

President and CEO Doreen Harris
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399
CC: Governor Kathy Hochul and Interim Commissioner Sean Mahar

November 8, 2024

Dear NYSERDA President and CEO Harris,

The undersigned 226 organizations write to you in strong opposition to NYSERDA's irresponsible promotion of new, unproven, untested, and highly radioactive and expensive nuclear energy technologies. The Draft Blueprint for Consideration of so-called "Advanced" Nuclear Technologies is a concerning mix of uninformed and inappropriate "advocacy" by a state authority combined with a cursory and inaccurate analysis of the state of the nuclear industry. Governor Hochul and NYSERDA are attempting to launch a new generation of nuclear power plants in our state without an adequate public participation process and little to no consideration of this technology's serious health, environmental and economic problems.

The production of nuclear energy is an environmental injustice. Standing at less than 272 words of the draft blueprint, the "Environmental and Climate Justice" section failed to acknowledge the real, deadly harms faced by the Onondaga Nation, the Seneca Nation, the Ramapough Munsee Lenape Nation, and other environmental justice communities along the entire fuel chain of nuclear energy, including those who live close to existing reactors, uranium mines and enrichment sites, and nuclear waste dumps. We request that NYSERDA staff read the Red Paper by the Onondaga Nation, Haudenosaunee Environmental Task Force, and American Indian Law Alliance.¹ The Red Paper provides one of the best compilations of environmental injustices experienced by Indigenous peoples in New York and across the U.S., perpetrated by the nuclear industry and the governments that support it.

Nuclear reactors create grave and deadly health hazards. A new generation of reactors threatens the health of people living near such facilities and puts them directly in the path of radioactive and toxic exposures that cause increased cancers, birth defects, reproductive system diseases, and weakened immune systems.

Pursuing and funding nuclear energy deprioritizes renewable energy: Research shows that nuclear development competes with and can prevent interconnection of renewable energy.² An example of this is Japan: renewables were blocked from connecting to the grid due to policy choices by the Japanese government; even after the Fukushima disaster, they chose to invest in largely-failed strategies to restart the nuclear reactors vulnerable to earthquakes, volcanoes,

¹ Onondaga Nation, et al. Nuclear Reactors Are Not "Green." 30 Jan. 2020, www.allianceforagreenecconomy.org/sites/default/files/NukeRedPaper1-30-20.pdf

² Sovacool, B.K., Schmid, P., Stirling, A. et al. Differences in carbon emissions reduction between countries pursuing renewable electricity versus nuclear power. Nat Energy, 2020 DOI: 10.1038/s41560-020-00696-3

and tsunamis.^{3,4} In our own state, ratepayers paid over \$520 million to subsidize the old upstate nuclear reactors in 2023, while renewable energy has garnered just \$51 million.⁵ By 2029, nuclear subsidies will total over \$7 billion in public money. Imagine if we had invested that money instead in energy efficient appliances and insulation for the homes of New Yorkers.

Nuclear Power is exorbitantly expensive in comparison to renewables: There is no path to the construction of new nuclear reactors that will not involve a massive infusion of public dollars. New nuclear power costs about 5 times more than onshore wind power per kWh.⁶ While the report denigrates “overbuilding” solar, wind, and storage as a strategy to address the intermittency of generating sources, research has found that this is the most cost effective and efficient way to power a grid.⁷ “Overbuilding” could just as easily be called “building enough renewables and storage to meet our needs.” This idea should not be dismissed and deserves analysis to determine the cost and feasibility of achieving an optimized mix of renewables and storage to meet demand.

Small Modular Reactors are an unproven technology: The Draft Blueprint acknowledges there are questions of “technological readiness”, but it does not discuss the abject failure of the nuclear industry to deliver a product remotely on time or within the projected budget.⁸ In addition to needed skepticism over timelines and budgets, NYSERDA should not believe attempts by the nuclear industry to sell new reactors as being somehow friendlier to the environment. Contrary to the claim that SMRs are capable of producing less waste on page 22 of the Draft Blueprint, they may create *more* waste than conventional designs, and waste that is more chemically-reactive and volatile.⁹

Nuclear energy generates radioactive waste that is deadly for centuries: As there is no facility that will accept this deadly waste, the reactors in Oswego, Wayne, and Westchester Counties are in essence radioactive waste dumps. The shuttered West Valley nuclear reprocessing site is further testament to the failures of the nuclear industry to manage its waste in New York. It is one of the most contaminated places in the country, and despite decades of “cleanup” efforts and billions of federal and state dollars spent, this massive dump of long-lasting and radioactive waste threatens the Great Lakes watershed and the drinking water for millions of people.

³ Dreiling, M.C., Nakamura, T. & Braun, Y.A. Nuclear denial in Japan: the network power of an energy industrial complex. *Theor Soc* 53, 1–39 (2024). <https://doi.org/10.1007/s11186-023-09513-8>

⁴ Myth buster: Nuclear energy is a dangerous distraction. Climate Action Network Europe. (2024, March 19). <https://caneurope.org/myth-buster-nuclear-energy/>

⁵ Case 15-E-0302, Draft Clean Energy Standard Biennial Report (July 24, 2024). Page 89, Table 13. CES Financial Status Report for Calendar Year 2023.

⁶ Stanford University Professor Mark Jacobson’s 2024 U.S. House of Representatives testimony, titled “Seven Reasons Why New Nuclear Energy is an Opportunity Cost That Damages Efforts to Address Climate Change and Air Pollution” <https://web.stanford.edu/group/efmh/jacobson/Articles//24-01-MZJ-HRTestimony.pdf>

⁷ Budischak, C., Sewell, D., Thomson, H., Mach, L., Veron, D. E., & Kempton, W. (2013). Cost-minimized combinations of wind power, solar power and electrochemical storage, powering the grid up to 99.9% of the time. *Journal of Power Sources*, 225, 60–74. <https://doi.org/10.1016/j.jpowsour.2012.09.054>

⁸ Ramana, M. V. (2024, January 31). The collapse of nuscale’s project should spell the end for small modular nuclear reactors. *Utility Dive*. <https://www.utilitydive.com/news/nuscale-uamps-project-small-modular-reactor-ramanasmr-705717/>

⁹ Krall, L. M., Macfarlane, A. M., & Ewing, R. C. (2022). Nuclear waste from small modular reactors. *Proceedings of the National Academy of Sciences*, 119(23). <https://doi.org/10.1073/pnas.2111833119>

The State must follow democratic practices: On September 19, the PSC announced it is modeling nuclear power in its long-term electric system planning process.¹⁰ Good governance practices require that NYSERDA convene a judicious and comprehensive assessment and process with the involvement of the public and the Departments of Environmental Conservation and Health and insist upon an immediate halt to the PSC's modeling exercise until the state has made a decision.

NYSERDA must not waste New Yorkers' time and money in considering an unproven and dangerous technology with serious outstanding economic, environmental, and health problems that have not been addressed. Having reported that the state is behind on our renewable energy targets, now is the time for NYSERDA to focus all its resources and attention on achieving the 2030 and 2040 renewable energy mandates of the Climate Act. The costs of solar and wind power and battery-based energy storage are decreasing; they are low risk, quick to build, and proven. We must prioritize the deployment of these technologies to meet the legal mandates of the Climate Leadership and Community Protection Act. The draft blueprint is a costly and dangerous distraction that New Yorkers cannot afford.

Sincerely,

350Brooklyn
350NYC
All Our Energy
Alliance for a Green Economy
ArtRage Gallery
Bethlehem Morning Voice Huddle
Beyond Nuclear
Binghamton Citizens' Climate Lobby
Black at Cuse
BLARG South Shore Peace Group
Brooklyn For Peace
Burroughs Audubon Nature Club
Buy Local, Grow Local
Campaign for Renewable Energy
Cape Downwinders
Catskill Mountainkeeper
Cayuga Climate Action
Church Women United in New York State
Citizen Action of New York
Citizens Awareness Network
Citizens' Environmental Coalition

Clean Air Action Network of Glens Falls
Clean Air Coalition of Western New York
Clean+Healthy
Climate Crisis Working Group (IMV)
Climate Families NYC
CNY Solidarity Coalition
Coalition Against the Rockaway Pipeline
Coalition for a Nuclear Free Great Lakes
Coalition for Outreach, Policy & Education
Coalition to Protect New York
Coalition to Save Hempstead Harbor
Coastal Research and Education Society of
Long Island
Columbia County Reduces Waste--BYO
Communities for Local Power
Community Advocates for a Sustainable
Environment
Community Concerned About NL Industries
Concerned Families of Westchester
Concerned Health Professionals of New York
Council on Intelligent Energy & Conservation
Policy

¹⁰ See Case 20-E-0197, Energy Policy Planning Advisory Council Meeting, Sep. 16, 2024, recording available at: https://www.youtube.com/watch?v=-u_P_wVxB1M&list=PLA9Bpl_bclIjXZ0zIPkNqAE1G9YhJ1Txb&index=1, timestamp 55:06.

Daughters of Wisdom
District 1 Youth Advisory Board
Don't Gas the Meadowlands Coalition
Don't Waste NY
Dryden Solutions
Earthkeeper Health Resources
Eco-Logic at WBAI-FM
Elmirans and Friends Against Fracking
Energy Justice Law and Policy Center
Environmental Action Coalition
Environmental Justice Initiative
Environmental Justice Ministry of First
Unitarian of Rochester
Episcopal Diocese of Long Island
Food & Water Watch
Foodscraps360, LLC
For the Many
Fossil Free Tompkins
Frack Action
FrackBustersNY
Fridays for Future Capital District NY
Friends of the Earth US
Gas Free Seneca
Genesee Valley Citizens for Peace
Global Justice Ecology Project
Goshen Green Farm
Grassroots Environmental Education
Greater Gordon Heights Chamber of
Commerce
Green Choices Consulting
Green Education and Legal Fund
Green Glen Cove
Green Party of Nassau County
Green Party of New York
Green Party of Onondaga County
GreenFaith
GreeningUSA
Greenpeace USA
HabitatMap
HealthyPlanet
Hudson Valley Climate Science and Solutions
iEat Green

Indian Point Safe Energy Coalition
Indigenous Solidarity Network
Indivisible Binghamton
Indivisible Harlem
Indivisible New Rochelle
Indivisible Scarsdale
Interfaith Climate Justice Community of WNY
It's Easy Being Green
Larchmont/Mamaroneck Indivisible
Latin American Solidarity Committee of WNY
Peace Center
LEAF of Hudson Valley
Local Power LLC
Long Island Alliance for Peaceful Alternatives
Long Island Progressive Coalition
Long Island Social Justice Action Network
Mamaki
Manhattan Project for a Nuclear-Free World
Metro Justice
Montaukett Indian Nation
More Gardens Fund
Mothers Out Front Dutchess County
Mothers Out Front NY
Mothers Out Front Tompkins
Mothers Out Front- Westchester Rivertowns
NAMI Huntington
Nassau Hiking & Outdoor Club
Nassau Progressives
Neighbors of the Onondaga Nation
Network for a Sustainable Tomorrow
New City Neighborhood Association
New Hour LI
New York Climate Action Group
New York Progressive Action Network
New York Solar Energy Society
New York Sustainable Business Council
Newburgh Clean Water Project
News from the Neighborhood
No North Brooklyn Pipeline Alliance
North American Climate, Conservation and
Environment (NACCE)

North American Megadam Resistance Alliance
North Country Earth Action
North Country Peace Group
North Shore Audubon Society
Nuclear Information and Resource Service (NIRS)
Nukewatch
NY Climate Advocacy Project
NY Energy Democracy Alliance
NYC Friends of Clearwater
NYC Reduces
NYC Safe Energy Campaign
NYCD16 Indivisible
NYPAN Environmental Committee
NYPAN of the Southern Finger Lakes
NYS Public Health Association
Occupy Bergen County
Orange Residents Against Pilgrim Pipelines
Outdoor Promise
Partnership for the Public Good
PAUSE (People of Albany United for Safe Energy) / 350Albany
Pax Christi Long Island
Peace Action Manhattan
Peace Action New York State
Peckham Action Group
People for a Healthy Environment
Physicians for Social Responsibility - New York
Piermont Marsh Alliance
Piermont Pier Alliance
Piermont Rowing Club
Possible Rochester | Possible Planet
Progressive Schenectady
Public Citizen, Inc.
PUSH Buffalo
Putnam Progressives
Radiation Truth
Radix Ecological Sustainability Center
Rensselaer Environmental Coalition

Rensselaer Polytechnic Institute Sunrise Movement
Rivers & Mountains GreenFaith Circle
Riverside-Salem United Church of Christ
Rockland Coalition to End the New Jim Crow, Environmental Committee
Rockland Environmental Group
Roctricity LLC
RootsAction.org
Sacred River Healing
Safe Energy Rights Group
Samuel Lawrence Foundation
Sane Energy Project
Save the Pine Bush
Science and Environmental Health Network
Seneca Lake Guardian
Setauket Harbor Task Force
Showing Up For Racial Justice (SURJ) Westchester
Shut Down Indian Point NOW!
Sierra Club Atlantic Chapter
Sisters of Our Lady of Christian Doctrine
Sisters of St. Dominic of Blauvelt, NY
Slow Food North Shore
Snake River Alliance
Solar United Neighbors
Solarize Albany
Solidarity Alliance of the Capital District
South Asian Fund For Education, Scholarship, and Training Inc
South Country Peace Group, Inc.
South Shore Audubon Society
Stop Holtec
Stop NY Fracked Gas Pipeline
Stop the Algonquin Pipeline Expansion
Strawtown Art & Garden Studio
Suffolk National Organization for Women
Suffolk Progressives
Sullivan Alliance for Sustainable Development (SASD)
SUNY New Paltz Environmental Task Force

Sustainable Finger Lakes
Sustainable Putnam
Sustainable Warwick
Syracuse Cultural Workers
Syracuse Peace Council
The Corridor Counts, Inc.
The Praxis Project
Third Act Upstate New York
Thomas Berry Forum for Ecological Dialogue
 at Iona University
Three Mile Productions
Tompkins County Climate Protection Initiative
Transition Town Port Washington
Udja Temple
Ulster Activists
United Climate Action Network (UCAN)
United for Action
United For Clean Energy
United for Safe Energy

United Neighbors Concerned About GE
 Dewey Landfill
Upper West Side Recycling
Uranium Watch
Urban Homesteading Assistance Board
UU Congregation of Binghamton, Green
 Sanctuary
Veterans for Peace Chapter 51
WE ACT for Environmental Justice
WESPAC Foundation Inc.
West Village Residents Association
Westchester Alliance for Sustainable
 Solutions (WASS)
Westchester for Change
Western New York Drilling Defense
Western New York Environmental Alliance
Western New York Peace Center
World Can't Wait
Zero Waste Ithaca