

Jenna Kay

From: Cathryn Chudy <chudyca@gmail.com>
Sent: Sunday, January 5, 2025 3:13 PM
To: Jenna Kay
Subject: Public Comments on the Draft Climate Element Policy List, to EJC (and CAG)

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Jenna,

I am submitting these comments to the EJC (and CAG) out of concern for finding that "nuclear in the form of small modular reactors" appears on p. 9 of the Draft Climate Element Policy List for EJC Review at the EJC meeting on 1/06/25:

Buildings & Energy

P2. The county shall support both energy choice and clean, renewable, energy sources. The county's policies and regulations on building energy sources shall be consistent with state and federal laws. The county shall not make anyone switch to a particular fuel source. However, the county shall only encourage, promote, and incentivize renewable and clean energy sources with zero or negative greenhouse gas emissions. This includes, but is not limited to: utility-scale, community-scale and/or household scale wind and solar power, methane biodigesters, renewable natural gas, geothermal, and **nuclear** in the form of small modular reactors. The county shall promote self-reliance and community capacity to respond to emergencies, such as with distributed energy resources and energy management systems, microgrids, and virtual power plants

Climate G25-P2

The [White House Environmental Justice Advisory Council](#) (WHEJAC) lists "The procurement of nuclear power" under the heading "Examples of the Types of Projects That Will Not Benefit a Community."

In their May 2021 [Cover Letter](#) of Recommendations, the recommendation is for sun-setting investments in nuclear among other sources that harm communities:

[Justice40](#) must include taking bold action to sunset investment by 2030 in fossil fuels, plastics, dangerous chemicals and nuclear energy and to set requirements for 100% renewable electricity by 2030.... [White House Environmental Justice Advisory Council Final Recommendations Cover Letter](#)

I ask the EJC committee to look more carefully at how including "nuclear in the form of small modular reactors" in the list of energy choice sources, you are inherently contradicting the core of your committee's basic charge as included in your document under Health and Well Being:

Health & Well-being

G2: **Advance environmental justice** through the Clark County Comprehensive Growth Management Plan

and associated plans, policies, development regulations, and strategies.

Environment G2

5 GHG; RES Health & Well-being

P1. The county shall review, evaluate, and update as needed practices, processes, procedures and

structures to **advance environmental justice** through all Comprehensive Growth Management Plan

amendments, associated plans, policies, development regulations and strategies per RCW 36.70A.070.

Environment G2-P1

Nuclear in the form of small modular reactors is still nuclear energy, as yet extremely expensive and still speculative, that until proven otherwise likely will bring with it similar environmental harm impacts as existing nuclear, that fall disproportionately on those least able to absorb even more environmental risks and harms than they already live under. It does not belong in energy source priorities for our community.

A few resources addressing nuclear power as an environmental injustice with as yet unresolved harms and risks

[Nuclear Power and Environmental Injustice](#)

[Emerging Issues in Nuclear Power and Radioactive Contamination](#)

[Nuclear Powering Towards a Just Transition?](#)

Thank you for your consideration,

Cathryn Chudy

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