



COMMUNITY • ECONOMY • ENVIRONMENT

Thank you for the opportunity to comment on the draft scoping plan. Incorporated 15 years ago, [Finger Lakes ReUse](#) (FLR) is an environmental NGO with the mission: *to enhance community, economy, and environment through reuse*. Our *Articles of Incorporation*¹ authorized by NYS in October 2007 include the following purpose: To provide consultation services on reuse to communities, non-profit organizations, businesses, and other entities requesting assistance.

Reuse is distinctly different and far more environmentally preferable to recycling, is much more than a thrift store, and more than keeping items out of landfills and incinerators. Reuse not only reduces unnecessary waste, reuse also creates local economic and professional development opportunity, while helping avoid global extraction, production, and transport - all energy-intensive, mainly fossil fuel-driven processes with often unfair labor practices taking advantage of vulnerable populations in developing countries.

FLR enhances the community by creating a growing number of living wage job opportunities for people who have experienced barriers to employment, we enhance the economy by diverting waste that Tompkins County residents, businesses and institutions pay to throw away, but instead we redirect these materials through our Community ReUse Centers and sell them at \$2,000-\$3,000 per ton vs a cost of \$96 per ton to dispose. And there is no question reuse enhances the environment, not just by reducing what goes to landfills and incinerators, but by avoiding the activity in making the item in the first place, with even greater harm, at the other end of the pipe.

¹ The Corporation is formed to conduct activities which are exclusively charitable and educational within the meaning of Section 501(c)(3) of the Internal Revenue Code as it may be amended from time to time (the "Code"). Its public and quasi-public purposes are the following: a. To reduce waste by providing and promoting alternatives for reusable materials; partnering with local solid waste programs and existing reuse programs to realize efficiencies and expand services; actively procuring materials through deconstruction and pick-up/delivery services; and working with businesses and institutions to meet their reuse needs. b. To partner with existing social service and educational programs to provide training in reuse industries. However, nothing herein shall authorize the Corporation to operate or maintain a charter school, a nursery school, an elementary school, or a secondary school. c. To educate the public about the value of reusable materials and teach people how to transform materials for practical and creative applications. d. To operate one or more centers that offer quality used materials to the public. e. To provide a deconstruction service that safely deconstructs buildings in an environmentally responsible manner. f. To provide value-added services through appliance and electronics repair, computer upgrades, and other activities, increasing the value of reusable materials. g. To provide consultation services on reuse to communities, non-profit organizations, businesses, and other entities requesting assistance.

Reuse is gaining attention and momentum in NYS. Finger Lakes ReUse, Syracuse University's [Center for Sustainable Community Solutions](#), [CR0WD](#) (Circularity, Reuse and Zero Waste Development) and SUNY-ESF's [Center for Sustainable Materials Management](#) collaborated to host the first statewide Reuse Summit in NY on June 16, 2022: more than 160 people attended from 7 states, 32 NY counties, and 64 NY communities. In the last several years, Finger Lakes ReUse has been recognized through more than 150 successful grant applications, and a number of awards for outstanding performance from the NYS Assn of Reduce, Reuse, and Recycle (NYSAR3), the Town of Ithaca, NYSDEC, US EPA, the Tompkins County Chamber of Commerce, and others.

Public perception about reuse and second-hand goods has been steadily shifting in recent years. The public engagement Finger Lakes ReUse has successfully harnessed is demonstrated in the record donations received year after year, and 27% sales growth over the last 5 years, in spite of the pandemic. In fact, Ithaca just voted Finger Lakes ReUse its best *department* store – not thrift store.

We recommend focus and investment in community-level reuse throughout the state. Reuse is by nature an activity that is most impactful on the local scale, although a collaborative regional (and beyond) network to manage and effectively redistribute large scale volumes and commodities is recommended to truly have maximum impact. At an estimated \$52 in sales of used materials per capita (based on current performance of Finger Lakes ReUse outlets alone in Tompkins County) - this would generate more than \$1 billion in sales. The right-sized reuse infrastructure would create more than 30,000 jobs, help divert over 500,000 tons of reusable and repairable materials annually, with a cost savings in waste expenses of more than \$48 million dollars and enormous benefits toward efforts to combat the climate crisis.

Comments on the Waste Sector
Chapter 16, pp. 233-252

Although it is encouraging to see the term “reuse” sprinkled throughout the waste chapter, there are significant gaps in accounting for reuse as a powerful and popular materials management strategy. If given adequate support and resources in NY, reuse will not only reduce the volume of material going to landfills and incinerators, it will create many thousands of quality, living wage jobs and job training opportunities, and provide much needed economic relief for the local residents who need it the most. As Finger Lakes ReUse has proved, the activity of shopping for and donating reusable goods attracts and engages more than 4,000 people per week and can be an excellent

outreach point for important material management messaging, especially for people who may be difficult to reach.

Overall comment:

Reuse as a materials management strategy is often left out and needs to be prioritized and integrated into all CLCPA strategies and adequately resourced.

Section 16.1 overview, p. 233

There is no mention of how reuse manages MSW generated in NY, nor is there a percentage for reuse calculated in Fig. 26. We would like to help set those goals for NYS.

Section 16.1, p. 236

Add “reuse” and “repair” to “Waste prevention and recycling”. “Waste prevention, reuse, repair and recycling.”

Section 16.1, p. 237

Although the Solid Waste Management Act established reusing material as its second priority, NYS has not acted on supporting a strong reuse sector. The reuse sector that is incentivized can consist of NGOs, social enterprises and private enterprises such as B corporations. Finger Lakes ReUse would like to lend its experience to determining what that support could look like.

Section 16.1, p. 238

Recycling and reuse account for 725 million pounds but the total needs to be separated and totaled into each individual material management method. Also, while weight and volume are the traditional measurements for materials management, economic value of materials could be considered a measurement as well. For example, while it costs \$96/per ton to dispose of waste in Tompkins County, Finger Lakes ReUse demonstrates earned revenue from reusable material exceeding \$2,000 per ton - locally generated revenue without need for trucking material long distances.

Section W1, p. 241

The proposed state legislation should state clearly the amount of financial support for reuse that would come from the waste surcharge. FLR staff could help share its data to help define this level of startup support.

Section W2, p. 242

Financial assistance should be expanded for reuse organizations specifically and considering the value and jobs FLR is demonstrating reuse can return to local

communities, the Climate Justice Working Group should be supporting reuse as well as recycling.

Section W2, p. 243

Support for local facilities: asking for support for local reuse centers is too vague. Instead, add seed funding for every county to plan an independently operated Community ReUse Center network and to expand existing reuse operations. In FLR's first 5 years, contracts totaling \$507k from Tompkins County leveraged an additional \$505k in grants and donations from other sources, and \$1,006,000 in earned revenues through merchandise sales. Over the next 9 years (through 2021), FLR exceeded \$9.5M in merchandise sales, exceeding \$2M in 2021 alone, and an expectation to exceed \$2.4M in sales in 2022, supporting 83 employees (58.75 FTE) paid a living wage with health benefits.

Section W2, p. 243

Workforce development: This is too vague. As FLR demonstrates in Tompkins County with a developed collaborative network, Community ReUse Centers can provide important bridge programs for workforce engagement and workforce development efforts toward a green economy. FLR has demonstrated success with engaging people who have experienced barriers to employment and finding long-term employment or successful transitional experiences.

Section W8, p. 249

Recycling Markets - need to add Reuse Markets for deconstructed materials as well as for supporting repair. Large warehouse space is required for building materials, and activities such as appliance repair, and bulk handling (baling, staging, and loading) of textiles, cardboard etc. There is a demonstrated demand for affordable building materials and appliances, a strong secondary market for textiles and fiber, and a strong public interest in deconstruction as an environmentally sensitive alternative to demolition. FLR is working on a "Hub & Exchange" system. Hubs are large warehouses with high ceilings and multiple loading docks where bulk materials can be absorbed, processed, refurbished and redistributed to appropriate markets, and larger scale building materials can be effectively sorted and displayed for purchase. Exchanges are convenient and visible retail outlets that double as donation drop off points. A minimum of one hub and multiple exchanges per County is a recommended starting scale. By investing in larger-scale Hubs in each County, this will give a meaningful starting point to effectively provide the necessary infrastructure to absorb, process and stage building materials from deconstruction and surplus from construction projects. There are numerous nonprofit and for-profit models nationally that thrive with the sale of building materials.

Section W8, p. 250

Reuse of building materials: Commit specific amount of financial assistance for capture and reuse of building deconstruction materials. At Cornell University, Felix Heisel, Director of the [Circular Construction Lab](#) has worked with FLR and CR0WD to demonstrate the impacts of deconstruction, as opposed to traditional demolition. This project is ongoing, and there will be deliverable data by the end of 2022.

Comments on Just Transitions

Chapter 7, pp. 41-52

Community ReUse Centers can act as important “bridge programs” in the much needed workforce development for workers to explore new skills and career paths, and to help move from the fossil fuel industry to a greener energy infrastructure. FLR is already demonstrating success in engaging and working with people who have experienced barriers to employment and may be hard to employ. The variety of blue, green and white collar skill sets available in the array of reuse activities provide an excellent platform for nearly any career aspiration. FLR has demonstrated successful programmatic partnerships with workforce development agencies, unions, and trade schools.

Overall comment:

Focus tends to be on displaced workers in the energy sector. Programs like [FLR's ReSET \(ReUse Skills & Employment Training\)](#) and its work with the [Roots of Success](#) curriculum for Disadvantaged Workers in the green economy should be supported and strengthened.

Comments on the Industry Sector

Chapter 14, pp. 180-192

Reuse is not mentioned in this chapter, but reuse is an emerging industry that can be primarily self-supporting once the networks are sufficiently developed. As an action that converts liabilities (waste) into assets (locally available merchandise and business feedstocks), Reuse should be included and supported as an emissions-free strategy that reduces dependency on manufacturing, mining and quarrying raw materials. Used and reusable materials, particularly in the volumes that could be generated through wide-scale building deconstruction, should be similarly looked to as the widely available natural resources that they are. Finger Lakes ReUse is already demonstrating

significant growth (averaging 27% per year for the last 5 years) in Tompkins County alone, and continues to be overwhelmed by materials that are in high demand.

Looking to reuse as an opportunity to transform local liabilities (waste) into local assets (revenue-generating commodities and merchandise) is a sensible solution and low-hanging fruit for every New York State community. Finger Lakes ReUse is demonstrating clearly that the existing network of traditional thrift, online sales, and garage sales are not nearly sufficient, and there are quality jobs, workforce development and workforce engagement opportunities that can be supported in the process.

The investment necessary for the emerging reuse industry to thrive consists of underutilized infrastructure that is available in nearly every community: empty warehouses and retail outlets, box trucks, and workers. Finger Lakes ReUse has designed an Online Business Plan Template and co-hosted a recent successful NY Reuse Summit that demonstrated interest from 50% of NYS Counties. FLR is willing to provide technical assistance to help these communities, and is in the process of considering what type of capacity and programming will best support this effort.

A recommendation of selecting 5 communities to start with an investment in seed money and supporting technical assistance will help accelerate this essential industry growth and result in hundreds of jobs in the first 5 years, and thousands within 10 years. Considering that Finger Lakes ReUse currently employs more than 80 people in a County of approximately 100,000 residents, and considering the returns (more than \$2 million in sales in 2021 and on track to earn \$2.4 million in sales in 2022) this is an emerging industry that merits a strong look, and focused investment.

Section I2, pp. 185-6

“The public sector purchases a large proportion of building materials produced in the market,” which means the State can focus on or incentivize purchasing/procuring deconstructed building materials whenever possible.

Section I2, p. 186

“About 28% of annual emissions associated with buildings can be allocated to the use of construction materials”--there must be substantial State support for deconstruction, and CROWD is working with Cornell University’s Circular Construction Lab to help develop policy and incentives to support this important transition.

Section I3, p. 188

“Workforce Development: Expand training capacity: NYSERDA should partner with training organizations and businesses to increase the number of individuals being provided with training, with particular attention to increasing the number of individuals from Disadvantaged Communities being served by these programs.” Helping support deconstruction and other reuse-related training programs that serve individuals from Disadvantaged Communities should be supported to help those reset their career paths and goals, as FLR is demonstrating successfully.

***Comments on the Buildings Sector
Chapter 12, pp. 119-148***

Over their whole lifecycle, buildings now account for >50% of resource consumption, >50% of waste production, and most probably >40% of carbon emissions globally. Yet reuse and building deconstruction is mentioned very briefly as a strategy.

Section B5, p. 138

Create a revolving loan fund for the reuse of buildings and building materials. This can help contractors expand their services to provide deconstruction by obtaining specialized equipment and tools, and can help developers choose adaptive reuse over demolition and new construction. For example, the Environmental Facilities Corporation’s (EFC) Clean Water State Revolving Fund provides a model for enabling public mandates to be coupled with access to low-cost capital. This could be implemented through a bond-issuing government authority.

Section B10, p. 145

The State should support building reuse, building deconstruction and material reuse—this language is not specific enough. Specific actions such as incentivizing policy change and providing technical assistance for local building departments, and providing capital assistance for sufficient infrastructure such as FLR’s Community ReUse Center Hub & Exchange system outlined in the Waste Chapter comments could be included here.

Section B10, p. 146

Encourage building reuse: Identify and pursue financial incentives for preservation associations to provide technical assistance to developers, invest in technologies that support converting rather than replacing HVAC units and other building systems that are transitioning to electric sources, support changes to building codes, and other strategies to encourage building reuse, beginning in urban centers that are returning vacant

buildings to use. Maintaining the existing building facade and architectural style can be an additional benefit to the embodied carbon reduction.

Support RD&D: Support RD&D, demonstration projects, and technology transfer and commercialization for enhanced low embodied carbon construction, including preference for preservation and adaptive-reuse of existing buildings and deconstruction over demolition when full or partial building rehabilitation is required. Showcase low embodied carbon designs and undertake industry outreach.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Cohen', with a long, sweeping horizontal flourish extending to the right.

Diane Cohen, Executive Director,
Finger Lakes ReUse, Inc.