



*The mission of the ADIRONDACK COUNCIL is to ensure the ecological integrity and wild character of the ADIRONDACK PARK.*

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April 29, 2011

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Francis J. Murray  
Chair, State Energy Planning Board  
c/o NYSERDA  
17 Columbia Circle  
Albany, NY 12203-6399  
Via Electronic Mail (email)

RE: Draft Scope for the 2013 State Energy Plan

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Dear Mr. Murray:

The Adirondack Council, New York's largest member based, not-for-profit organization dedicated to preserving the ecological integrity and wild character of the Adirondack Park, appreciates the opportunity to offer comments on the Draft Scope for the 2013 State Energy Plan ("Plan").

The Council appreciates the diligence of the New York State Energy Planning Board in the development of the Plan and thanks you for the opportunity to speak at stakeholder meetings. The Council generally supports the Plan's goal improve the state's energy systems, insulate consumers from volatile market prices, reduce the cost of energy in the state, minimize public health impacts, and identify policies and programs to maximize cost effective energy efficiently.

The goal of reducing dependence on foreign petroleum based products while bolstering our in-state production of clean and renewable energy will go far to improve the health and welfare of New York's citizens as well as the economy. However, the Council is concerned with the Plan's heavy reliance on the flawed Climate Action Plan.

The Climate Action Plan fails to place a significant emphasis meeting goals through energy conservation, efficiency and renewables. Additionally, the Council requests that the Plan do a complete life cycle analysis of proposed energy resources including a full analysis of costs of mitigation, and environmental and health impacts.

**EXECUTIVE DIRECTOR**

BRIAN L. HOUSEAL

**DEFENDING THE EAST'S GREATEST WILDERNESS**

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The Council is concerned that while the Draft Scope plans to assess the potential impacts of energy production and use on health and environmental justice, there is little evidence to suggest that the plan will place these important issues on equal footing as economic analysis. Also, when viewing the environmental justice and health analysis, the Council emphasizes that the Plan create a separate analysis for the special health and environmental issues the plaque the Adirondack Park.

Lastly, the Council strongly supports the goal to provide an inventory and forecast of greenhouse gas emissions as well as identifying strategies for increasing low carbon energy sources, carbon mitigation and adaptation. Additionally, while the Council is supportive of the Plan's goal to assess the impacts of SO<sub>2</sub>, NO<sub>x</sub>, and other harmful emissions that affect our air and water quality, we suggest the Plan be expanded to include mercury. Mercury, a neurotoxin most commonly produced from coal-fired power plants, can interfere with brain development.

In the Adirondack Park, mercury enters through watersheds and lakes where it is spread, most commonly, through the consumption of fish. High levels of mercury have been linked to reduced cognitive function in children of women who eat large amounts of fish during pregnancy and higher risk of heart attacks in adults. Warnings have been issued for children and pregnant women to avoid consuming any fish from Adirondack lakes and rivers.

The Adirondack Council thanks you for the opportunity to comment and hopes you will take our suggestions under advisement. We look forward to continued participation in the stakeholder process and to the release of a comprehensive energy plan that addresses the physical and economic health and welfare of New York's citizens.

Sincerely,



Alanah N. Keddell  
Legislative Associate