



96 Sterling Street, #1, Brooklyn NY 11225
clare@centerforzerowastedesign.org 718.306.9525

July 21st, 2023

Chair Dan Garodnick
City Planning Commission
120 Broadway
New York, NY 10271

Re: City of Yes for Carbon Neutrality

Chair Garodnick,

On behalf of the Center for Zero Waste design, I am writing to share our support of Mayor Adams' proposed City of Yes for Carbon Neutrality (CoYCN) text amendment.

We are well aware of the existential threat that extreme weather and sea level rise creates for the City. We applaud all the progress the City has made in reducing energy consumption in buildings and supporting renewable energy generation, and welcome these zoning amendments to support that work further.

On zero waste though, NYC has made less progress. Food scraps are of particular issue to climate change. Organic waste is the most problematic part of the waste stream – creating methane if sent to landfill, and causing odors and rats on city sidewalks. Yet, it also has the potential to greatly increase the city's resilience. If organic waste is composted locally, the resulting compost can be used to make soils healthier, increasing the infiltration of stormwater and reducing flooding. Healthy soil also supports healthier trees that can transpire more water, helping keep the air cool. Yet, composting is not listed as a use in the current zoning text.

We strongly support the zoning amendments which clarify where composting can occur, including allowing

- Composting as an accessory use;
- Small neighborhood scale indoor compost or recycling facilities in C and M zoning districts
- Composting facilities in M1, M2, and M3 districts.

These amendments carefully consider the size and zone where composting should be allowed, and will help support the upcoming mandatory organic waste separation rules. We believe they will help motivate small scale composting facilities throughout the city, reducing the trucks needed to collect organic waste, and providing compost for use to improve the soils in local parks, street trees and community gardens. Community composting also plays a crucial role in educating communities in waste reduction and regeneration of natural systems. It can help create hope, social resilience, and civic engagement. We have looked at the importance of small scale composting distributed throughout the city in our Put Waste to Work vision plan, see our post on how to [regenerate city soils with compost made from food scraps](#).

We applaud DCP's leadership and staff for developing these proposals and hope that the text is approved soon,

A handwritten signature in black ink that reads "Clare Miflin". The signature is fluid and cursive.

Clare Miflin
Executive Director, Center for Zero Waste Design