁹ CARB study page xvi; NREL Report page 10.

²⁰ The NREL study found a 4.1% reduction in nitrogen oxide (NOx) emissions (page 10). It did not assess particulate matter or carbon monoxide emissions.

²¹ The NREL report determined that the volumetric heating value of Solazyme’s RD was 4.2% lower than standard ultra-low-sulfur diesel (ULSD). RD heating values vary somewhat depending on the production process. See page 6.

Sierra Club

First, RD can be made from many types of biomasses, but some types result in higher lifecycle GHG efficiencies than others. The Argonne study found that RD made from waste or byproduct feedstocks such as tallow, used cooking oil, or distillers corn oil result in GHG reductions of 79% to 86% versus petroleum diesel. By contrast, RD made from oilseed crops such as soybean or canola resulted in GHG reductions of only 40% to 69%.²² In addition, economic analyses have determined that a consequence of producing biofuel from crops that also serve as important sources of human food is higher food prices. In 2021, the International Clean Council on Transportation (ICCT) published a report summarizing the findings of 15 studies that analyzed the impact of biofuels on U.S. corn prices. The ICCT concluded “biofuel demand driven by the Renewable Fuel Standard (RFS) has increased the price of corn in both domestic and global markets.”²³ For these two reasons, higher GHG efficiency and little to no food price impact, we strongly urge NYC to purchase RD from suppliers that use waste or byproduct feedstocks in their production processes.

Second, we would like to propose a specific goal to help NYC get a jump-start on its ZEV for NYC Act homework. The Act requires NYC to begin purchasing only zero-emission motorcycles, light-duty, and medium-duty vehicles starting July 1, 2025. The 2024 NYC Marathon will take place on Sunday November 3, 2024. We urge NYC, working in partnership with New York Road Runners, to conduct the world’s first ZEV marathon. The NYPD and New York Road Runners would need to manage the marathon using only zero-emission motorcycles, sedans, and crossovers or SUVs, but the number of vehicles required is not large. This event would better prepare NYC for the July 1, 2025, purchasing deadline, and it would demonstrate NYC’s leadership in the global fight against climate change, leadership that is much needed at COP conferences.

North Star

The ZEV for NYC Act is NYC’s north star regarding transportation emissions. The best outcome for New Yorkers is for NYC to deploy ZEVs as quickly as possible, eliminating the use of liquid fuels and their resulting tailpipe emissions altogether.

²² Hui Xu et al., “Life Cycle Greenhouse Gas Emissions of Biodiesel and Renewable Diesel Production in the United States,” Abstract section.

²³ Jane O’Malley Stephanie Searle, “The impact of U.S. Renewable Fuel Standard on food and feed prices,” ICCT, January 2021, page 9, downloaded December 2023, <https://theicct.org/sites/default/files/publications/RFS-and-feed-prices-jan2021.pdf>.



My name is Anna Pavlova, and I am with a New York City start-up company called CarbonQuest.

As the City contemplates how to reduce emissions from its buildings, the city should a. lead by example by conducting decarbonization retrofits of its buildings, and b. serve as a demonstration ground for innovation. Demonstrating various technologies that can speed up decarbonization will not only attract innovators and new types of jobs to

the city, but will also chart a path forward to buildings subject to LL 97 and to other urban areas.

When we consider building decarbonization, we must adjust our approach from the times when our focus was solely on energy conservation. I spent most of my career in energy efficiency, and when the industry speaks about the “first fuel,” they mean that efficiency can be equally done and achieved in all buildings.

But when we talk about emissions reductions, not buildings are the same. Many factors affect

buildings ability and speed with which they can reduce emissions. In some larger buildings such as those primarily owned by the city, there may not be boilers but complex systems like combined heat and power or fuel cells that serve resilience requirements as critical infrastructure and are therefore fully or partially independent from the grid. Some of these cannot go back on the grid. In some other cases, boilers and heating equipment is new and the building or building complex is so large that immediate electrification will require either very large sums and/or moving tenants from

prolonged periods. In other words, to achieve decarbonization we must understand that not all buildings are the same and the speed of electrification will be different, and the costs will vary greatly, for different buildings, especially those over 100,000 square feet.

The city can showcase innovation in both heat pumps but also additional technologies by installing various new technologies in city buildings.

Our company offers a solution that can be installed in buildings that will otherwise not electrify

any time soon – capturing the buildings carbon and re-using it in products like green concrete.

This application works well in buildings with combined heat and power, buildings where heating systems that are fairly new and where the costs of electrification at this moment are too prohibitive to engage in electrification in the next fifteen years.

We work with clients where electrification studies show costs that are at least 5 times more than our solution, and where other operational complexities are preventing these buildings from electrifying soon.

In addition to ensuring that as many buildings as possible implement real measures NOW, we also meaningfully contribute to the local green economy.

The city already has a preference for purchase of Green Concrete for public buildings in the city. Concrete with better environmental attributes consists of a. some materials that displace cement and b. of mineralization of CO₂. In other words, CO₂ that used to be a gas during combustion process is captured, made into liquid and then permanently mineralized- becomes rock during concrete making process. This disposal of CO₂ is

permanent, but it only makes sense if the feedstock CO₂ is recycled- i.e. captured. Even better if it is captured locally, to avoid transportation emissions.

When we capture CO₂ from buildings, we turn it into liquid on site. It is in a liquid tank, exactly the same tank that you see in a NYC hospital or a lab and slightly bigger than the one at every restaurant in the city.

We can then sell it to a concrete manufacturer who can turn it into rock forever. But again, it needs to be recycled, not delivered from a Texas gas flare

as most of the commodity market CO2 in our region is.

We encourage the city to put in a system in one or more of the most suitable buildings and then purchase the concrete blocks with the captured CO2 for repairs or new building construction. Our technology can be combined with energy efficiency, rooftop solar and other technologies. A series of city buildings with such showcase technologies will generate additional union jobs in the city and promote the city as an innovation hub that is open to start-ups in the climate tech space. And most

importantly, lead to significant emissions reductions right now, even in complex operational building environments.

Thank you for your time.

Anna Pavlova

Senior Vice President, Strategy

CarbonQuest

www.carbonquest.com

Dear City Council Members,

I am extremely disappointed to learn that the city is planning to defund community composting as part of the Program to Eliminate the Gap (PEG) cuts to the Department of Sanitation.

Compost in NYC is as much about building healthy communities as it is building soil structure, and the work of the NYC Compost Project and GrowNYC is essential to our city.

I cannot stress enough the urgency of reinstating the funding for the NYC Compost Project and GrowNYC's compost programming, and enabling them to continue their vital work of education, diverting food scraps from landfills, and making the city a healthier, cleaner, and more resilient place to live and work. If these programs are removed from the budget, the city's Zero Waste goals are imperiled, and the jobs of 115 workers from 9 non-profit organizations will be lost. Cutting these jobs, 53 of which are union, is unacceptable.

We cannot allow this colossal environmental setback on our watch; New Yorkers deserve better.

Please reverse these cuts to community composting programs and vote NO to the Mayor's cuts to this essential program in order to save union jobs and make our city more sustainable. The Council must also fight for this program going forward by ensuring sufficient funding in the 2024 budget this spring. The Council should also mandate that this program exist through legislation, which would make it permanent

Thank you,
Emmy Weissman
Manhattan

Dear City Council Members,

I am extremely disappointed to learn that the city is planning to defund community composting as part of the Program to Eliminate the Gap (PEG) cuts to the Department of Sanitation. Compost in NYC is as much about building healthy communities as it is building soil structure, and the work of the NYC Compost Project and GrowNYC is essential to our city. Moreover, this program is NOT expensive; it's a drop in the bucket at only 0.3% of the Sanitation budget, and yet it has huge environmental benefits and is immensely popular.

I cannot stress enough the urgency of reinstating the funding for the NYC Compost Project and GrowNYC's compost programming and enabling them to continue their vital work of education, diverting food scraps from landfills, and making the city a healthier, cleaner, and more resilient place to live and work. If these programs are removed from the budget, the city's Zero Waste goals are imperiled, and the jobs of 115 workers from 9 non-profit organizations will be lost. Cutting these jobs (53 of which are union) is unacceptable.

We cannot allow this colossal environmental setback on our watch; New Yorkers deserve better.

Please reverse these cuts to community composting programs and vote NO to the Mayor's cuts to this essential program to save union jobs and make our city more sustainable. The Council must also fight for this program going forward by ensuring sufficient funding in the 2024 budget this spring. The Council should also mandate that this program exist through legislation, which would make it permanent.

Thank you,
Fannie Chen
Manhattan

12/14/23

Dear City Council Members,

Community composting not only enriches and strengthens the people of New York but it also nurtures and protects the environment in ways few other initiatives can achieve. Community composting is an actual existing, effective and cost-efficient means that both strengthens our environment and combats increasing stresses contributing to a global mental health crisis. It is asinine, irrational and retrograde to reverse this progress when we are already so far behind in efforts to address the climate crisis, when these programs have worked so hard for so long with so little and when what we so desperately need is to expand these programs, not eliminate them. We must not go backwards!

While NYC may be a global leader in some areas, historically in sanitation and presently in addressing the climate crisis the record is dismal. The importance of these two interconnected areas has not been valued or taken seriously. Whether it was the role of organized crime in the sanitation sector or the prioritizing of extractive economic, market driven policies destructive to the environment, we can no longer afford to be shortsighted. Community composting is a simple, cost-effective and forward-looking solution with multiple, cascading benefits to people and the environment that must be supported and expanded.

While composting is commonly recognized for its vital ability to build soil structure, community composting's contribution to building and enriching community structure is not fully recognized or valued enough. Community composting is a viable and critical mental health resource providing individuals with much needed community interaction. It's an actual tool of empowerment - providing individuals with one of the few available opportunities to actively participate in efforts to mitigate the climate crisis. This may sound dubious or trivial, but 'climate anxiety' and 'eco-anxiety' are real, documented phenomena increasing experienced by adults and young people. With community composting it is not only that you're doing something in the present to mitigate the climate crisis by reducing green house gas emissions but you're also producing a valued good for the future by creating nutrient dense soil.

Community composting additionally gives individuals the agency and opportunity to participate in a climate solution with human interaction that is both rare and invaluable. I've personally experienced how drop-off sites provide a vibrant node of human interaction. I've witnessed how our city's elderly and retiree populations eagerly participate and engage in conversations with other participants as well as composting staff. Conversations I have had with these folks make it clear that community composting is a vivacious and joyous community activity, meeting space and resource. I've also observed how composting staff reach out by offering an extra-hand and to help regulars (in particular the elderly) in areas outside of composting when requested. Composting staff have also served as acute observers of the health and well being of their regulars. If anything, these composting sites are under appreciated and under-used resource. Community composting possess tremendous potential to serve as robust community hubs. Support for these should be expanded not eliminated. We would be fools to turn our backs on such a enriching, human-centered, cost-efficient and promising means to build and support our communities, combat the climate crisis and nurture our precious, fragile planet.

Thank you,
Jeanne Lawler
Resident of the Manhattan Borough

Dear City Council Members,

I am extremely disappointed to learn that the city is planning to defund community composting as part of the Program to Eliminate the Gap (PEG) cuts to the Department of Sanitation. Compost in NYC is as much about fighting climate change and building healthy communities as it is building soil structure, and the work of the NYC Compost Project and GrowNYC is essential to our city.

I cannot stress enough the urgency of reinstating the funding for the NYC Compost Project and GrowNYC's compost programming, and enabling them to continue their vital work of education, diverting food scraps from landfills, and making the city a healthier, cleaner, and more resilient place to live and work. If these programs are removed from the budget, the city's Zero Waste goals are imperiled, and the jobs of 115 workers from 9 non-profit organizations will be lost. Cutting these jobs, 53 of which are union, is unacceptable. This program is not expensive; coming in at only 0.3% of the Sanitation budget, it is a drop in the bucket, and yet it has proven to be effective as well as immensely popular.

We cannot allow this colossal environmental setback on our watch; New Yorkers deserve better.

Please reverse these cuts to community composting programs and vote NO to the Mayor's cuts to this essential program in order to save union jobs and make our city more sustainable. The Council must also fight for this program going forward by ensuring sufficient funding in the 2024 budget this spring. The Council should also mandate that this program exist through legislation, which would make it permanent

Thank you,
Jennifer Lapper
Brooklyn

Save Community Compost Testimony

To: Committee on Environmental Protection, Resiliency and Waterfronts

Committee members, I am writing to express my testimony due to Mayor Adams' recently proposed budget cuts which will defund community composting programs across the city. I am deeply disappointed to hear that Mayor Adams has chosen to defund these valuable programs. In the face of global climate change and environmental degradation, it is irresponsible and frankly unacceptable to defund sustainable programs. Community composting provides numerous benefits to our city. For example, composting is a form of responsible waste management and offers a simple and effective solution to the city's rat infestation. Food and organic matter is also a major contributor to landfill waste, where it becomes a problem—it must be transported long distances, which requires fossil fuels, and it releases methane (a greenhouse gas) because it can not biodegrade properly in landfills. Composting turns organic waste into a climate-friendly resource—it can properly biodegrade and serve as fertilizer for city green spaces. Composting organizations, like GrowNYC and the Lower East Side Ecology Center, also provide green jobs and community hubs. These organizations help New Yorkers connect and learn skills, empowering us to lead more sustainable lives. As a life-long New Yorker, and a young person coming of age in a time of climate crisis, I urge you to refund community composting and prioritize other environmentally-focused programs and legislation.

Layla, Brooklyn

To: Members of the New York City Council

Re: Community composting program

Date: 12/14/23

Dear Council members,

I write today to urge you to reinstate funding for the community composting program in New York. Please restore funding to the several non-profit organizations that make drop off and local processing of kitchen and yard waste available to New Yorkers.

Cutting this funding is short-sighted. Composting is one of the easiest, most cost effective and environmentally sound ways to manage New York's waste stream. Hundreds of households have come to rely on the ability to drop off their waste at farmers markets and dozens of organizations rely on the compost produced by this waste for their community gardens, farms and beautification projects.

The program reduces the overall waste stream, provides jobs and creates a valuable product. The amount of money it takes to run this program is a tiny portion of the NYC budget. It defies logic that cutting it has an impact on the overall budget compared to the huge costs of, say, funding the Police Department. You could probably save millions more by just redesigning police uniforms to have one fewer button on them!

It is penny wise and pound foolish to cut this program, as the waste that it currently handles returns to the normal waste stream and costs for that will most likely rise.

Thank you for considering this request, and for your service to the great city of New York. I hope you will do the right thing.

Lisa Shufro



Brooklyn, NY 11231

Dear City Council Members,

I am extremely disappointed to learn that the city is planning to defund community composting as part of the Program to Eliminate the Gap (PEG) cuts to the Department of Sanitation. This would be an insane blow to both the community and the environment; the work of the NYC Compost Project and GrowNYC is essential to our city.

I've lived here for seven years and nearly every week I take produce scraps to the Union Square greenmarket. It reduces unnecessary waste, it keeps unwanted pests from my apartment (I'm able to keep these scraps in the freezer until I take them to compost) AND keeps rats from going through the trash to get at it! Food waste sitting out on the street in plastic bags is a feast for rats, and diverting this waste through community composting is one of the most cost effective preventive measures the City can take.

Further, it simply doesn't make sense to defund community composting from a financial perspective. It's such a small part of the sanitation budget (0.3%) while proving extremely effective and popular! This isn't some ineffective "well we tried" measure, it has been shown to be extremely beneficial to the community and something residents are keen to keep!

I cannot stress enough the urgency of reinstating the funding for the NYC Compost Project and GrowNYC's compost programming, and enabling them to continue their vital work of education, diverting food scraps from landfills, and making the city a healthier, cleaner, and more resilient place to live and work. If these programs are removed from the budget, the city's Zero Waste goals are imperilled, and the jobs of 115 workers from 9 non-profit organisations will be lost. Cutting these jobs, 53 of which are union, is **unacceptable**.

We cannot allow this colossal environmental setback on our watch; New Yorkers deserve better.

Please reverse these cuts to community composting programs and vote NO to the Mayor's cuts to this essential program in order to save union jobs and make our city more sustainable. The Council must also fight for this program going forward by ensuring sufficient funding in the 2024 budget this spring. The Council should also mandate that this program exist through legislation, which would make it permanent

Thank you,

Mary Jones
Manhattan

Restore Cutbacks to Compost Educators

Composters teach student to divert organic waste from the landfill by transformation of left over food through a nature based chemical process of biodiversity.

Biodiversity in the mitigation hierarchy of ecosystem service is the type of critical thinking that Compost programs offer to urban students. Since the New York City Department of Education lacks the dedicated funding to have an organic coordinator for custodial services or have an urban soil education curriculum, teachers turn to outreach community service providers such as EarthMatter, Grow NYC, NYC Compost and Big Reuse.

As New York transitions from fossil fuel to Renewable Energy, Battery Energy Storage Sites, landscaping will be an important variable in community consensus. How will citizens decide what type of landscaping makes the best use of their tax dollars? How will they understand the importance of Green Power Markets where 9.3 Billion is invested and projected to grow to 103.2 Billion by 2030? In the Green markets to meet the required Climate Leadership and Community Protection Act (CLCP), the Federal Regulatory Energy Commission has set up controversial rules that may or may not help the New York Independent Service Operators (NYISO). How will the critical thinker decide on what is in the best interest of the environment?

Restore the funding to educate community composters.

Pablo Ortega Garcia BFA MA
Earth Science Education
[REDACTED]
New York, NY 10002-1334

Dear Council,

I am writing to express my enthusiasm and support for the initiative to make composting a basic and necessary public service norm in our city. As a fellow New Yorker, I have been volunteering to compost at our local community garden Lydia's Magic Garden for a few years and have witnessed firsthand the benefits it brings to our environment. Composting is not only a great way to dispose of unwanted food, but it also produces a valuable soil additive that can enhance plant growth and reduce the amount of waste sent to landfills.

I believe that implementing universal composting practices can make a significant impact on our city's waste reduction efforts and contribute to a cleaner and more sustainable environment. By diverting food scraps from landfills, we can reduce the amount of waste that ends up in our streets that attract unwanted pests like rats.

I am a solution-oriented, adaptable, and creative individual who is passionate about finding practical and sustainable solutions to environmental challenges. I believe that composting can play a crucial role in achieving our common human ideals of beauty and cleanliness in our city. By making composting a norm, we can create a cleaner and more sustainable environment for all New Yorkers.

I would be honored to have the opportunity to contribute to the New York City Council's efforts in promoting composting and reducing waste. Thank you for considering my support and for your dedication to improving our city's environmental sustainability.

Sincerely,
Saba Hamidi Coleman

Dear City Council Members,

I am writing today as I am extremely disappointed to learn that the city is planning to defund community composting as part of the Program to Eliminate the Gap (PEG) cuts to the Department of Sanitation. Compost in NYC is as much about building healthy communities as it is building soil structure, and the work of the NYC Compost Project and GrowNYC is essential to our city.

I was recently informed that the compost program where I have been dropping my family's compost off weekly for years will be ending on December 17th, 2023. This is unacceptable to me as a homeowner and taxpayer.

I cannot stress enough the urgency of reinstating the funding for the NYC Compost Project and GrowNYC's compost programming, and enabling them to continue their vital work of education, diverting food scraps from landfills, and making the city a healthier, cleaner, and more resilient place to live and work. If these programs are removed from the budget, the city's Zero Waste goals are imperiled, and the jobs of 115 workers from 9 non-profit organizations will be lost. Cutting these jobs, 53 of which are union, is unacceptable.

This program is not expensive; coming in at only 0.3% of the Sanitation budget, it is a drop in the bucket, and yet it has proven to be effective as well as immensely popular.

We cannot allow this colossal environmental setback on our watch; New Yorkers deserve better.

Please reverse these cuts to community composting programs and vote NO to the Mayor's cuts to this essential program in order to save union jobs and make our city more sustainable. The Council must also fight for this program going forward by ensuring sufficient funding in the 2024 budget this spring. The Council should also mandate that this program exist through legislation, which would make it permanent.

Thank you,
Samantha Horowitz
Brooklyn, NY

SUPPORT COMPOST

it is hypocritical of the New York City government to pretend it supports environmental services and compost, funding department of sanitation to support the borrows in collecting food waste, and therefore contributing to climate mitigation, and then behind closed doors, decide to slash budgets and defund several pillar organizations that have organized and contributed to tons, and tons of food waste reduction . Continue to fund, compost, allocate budget funding and donâ€™t be fake to New Yorkers.

The main reasons to save community composting are obvious—it's a way to keep waste out of the landfill, create healthier soil, and tackle the fatal climate crisis we all are facing. I'll keep my testimony to my personal experience: when I started composting, I was shocked to realize how much of my waste is food waste. As a three person apartment, my household fills up at least 10 gallon bags per week. I think food waste accounts for at least half of what we throw out. Donating it directly to community compost programs means that instead of rotting in the landfill and releasing detrimental gasses, that waste is turned into something beneficial. If you cut this program, to be honest, you're a villain. Why not take the money out of the NYPD's \$5.83 billion budget?

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 12/12/23

(PLEASE PRINT)

Name: Kristen St Louis

Address: [redacted] Circle Loop St, NY

I represent: New York Lawyers for Public Interest

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 12/12/2023

(PLEASE PRINT)

Name: Daniel Chu

Address: [redacted] St, Brooklyn NY

I represent: new york city environmental justice alliance

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 12/12/23

(PLEASE PRINT)

Name: ALFA SOOMRO

Address: _____

I represent: NY League of Conservation Voters

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 12/12/23

(PLEASE PRINT)

Name: Jane Hajwani

Address: DEP

I represent: Army Chief Decarbonization Officer

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Keith Herman

Address: Deputy Commissioner, Fleet

I represent: DCAS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Sana Barakat

Address: Deputy Commissioner, Energy Management

I represent: DCAS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Beatrice Thuo

Address: Executive Deputy Commissioner

I represent: DCAS

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 12/12/23

(PLEASE PRINT)

Name: HARRISON NESBIT

Address: Starling Place, Brooklyn, NY 11235

I represent: NIC H2O

Address: N/A

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 12/12/23

(PLEASE PRINT)

Name: JOE CHAVEZ

Address: 253 BROADWAY 14TH FLOOR, NY NY

I represent: MAYOR'S OFFICE OF CLIMATE & ENVIRONMENTAL JUSTICE

Address: 253 BROADWAY 14TH FLOOR, NY NY

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Anna Pavlova

Address: _____

I represent: CarbonQuest

Address: 1425 7th St NY NY 10019

Please complete this card and return to the Sergeant-at-Arms