

## **TO SUBMIT COMMENTS (deadline June 10):**

Comments may be submitted via email to [scopingplan@nyserda.ny.gov](mailto:scopingplan@nyserda.ny.gov), through the State's [online portal](#) or via mail by using the form and address found at the portal link. The portal asks for the chapter of the Draft Scoping Plan when comments are submitted so chapter references are listed next to each issue.

[Contact SOS](#) with questions or to let us know that you sent in a comment!

## **List of Issues and Suggested Comments to get you started...**

### **Issue 1 (related to Chapter 5): We do not want a sales pitch**

The Draft Scoping Plan is not forthcoming about unpopular or problematic aspects of what is being proposed. For example, the 330-page, 24 chapter Draft Scoping Plan mentions “land-based wind” twice and does not reference any targets. These projects have proven to be highly unpopular and yet, along with large-scale solar, large-scale onshore wind is a foundational component of the draft Plan presented in the charts found in the appendices.

#### **+Suggested comment:**

The Plan should clearly designate the pros and cons with attention given to specific impacts to New Yorkers– both positive and negative. And that includes rural New Yorkers! Citizens do not want a sales pitch; we want an explanation. How will new energy generation upstate be delivered downstate? Is the environmental harm of large-scale renewable energy projects in pristine upstate environments worth the meager emissions reduction benefits? (Because the wind and sun are not constant, wind generates 30% of its capacity on average, solar 20%, and this results in the need for reliable gas-fired backup power plants to always be ready.) All presentations must be in non-technical language. Provide links to all the data with clear lists of what items are included in each calculation. The Draft Scoping Plan is missing these elements and does not answer basic questions.

### **Issue 2 (related to Chapter 13 - Electricity): Land-based wind**

The Plan includes 9.5-11 GW of land-based large-scale wind requiring up to 1.1 million acres of leased land which, given New York geography and population density, is beyond New York State citizens' willingness to accept. The more that these large-scale projects are built the harder it will be to site more of them as the “easy” locations are taken and the projects move closer to wilderness areas, wildlife management areas, parks, Native American lands and populated areas. **It is not reasonable to expect that towns must carve out 1.1 million acres to be industrialized for electricity generation. This is the equivalent of 1700 square miles.**

#### **+Suggested comment:**

It is unrealistic to rely upon this scale of wind power given the extensive land requirements and widespread opposition.

### **Issue 3 (related to Chapter 13 & Chapter 15 - Agriculture): Large Scale Solar**

The Plan includes 60-65 GW of solar which will require large-scale solar on agricultural land that is already less available due to other causes. An estimated 225,000 to 315,000 acres will be required to meet this goal in the coming years. Climate change is likely to increase the need for viable agricultural land.

**+Suggested comment:**

Most of the land for massive large scale solar will come from active farmland, significantly reducing this important economic and societal resource at a time when local food sources are in great demand.

**Issue 4 (related to Chapter 13): Rural Communities**

The Scoping Plan is ignoring the land limitations and the impacts to rural communities that exist in its recommendation to site so many large-scale land intensive renewable projects in New York. The state plans to “educate” the public and provide economic incentives in hopes of gaining more support. These actions will not change the basic geographic limitations and the negative impacts to intangibles such as open space, quiet nights, and close community relationships that drive the opposition to large-scale renewables.

**+Suggested comment:**

It is foolhardy to base an energy plan on intermittent renewable energy sources that may displace a significant number of rural residents.

**Issue 5 (related to Chapter 13): Gap in energy generation**

The Plan moves New York away from stable reliable energy generation. The Plan’s “scenarios” all have a gap in electricity generation during the winter that they propose to fill with currently unavailable but hoped-for future developments like green hydrogen or better batteries which would require even *more* wind and solar. A plan without sufficient reliable power is not a reasonable plan. (If reliable nuclear power were part of the Plan, more large-scale renewables may not be needed to achieve the Climate Act’s targets.)

**+Suggested comment:**

The Plan must provide options for the possibility that New York does not meet its renewable energy targets, and must recommend technology that is in existence today, such as nuclear, for firm capacity. Hoping that something will be developed is not a reasonable plan.

**Issue 6 (related to Chapter 8 – Public Health): Industrial wind noise**

The Plan fails to adequately address the health problems with industrial wind noise and infrasound.

**+Suggested comment:**

The Plan acknowledges a negative health impact from wind turbine noise but does not acknowledge the immediate need for solutions to this problem. The state Department of Health has determined that, in order to protect public health, more stringent noise standards than are being applied in state permitting proceedings are needed. Wind turbines generate over 100 decibels of noise in very quiet areas. It takes over a mile for that level of sound to degrade to tolerable levels. The Plan must take into account the number of people potentially likely to be harmed by the 1.1 million acres of leased land projected for new wind projects and must include plans for reducing the noise impact on rural communities.

**Issue 7 (related to Chapter 13 and Chapter 15 – Ag & Forestry): Conflict between industrial renewables and forest preservation.**

The Plan does not address the glaring conflict between the need to preserve (and increase) carbon sequestration by New York’s lands and forests, and the clearing of lands and forests for land-based wind and industrial solar projects. Existing permitted projects have cleared thousands of acres of forested land. The new wind and solar projects proposed under this plan will require clearing tens of thousands more.

**+Suggested comment:**

It makes no sense to cut down mature forests to make room for wind and solar projects. But the demand for renewables is already causing this to happen.

**Issue 8 (related to Chapter 13): Substantial risks**

In Appendix G, the Plan acknowledges but does not highlight or include in the summaries the serious risks with the Plan’s proposed transformation of our energy systems.

**+Suggested comment:**

There has been a failure to clearly enumerate and highlight the risks of this extremely aggressive plan considering the use of unproven and controversial technologies and the requirement for massive tracts of land. The uncertainty associated with this risk puts the future of the state’s economy into question.

**Issue 9 (related to Chapter 10 – Benefits): Costs**

The Draft Scoping Plan gives an estimate of about 300 billion dollars as the cost. Yet, further in the appendices we found that the entire cost for reaching all the State climate goals is 2.7 trillion dollars (what the Plan calls the “reference case”) in addition to the \$300 billion. This makes the economic cost for the state **three trillion dollars over the 28 years of the plan**. It is not clear how this will be financed.

Some of the \$2.7 trillion “reference case” cost is for items that we would purchase even without the state climate goals, such as purchase of a gas-powered vehicle or replacing an old appliance. However, the “reference case” also includes the costs of reaching 70% renewable electricity generation by 2030 with 9 gigawatts of offshore wind turbines and many other climate goals. By hiding many costs in the “reference case”, the Draft Scoping Plan is not being honest about the costs to New Yorkers. Without any clear breakdown of the \$2.7 trillion it is reasonable and accurate to include this entire amount in the cost along with the \$300 billion that the Draft Scoping Plan discusses in detail. This brings the total cost to 3 trillion dollars.

**+Suggested comment:**

Three trillion dollars is an astounding amount of money to commit to this risky plan.