

SAVE ONTARIO SHORES, INC.
P.O. Box 382
LYNDONVILLE, NY 14098

June 28, 2022

NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

RE: Draft Scoping Plan, Chapter 5 – Overarching Purpose & Objectives of the Scoping Plan

To whom it may concern:

Save Ontario Shores Inc. was founded in 2015 in response to a proposed land-based industrial wind project in the towns of Yates in Orleans County and Somerset in Niagara County. For over seven years we have gathered information, provided educational presentations, and advocated on a local and statewide level to ensure that the needs and concerns of our rural residents regarding industrial renewable projects were being heard. We have actively participated in both Article 10 and 94c proceedings. We have hundreds of supporters and are 100% locally funded.

Our extensive experience with siting large-scale renewables in rural towns and our location gives us a unique perspective and we appreciate your consideration of our comments on Chapter 5 of the Draft Scoping Plan.

Sincerely,

/s/

Kate Kremer
Vice President
Save Ontario Shores, Inc.

Chapter 5: Overarching Purpose & Objectives of the Scoping Plan

New Yorkers deserve comprehensive data and an explanation of exactly what is planned and how it will impact us.

The Draft Scoping Plan (the 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 for land-based wind. This gives the impression that land-based wind is not a key feature of the Plan. Yet nothing could be further from the truth. Land-based industrial wind 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.

Land-based wind does not have a specified quantity enumerated. Why? It is the only renewable energy source that does not have a GW listed in the Climate Act. In “New York’s Climate Directives” listed in Chapter 3, page 17 of the Plan, once again no mention of onshore wind is included. This fact is highly suspicious. Another example of a failure to mention onshore wind can be found in Appendix G, Section I, Page 84-85:

Wind, water, and sunlight power most of New York’s economy in 2050 in all Pathways. Even with aggressively managed load, electric consumption doubles and peak nearly doubles by 2050, and NYS becomes a winter peaking system by 2035. Offshore wind on the order of 20 GW, solar on the order of 60 GW, and 4- and 8-hour battery storage on the order of 20 GW by 2050. Firm, zero emission resources, such as green hydrogen or long-duration storage, will play an important role to ensure a reliable electricity system beyond 2040.

Land-based large-scale wind projects have been strongly opposed in the last decades. The Plan with its public involvement component has not made this unpopular portion of the plan apparent. *This shows a lack of transparency and honesty that does not bode well for this massive statewide transformation.*

Without honest, clear descriptions of problematic aspects of the Plan, the document is nothing more than a sales pitch. It is as if the Climate Council is trying to sell citizens of New York on their plan. The Climate Council has presented a “commercial” of sorts and citizens are left to dig through a 500+ page set of Appendices to attempt to figure out the basis for the claims.

What we need for such a drastic and rapid transformation is for the Climate Council to clearly indicate the potential costs and risks alongside the proposed benefits. The benefit of this type of clarity would be a greater likelihood that citizens could give helpful and insightful comments.

The Plan should clearly designate the projected specific impacts to New Yorkers– both positive and negative. All presentations must be in non-technical language. This has not been done. Many portions of the Plan use language and phrases that are not common.

In today's tech world there is no excuse for not providing links to data that is the basis for each discussion. 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.

And finally, as part of a transparent document, there should be a much more thorough discussion of the cost benefit projections. What was included as a cost and as a benefit? What was omitted from each projection? How reliable are the numbers? Are there other possible methods for projections? The benefits and costs are elusive. It is near impossible to understand the calculations. And yet they are pivotal for the argument being made that the benefits are greater than the costs.

We would prefer that the Climate Council say honestly that the benefits are present but hard to quantify. Or that this is one assessment of possible benefits but that there are other ways in which to crunch the numbers. Or that for various reasons some items have not been included and this may impact the meaning of the numbers. The point of all of this should not be to make us feel good about the Plan but should be to educate us about exactly what the Plan is. That has not been done.