

December 6, 2020

Re: Case 15-F- 0302 Comments on Draft Regulations

Dear Secretary Phillips,

It was obvious from the inception of the Climate leadership and Community Protection Act (CLCPA) passed under cover of the Covid-19 pandemic that Community Protection was not the objective. Rather the objective was to expedite the siting of Industrial Solar and Wind projects to satisfy purely political goals. Siting is bogged down in the Article 10 process because of intense local opposition. One of the casualties of CLCPA is Home Rule. I offer the following comments regarding Industrial Solar and Wind Installations to correct this erosion of local authority.

Para 90-2.25 Exhibit 24 Local Laws and Ordnances

The Office of Renewable Energy Siting (ORES) must be bound by local policies, laws and ordnances as should all applicants. Many rural communities, which are the main target of renewable energy siting have long standing policies that protect the "rural character of their communities." In the case of the Town of Somerset, Comprehensive Plans and the associated Ordnances dating back to 1974 reflect this policy. Revisions in the ensuing decades have maintained and strengthened this approach. Numerous surveys, one of them most recently, reflects overwhelmingly the support for this long standing policy of maintaining the rural character of our town.

Home rule must be maintained and those most effected by the Industrialization of their community should have the final say in any siting decision as they will bear a disproportional share of the negative impacts of Industrial Solar and Wind projects. Please modify the above referenced paragraph to reinstate Home Rule.

Respectfully,

James C. Hoffman

Town of Somerset

ORES Public Comment submitted 12/6/2020

This comment pertains to Section 900-2.7 Exhibit 6 Public Health Safety and Security (c) A Safety Response Plan to ensure the safety and security of the local community. This is an area where current research in regards to safety is changing continuously. Newly developed technologies should be required to be included in already permitted projects, thereby ensuring the safety of the residents of the host community. For instance, Sandia National Laboratories, already cited under Section 900-2.7, Visual Impacts, has developed a new in-line connector with a self extinguishing polymer material for solar panels that will automatically predict and prevent arc fires and explosions as the result of the photovoltaic arc faults, caused by high power discharges, corrosion or damage. This is a new technology, one that will prevent the ignition of electrical fire, and is most appropriate for rural areas of New York, many of who rely on volunteer fire departments. Regular updates and installation of improvements of this type should be required during the life of each solar projects and also for Lithium Ion and other batteries used for battery storage.

Georgette Stockman