

SAVE ONTARIO SHORES, INC.
P.O. Box 382
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June 28, 2022

NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

RE: Draft Scoping Plan, Chapter 8 - Public Health

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 8 of the Draft Scoping Plan.

Sincerely,

/s/

Kate Kremer
Vice President
Save Ontario Shores, Inc.

Chapter 8 – Public Health

Industrial wind noise

The Draft Scoping Plan (the Plan) fails to adequately address the health problems associated with industrial wind noise and infrasound.

Chapter 8 of the Plan entitled “Public Health” acknowledges that onshore wind energy will be “increasingly adopted” and that there are unique health impacts caused by industrial wind turbine noise that will need to be dealt with at some future date “as scientific understanding evolves”.

In Chapter 8, page 60, the Plan spends one paragraph defining annoyance as a negative health effect from the industrial wind turbine noise:

Health concerns associated with onshore generation of wind energy are limited. Physical safety concerns can be mitigated through the choice of appropriate minimum setbacks (the minimum allowable distances between turbines and roads, property lines, or structures). Annoyance, associated with wind turbines producing characteristic sounds or noise as wind passes over the rotating blades, is a health effect according to the Environmental Noise Guidelines for the European Region, published by the World Health Organization in 2018. Data indicates that noise from wind turbines may be more noticeable, annoying, and disturbing than other community or industrial sounds of the same level. Reviewing acceptable noise thresholds for wind turbine siting as scientific understanding evolves will be important as onshore wind energy is increasingly adopted.

This paragraph is insufficient to address the concerns and the impact of 1.1 million acres of industrialized noise spread across the state. Save Ontario Shores submitted substantial details of the insufficiency of the Office of Renewable Energy Siting (ORES) noise regulations for large scale renewable projects. The evidence was not considered. The ORES regulations were written by developer consultants and were unchanged despite documented deficiencies. This will become a growing problem as these projects are forced into more and more communities.

There is an assumption in this Chapter 8 paragraph, quoted above, that the existing ORES regulations are sufficient for existing scientific understanding and that only “as scientific understanding evolves” is there the need for review. The ORES regulations were based on the developers’ interpretation of the scientific understanding. Towns and citizens believe that scientific understanding has not been carefully reviewed. Considering the incredible push for rapid expansion, the State must take the time to review and analyze and revise the existing standards so that they match existing scientific understanding.

The ORES regulations and procedures ensure that no citizen or town will be able to initiate the process to review “acceptable noise thresholds for wind turbine siting as scientific understanding evolves” because the process to raise issues is too cumbersome and the scale tilted toward the developers.

ORES provides for no automatic noise review of industrial wind turbines as technology pushes the size to greater heights and the blade size increases. Do you have any idea of how big these machines have become? One blade is over 250 feet, getting close to the length of a football field and the height has doubled in size over the last 10 years. Unlike other sources of noise, wind turbines operate 24/7 when there is sufficient wind. Even airport and highway traffic subside at night. If the wind is blowing, then the wind turbines will be operating.

The Draft Plan, in its reliance on over one million acres of land to be impacted by industrial wind turbines, must require that the noise regulations for onshore industrial wind turbines be reviewed and strengthened to protect residents.