



Hudson River Sloop Clearwater Draft Scoping Plan Comments

To the Climate Action Council:

July 1, 2022

Hudson River Sloop Clearwater, Inc. would like to express our sincere appreciation for the work of the NYS Legislature in developing and passing the Climate Leadership and Community Protection Act and the state administrators who created the Climate Action Council's Draft Scoping Plan. As New York State proceeds with implementing this plan, we would emphasize the need to keep the protection of our water resources and watersheds a high focused priority throughout our conversion to a carbon neutral economy.

For New York to successfully implement the Draft Scoping Plan and establish a carbon neutral economy by 2040 the state must prioritize the funding and resources needed to make this happen at each stage of the Plan. Clearwater strongly supports aggressive funding of the Plan's initiatives so that the timeline can become a reality and the net benefit-cost findings as outlined in the Plan will be achieved.

Hudson River Sloop Clearwater has actively participated in the Mid-Hudson Regional Sustainability Coalition (MHRSC) since it was formed in 2010, working on the Water and Energy Working Groups and helping to draft the [Mid-Hudson Regional Sustainability Plan](#). Subsequently, the MHRSC submitted substantial comment on the Draft Scoping Plan, which had been reviewed by the entire 7-County Energy Working Group. As coordinator of that set of comments, Clearwater agrees with all that is contained therein and endorses their comments submitted to the Climate Action Council, which are attached.

Water is so central to human existence that it must be a key focus of any activity to stem climate change. The anticipated - and already demonstrated - effects of climate change on water bodies and related infrastructure are severe, important, and widespread. The Draft Scoping Plan must keep water quality and water system infrastructure a focused priority.

Clearwater's mission to defend and restore the Hudson River inspires our need to comment on how the Draft Scoping Plan needs to address the following issues.

The Plan should address adaptive reuse of Hudson River closed or closing shoreline facilities like the Indian Point Nuclear Power Plant and the Danskammer fossil fuel plant. The Climate Act requires the state to boost its 2030 battery storage goals to at least 4,200 MWh. While New York invests in renewable energy and should redirect all energy subsidies to support renewable energy, these plants could be converted to solar generation and energy storage facilities to support the new demands on the grid.

The Plan should recommend significant funding for Water Resource Recovery Facility Conversion as outlined on DSP 16.2, p. 244. Municipalities will need financial support to improve or replace

antiquated wastewater and stormwater treatment facilities to assure that their discharges do not degrade the hard-won water quality of New York's rivers and streams.

Funding also needs to be applied to monitoring and creating new wastewater infrastructure as noted in the section to Reduce Fugitive Emissions from Water Resource Recovery Facilities (DSP 16.2, p. 247.)

Freshwater wetland protection as outlined (LU4 Protect and Restore Wetlands, p. 283) also needs to stay a focused priority during implementation.

Conclusion: The intent of Clearwater's comments is to assure that while we move towards renewable energy, grid modification, carbon sequestration, energy conservation, and clean transportation, we do so with sufficient funding and a focus on the importance of protected watersheds, plans to address sea level rise and increased storms, support to riverfront communities, and equity to environmental justice communities as solutions are implemented. These priorities will be critical to achieving a successful transition to a carbon neutral economy by 2040.

Sincerely,



David Toman, Executive Director
david@clearwater.org



Stephen P. Stanne, Board President
president@clearwater.org