

Attention: Draft Scoping Plan Comments

NYSERDA, 17 Columbia Circle

Albany NY 12203-6399

A. GENERAL COMMENTS

1. ENVIRONMENTAL JUSTICE concerns specified are outstanding. This is the most attentive and thorough effort to address needs of underserved citizens and communities that I have observed in 52 years of involvement in environmental activism, policy and planning via non-profits and state agencies (Adirondack Park Agency, NYSERDA). KEEP IT UP! Am sure even more should be addressed.
2. THE DRAFT PLAN IS WRITTEN FROM THE PERSPECTIVE OF STATE AGENCIES. The Final Plan could/should address climate goals and issues from the perspective of under-served communities, non-profits, localities and the private sector as indispensable partners. They are critical to achieving the ambitious goals outlined, and encompass many more citizens, organizations, entities, and local governments than the state government/legislative sector.
3. DRAFT PLAN RECOMMENDATIONS ARE MOSTLY "SHOULD", NOT "WILLS". Therefore, the parallel roles of the Governor's office, the state legislature and city/county/town legislative bodies are critically important to further the recommended goals.
4. A CIVILIAN CLIMATE CORPS or equivalent, identified by many activists in the U.S. and N.Y.S, would be a comprehensive response to implementing recommendations in the timely fashion urgently needed.
5. DRAFT PLAN HAS MANY REDUNDANCIES UNDER ADVISORY PANEL/SECTOR CHAPTERS. For clarity, the Final Plan might consolidate these under encompassing headings, e.g., "Scientific Knowledge"; "Outreach/Education Primacy"; "Roles of Government, Non-profits/Community Groups, Industry/Utilities"; "Health and Environmental benefits"; "Economic Benefits".

B. SPECIFIC COMMENTS

1. NUCLEAR ENERGY: According to the Draft Plan, nuclear energy represents 29% of the current state source for electricity generation. Yet the Draft of 330 pp. makes only 2 brief references to nuclear energy on pp. 177 and 179. Nuclear energy has in the past and present been the focus of more public controversy than any other source, including fossil fuels. Lawsuits are likely, which will clearly affect the Plan timetable over decades. IT IS VITAL TO ADDRESS **NOW** the continuing role of nuclear energy as a non-carbonized source of electricity, given the significant amount it represents as an energy source.

Whether abandoned or retained, it is unrealistic to assume that the Plan goals can be met in the needed timetable without some level of nuclear energy as a source for electricity generation. The Final Plan desperately needs a fuller evaluation of nuclear energy and how it may affect the goals of the Plan. There is likely a need for additional expertise on this issue. The potential for nuclear energy to be available in a form that greatly minimizes the adverse impacts of safety and waste, or until renewables are sufficiently in place, needs to be addressed seriously, given what a large place it holds as a present source of electricity.

2. AMOUNT OF CURRENT RENEWABLE SOURCES OPTIMIZES MISLEADING NUMBERS: **Renewable sources of electric energy in NYS are given as 28%. That number includes 6-7 % from solar, wind, bio etc. and 22% from hydro, primarily from the Great Lakes/St. Lawrence system.** It is doubtful that any more significant energy can be derived from hydro (barring some unknown technology) without significant environmental impacts. Therefore, the amount of renewables actually needed to surpass the present 43% fossil fuel source is misleading, given that currently only 6-7 % of renewables come from non-hydro sources.

3. OMISSION OF NY STATE'S ADIRONDACK AND CATSKILL PARKS IN SECTIONS ON FORESTRY AND LAND USE IS NOTICEABLE AND INEXPLICABLE: These sparsely settled, heavily forested, largely carbon sinks cover over 20% of NYS land/water area; adding in the North Country about 25%. According to the Adirondack Watershed Institute, more than 2/3 of New Yorkers live and/or work in watersheds that originate in the Adirondack Park. Investment to insure these resources retain their effectiveness in combatting climate change is critically important. There is no voice for the Parks among Council members or the forestry/ag or land use/local government sectors, except director of the Tug Hill Commission, admirable, but only a very small part of the whole.

The only mention of the Adirondacks is part of two sentences referring to advisory roles of regional planning boards. These Parks, over six million acres, are owned by the People of the State of New York. DEC is responsible for management of the Parks. The Adirondack Park Agency is responsible for zoning, regulation of private land and some public land (wetlands), as well as planning for 20% of the state. Local governments also play a significant role in steering Adirondack/Catskill matters. The subgroups for forestry/ag and land use/local government should include representation of persons familiar with the Parks and their formidable resources of forests and wetlands, especially as a carbon sink.

4. *****THE SINGLE GREATEST NEED, WHEN THE FINAL PLAN IS SUBMITTED, WILL BE FOR A MASSIVE PUBLIC EDUCATION, SCIENTIFIC INFORMATION AND OUTREACH PROGRAM*****
The Draft Plan calls for education and outreach throughout its recommendations. These elements now need to LEAD THE RECOMMENDATIONS, NOT BE LISTED AT THE END of the document, as has been the case with most state-sponsored proposals.

A TASK FORCE SHOULD BE ASSEMBLED IN 2022 to devise and initiate a regional/locally sited, accessible process, putting education, scientific knowledge and outreach in the forefront to achieve buy-in and interaction from citizens, sectors and localities. Otherwise the critically important goals for 2030/2040 will never be achieved. FOR A VISION OR GOAL TO BE EFFECTIVE AND HAVE POWER AND MEANING IT MUST GET FROM THE PRODUCER TO THE MARKETPLACE!!

Thank you for the opportunity to comment.

Elizabeth 'Liz' Thorndike [REDACTED] [REDACTED]

(Thorndike served 36 years on the boards of the Adirondack Park Agency and NYSEDA. For 20 years she chaired the NYSEDA board committee with oversight of nuclear waste disposal at West Valley and related nuclear matters, and was the board's statutorily designated environmental representative.)