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Draft Scoping Plan Comments
NYSERDA
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Dear Sir/ Madame,

I write to you today in response to the call for public comments on New York State's Climate Action Council Draft Scoping Plan. As the public comment form online limited responses to only 2000 characters, I must write the old-fashioned way. Only 2000? Are you truly interested in what the citizens of New York have to say?

This Draft Scoping Plan is an insult to the citizens of New York State and a mandate to remove consumer and personal choices from them. The Plan must be defeated and the Climate Leadership and Community Protection Act (CLCPA) must be repealed. With its goal to "eliminate 100% of the climate pollution caused by humans" (https://eany.org/wp-content/uploads/2019/10/clcpa_fact_sheet_0.pdf) it is an unrealistic and expensive piece of legislation with absolutely no guarantees of success.

On pg.3 the Plan states that "Women, femmes, youth, and children in poverty commonly face higher risks and greater burdens from the impacts of climate change". "Femme" is defined as "a lesbian who exhibits a feminine identity". Are we to believe that lesbians who exhibit a male identity are less burdened by climate change? Where is the data? This statement, alone, suggests to me a fallacious CLCPA and its associated Draft Plan. But, I read on...

On pg.6, the Plan notes: "Many changes due to past and future GHG emissions are irreversible for centuries to millennia..." and "... there is high confidence that the sea level will continue to rise for centuries to millennia...". If true, it seems illogical to spend unknown amounts of money on something that we cannot change. In addition, do the creators of this Plan and the CLCPA really believe that they can affect the world's sea levels centuries ahead? If they are wrong, who will be held accountable?

On pg.7, the Plan states "New Yorkers will realize the extraordinary benefits of climate action... The investments made today will continue to drive value creation into the future...". Again, if I as a New Yorker do not, ultimately, realize any "extraordinary benefits" of this action, who will be responsible? And government action rarely creates value; rather it simply moves money around.

The NYISO graphic on pg.20 suggests that 53% of New York's energy will be from wind by 2040. That's only 18 years from now... are you serious?! And what is the disposal protocol for the blades? Looks like they are piling up, according to a recent article, and not easily recyclable:
<https://www.bloomberg.com/news/features/2020-02-05/wind-turbine-blades-can-t-be-recycled-so-they-re-piling-up-in-landfills>.

On pg.13, the Plan defines climate change as a "wicked problem". Some key characteristics of such a problem, according to the researchers (<https://www.stonybrook.edu/commcms/wicked-problem/about/What-is-a-wicked-problem>), are:

- They do not have a “stopping rule.” ... [they] lack an inherent logic that signals when they are solved.
- There is no way to test the solution to a wicked problem.
- They cannot be studied through trial and error. Their solutions are irreversible so... “every trial counts.”
- There is no end to the number of solutions or approaches to a wicked problem.
- Planners, that is those who present solutions to these problems, have no right to be wrong. [They] are liable for the consequences of the solutions they generate; the effects can matter a great deal to the people who are touched by those actions.

So according to the researchers quoted by the Plan, the CLCPA and Draft Plan are exercises at best in futility and at worst in dangerous consequences that cannot be foreseen. If these researchers are correct that

“Climate change... avoids straightforward articulation and is impossible to solve in a way that is simple ... Our changing conversations around climate science and conservation, the unique regional factors that determine the local consequences of climate change, and our ability to present endless possible solutions ... require we approach climate change with holistic and collaborative reasoning ...”

then it makes sense to allow the vastness of individual creativity and talent to come up with many different solutions, rather than to have legislation mandate only those few solutions chosen by a small group of individuals. Again, will they be held accountable when their Plan does not produce what they predicted?

After reading through most of the first three chapters, trying to parse through the word salad that they are, I skimmed the remaining 300+ pages. There is so much that is troubling in this Plan. As just one example, according to the Plan’s draft DAC map, Ulster County localities of Ellenville and Kerhonkson would be defined as DACs, but the community in between, Napanoch, would not. Seriously? Climate change adversely affects Ellenville and Kerhonkson residents, 10 miles apart from each other, but not those in Napanoch in between?

Thankfully, the Greene County Legislature boldly stood up for its citizens by submitting a report <https://www.greengovernment.com/wp-content/uploads/2022/04/CLCPA-Impact-White-Paper.pdf> and a resolution <https://www.greengovernment.com/wp-content/uploads/2022/04/Res.-No.-130-22.pdf> with comments regarding the Draft Plan. The White Paper explains well so much of what is wrong with the Plan and the Legislature summarizes perfectly the key problems:

“... the mandates outlined by the Climate Action Council take us down a narrow, expensive and risky path, centered on limiting homeowner choice, preventing research and innovation and electrifying everything.”
 – Patrick S. Linger, Chair

Respectfully,

Nadia Maczaj

Nadia N.S. Maczaj

cc.: Climate Action Council at ClimateAct@dec.ny.gov
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