



**Public Comment Guide on New York State's Draft Climate Plan**  
**Building Waste Diversion and Reuse**  
**for a More Sustainable Built Environment**

This guide highlights key points and recommendations to make in public comments on the NYS Climate Action Council's Draft Scoping Plan pertaining to **building waste, also known as construction and demolition debris (CDD)**. **CDD is the country's largest waste stream.**

The Scoping Plan is NYS's plan to implement the Climate Leadership and Community Protection Act (Climate Act). The final plan will shape state laws, regulations, funding and government-wide decision-making for years to come. The Draft Scoping Plan is open for public comment **through July 1, 2022**. Your input can help ensure that our state has an effective and realistic plan in place to meet its climate goals.

The Climate Act commits New York to achieve a carbon-neutral economy by 2050. This includes:

- By 2030: Generate **70%** of electricity from renewable resources and reduce GHG emissions by **40%** below 1990 levels.
- By 2040: Achieve 100% zero-carbon electricity by 2040 with a **fossil fuel-free** grid.
- Ensure a **just and equitable** transition, including dedicating 35-40% of the benefits of clean energy investments to Disadvantaged Communities.

**The Impacts of Building and Infrastructure Demolition**

CDD is the largest waste stream in the US – twice the amount of municipal solid waste (MSW), our daily household garbage.<sup>1</sup> More than 90 percent of CDD results from demolition, little of which is reused or recycled. As a result, CDD is the largest single component of US landfills.<sup>2</sup> Yet upward of 80 percent of building materials can be reused.<sup>3</sup>

Diverting this waste stream from landfills and reusing building materials can result in significant environmental, economic and social benefit. Reuse of building materials:

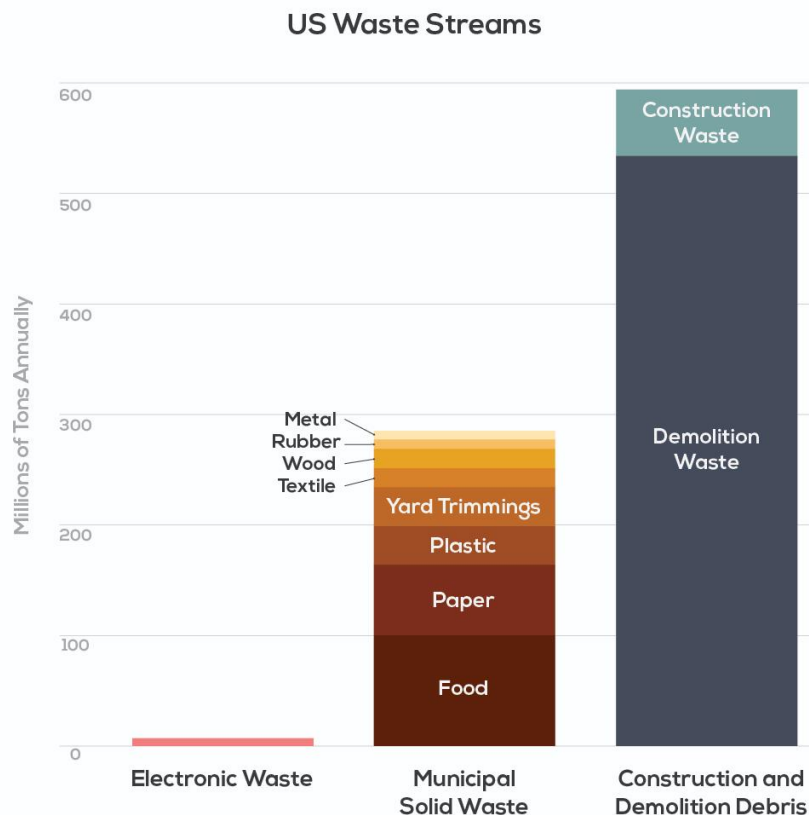
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<sup>1</sup> *Advancing Sustainable Materials Management 2018 Fact Sheet*, EPA, December 2020

<sup>2</sup> *Advancing Sustainable Materials Management 2018 Fact Sheet*, EPA, December 2020

<sup>3</sup> *Treasure in the Walls*, Place Economics, February 2021

- Retains the embodied carbon associated with the extraction, transportation, manufacturing of the original raw materials, and reduces the need for further resource extraction
- Reduces air, land, water pollution at demolition sites and in areas with landfills
- Creates green jobs
- Recaptures the value of materials to stimulate the local economy
- Preserves history and culture through reclaiming the materials and honoring their craftsmanship and stories



New York State cannot achieve our ambitious climate goals without prioritizing our built environment and encouraging the rehabilitation and adaptive reuse of buildings, as well as the deconstruction and salvage of building materials for reuse through policy, regulations, incentives and research. Share your views in writing and/or at a public hearing – details below.

### **Key Points to Include in Public Comments**

CROWD believes the Draft Scoping Plan can go further in suggesting policies, support and actions that can be taken to rehabilitate and adaptively reuse buildings, divert building and infrastructure materials from reaching the landfill by encouraging their reuse and recycling, create green jobs and ensure equitable outcomes for disadvantaged communities.

**1) Set a target of 2026 to divert 50% of building waste from landfills, increasing to 80% by 2030.**

- **Require a per ton surcharge on all waste** to fund reduction, reuse and recycling programs, while also expanding policies and programs to encourage individual and large-scale reuse of building materials.
- Expand **local financial assistance for reuse of building materials** and encourage plans that support market development for these materials, including incentives and funding for pilot programs.
- **Develop public informational resources** working in collaboration with relevant stakeholders (state agencies, local governments, contractors, property owners).
- Support local governments to **adopt requirements that all sites slated for full removal must be deconstructed rather than demolished by 2026.**

**2) Prioritize reuse and recycling of building and infrastructure materials.**

- Adopt **codes for new construction that enable the incorporation of reused materials.**
- **Support workforce training of green jobs**, with deconstruction as an important component.
- Develop and enact **state procurement standards for reused building material.**
- Enact a **production tax credit to encourage companies turning recyclable materials into intermediate products** to locate facilities in New York.
- Provide financial support to municipalities/counties for **the development of local reuse centers and material exchanges.**

**3) Develop plans to divert concrete and asphalt, CCD's two largest components, from waste streams.**

- Require local governments, in conjunction with the Department of Transportation (DOT), to **use a paving base of 100 percent recycled asphalt and concrete, and to encourage on-site street recycling that includes recycled aggregate.**
- Establish an environmentally sound plan for **waste resulting from the demolition of New York's interstate highways.**
- Support research, facilities, and programs that focus on the **reuse and recycling of concrete, asphalt shingles, gypsum (drywall) and masonry.**

**Please share your views in writing and/or at a public hearing**

The deadline for public comments is **July 1, 2022. Make your voice heard!** Below is information regarding public comments in writing and in person. Together, we can support and strengthen the recommendations of the Draft Scoping Plan on CDD so that we achieve the goals of the Climate Act while ensuring a more equitable, sustainable built environment.

- 1) In writing. Submit your written comments through the portal on the Climate Action Council website, <https://nyscrda.seamlessdocs.com/f/DraftScopingComments>, or email them to [scopingplan@nyscrda.ny.gov](mailto:scopingplan@nyscrda.ny.gov). A number of Scoping Plan recommendations will require legislation; please share your comments with your State legislators: <https://nyassembly.gov/mem/search/>  
<https://www.nysenate.gov/find-my-senator>

When submitting your online comment, choose “Buildings” (Chapter 12) and/or “Waste” (Chapter 16) category. Your written comment online is limited to 2,000 characters; you can cut and paste Key Points 1-3 in their entirety. You may also write a letter to upload as an attachment.

- 2) At a public hearing. You can attend and speak at one of the scheduled public hearings. You must register to speak (two-minute limit). Registration and further information is available at <https://climate.ny.gov/CAC-Meetings-and-Materials>

**In-person Hearings (4-7 pm)**

April 27 Buffalo

May 3 Brooklyn

May 10 Tupper Lake

**Virtual Hearings**

May 7, 10am

May 11, 4pm

The Scoping Plan must be finalized by the Climate Action Council and delivered to the Governor and Legislature by December 31, 2022. Let's make sure this Plan delivers on New York's climate goals while recognizing the opportunities of effective building material reuse.

*CROWD (Circularity, Reuse, Zero Waste Development) is a collaborative network that supports New York State communities in their plans to achieve sustainable, equitable and resilient built environments. CROWD promotes deconstruction, salvage and reuse of building materials and architectural elements through data-driven policy recommendations, engagement and education. CROWD's includes architects, planners, preservationists, municipal staff and professionals working in reuse and salvage, waste and recycling.*

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