

May 27, 2022

Memorandum: Barnard College comments on the CLCPA Draft Scoping Plan

As a college for women, Barnard College’s mission is to address issues of gender in all of their complexity and urgency and to help students achieve the personal strength that will enable them to meet the challenges they will encounter throughout their lives. Committed to diversity in its student body, faculty, and staff, Barnard prepares its graduates to flourish in an increasingly interconnected world. Barnard is located in New York City, and affiliated with Columbia University, with an undergraduate population of approximately 3,000 students, and 16 buildings on just over 4 acres. Barnard is committed to sustainability and climate action, and prioritizes strategies that center the leadership of women and disadvantaged communities.

Barnard is pleased to offer comments on the CLCPA draft scoping plan. The plan is impressive in its scope and thoroughness; the College especially applauds the focus on climate justice and impacted communities. This plan is a welcome continuation of the strong climate policies that New York has introduced in recent years; Barnard welcomes the opportunity to contribute to continued New York leadership on climate action and environmental justice.

We have identified several opportunities to expand and strengthen the draft scoping plan, with special emphasis on the power of circular strategies to significantly reduce emissions and waste, while creating good local jobs and building community resilience. Circularity is a powerful – and necessary – strategy that is not yet adequately represented in the draft plan.

Ch. 4: “On current emissions,” Barnard recommends that Scope 3 emissions be counted and reported more consistently. The latest IPCC report indicates that ““a city cannot achieve net zero GHG emissions by only focusing on reducing emissions within its administrative boundaries,” and the C40 cities report warns that we need to reduce indirect emissions from consumption in cities—by as much as 50% by 2030—to have any hope of staying below 1.5°C. The CLCPA plan should more accurately reflect the significant impact of consumption on emissions outside of traditional GHG accounting boundaries, and demand more complete accounting of emissions across all three scopes.

Ch. 5: “Key Strategies,” Given the need to address consumption and indirect emissions, Barnard recommends that circularity measures be included as a key strategy for New York State. The benefits are both global and local. Globally, circularity is a powerful tool for reducing greenhouse gas emissions from Scope 3 associated behaviors: the World Resources Institute calculates that “by doubling global circularity in the next 10 years, global greenhouse gas emissions could be reduced by 39% and shrink the total material footprint by 28% by 2032.”

Locally, circularity reduces waste, creates local jobs, and supports community resilience. It's important to note that waste incineration should not be included as part of New York State strategies. Existing incinerators should be shut down, and no new incinerators should be added.

Ch. 6: "Climate Justice and Disadvantaged Communities," The CLCPA should include specific strategies to support circular strategies in businesses and communities, such as supporting reuse and repair through tax rebates for local businesses and workforce development programs. Circular practices increase access to high quality goods, build community resilience, benefit local businesses, and reduce dependence on the waste-sorting facilities and waste-truck traffic disproportionately cited in the poorest neighborhoods. Sharing and reuse connect neighbors, create local jobs, reinforce relationships, and foster a sense of inclusion, abundance, and mutual support. Given these benefits to disadvantaged communities, Table 1 on page 37 could include even more specific strategies to support reuse and repair, mandatory composting, more stringent recycling programs, and pay-as-you-throw waste collection for landfill.

Ch. 14: "Industry," Low-carbon procurement and low-carbon manufacturing are excellent and important goals. In addition, strategies to reduce the amount of raw materials used in construction and procurement should be explicitly included: even low-carbon materials are more climate-intensive than reuse.

Ch. 12 and 13: "Buildings," and "Electricity," Finally, Barnard applauds the calls for increased incentives and financial support for building retrofits and renewable energy infrastructure throughout. It cannot be emphasized enough that the costs of transforming our campus – and our city – are significant. Without state funding, the College, like many institutions, risks missing critical 2030 Scope 1 emissions reduction goals. Finally, Barnard's pathway to Net Zero depends on electrifying our campus. But without access to renewable energy, our infrastructure changes will not reduce emissions.

Thank you for the opportunity to comment on this draft scoping plan, and for all of the hard work that went into crafting this ambitious document. We would be happy to meet with you to discuss these comments, the scoping plan more broadly, or any ways we can support this process. Barnard welcomes this chance to contribute to a shared vision for a just and sustainable New York.



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