



March 26, 2024

Basil Seggos, Commissioner  
New York State Department of Environmental Conservation  
625 Broadway, 14<sup>th</sup> Fl  
Albany, NY 12233

Dear Commissioner Seggos,

On behalf of *CET*, this letter serves to express support for the New York State Department of Environmental Conservation's (NYSDEC) application to the U.S. EPA Climate Pollution Reduction Grants (CPRG) program, titled "Building Community Resilience through Greenhouse Gas Emission Reductions." With this proposal, NYSDEC, in partnership with the New York State Energy Research and Development Authority (NYSERDA), will implement programs that reduce greenhouse gas emissions from facilities and services that serve key resiliency purposes for New York's communities. The programs included in this proposal will not only address greenhouse gas emissions in the near- and long-term but will also provide substantial co-benefits such as air quality improvements and health benefits, with a particular focus on public services and disadvantaged communities.

CET is an environmental nonprofit that helps people and businesses save energy and reduce waste. We act as a catalyst to accelerate the development of a vibrant marketplace to divert waste, particularly wasted food. We work with three key stakeholder groups to build thriving waste diversion marketplaces: the policymakers who design laws or regulations and fund programs, and infrastructure; the businesses and institutions that generate waste; and the service providers who prevent waste, accept donations or haul it away and recycle or compost it. We help all of them design and sustain solutions for wasted food, and many other materials. We are currently working directly with NYS DEC to administer the ReThink Food Waste NY program, to support designated food scrap generators and other food businesses better manage wasted food throughout New York.

Each component of this application has the potential to transform New York's communities and create lasting reductions in greenhouse gas emissions and other pollutants. These proposed programs, when implemented together, will ensure that investments in emissions reductions also support more resilient public services and buildings.

DEC's proposed investment in organic waste management solutions can help avoid waste going to landfill, and potentially result in value-added projects that can be used to build community resilience like green infrastructure and community gardens. Focusing on diverting organic waste can also improve food donation rates, providing emergency access to households in need, while potentially saving on operational costs for food businesses. According to Drawdown, preventing wasted food is the top readily available climate solution and CET supports all efforts across the EPA food recovery scale to address the issue.

Further, our deep knowledge and experience in building decarbonization compels us to support the plan to help municipalities in updating their buildings to cost-effectively reduce emissions will allow



resource-constrained local governments, particularly those that serve disadvantaged communities that may have more constrained tax bases, to save on operational costs and reap the co-benefits of deep energy retrofits, such as improved thermal comfort. In addition, this proposal will allow municipalities to better serve their constituents by having more state-of-the-art buildings and the provision of community spaces with efficient heating and cooling that can be deployed in periods of extreme heat or extreme cold. These interventions may save lives and improve health of heat-sensitive and other medically vulnerable individuals, while also reducing air pollution and carbon emissions.

We strongly endorse this application and look forward to seeing these programs implemented in New York State.

Sincerely,

Lorenzo Macaluso  
Chief Growth Officer