

February 28, 2022

NYSERDA  
Attn: Draft Scoping Plan Comments  
17 Columbia Circle  
Albany, NY 12203-6399

Dear Climate Action Council:

After reviewing draft scoping plan ideas, I am of the opinion that the Council is working toward an unrealistic goal of net zero emissions in the proposed time frame.

**Eliminating the use of fossil fuels including natural gas and gasoline**

**PROBLEMS:**

- Not practical! Electricity is by far the MOST EXPENSIVE utility! NYSEG and National Grid customers already endure numerous outages which only confirms that current electrical supply grids cannot support the increase in demand created by adding electric vehicles and more all electric appliances to a burdened system. There is no plan in place that has been shared in the public forum to increase capacity to the level needed to support the new demand. The cart is before the horse!
- Can you honestly envision electric jets, submarines, spacecraft, fireplaces, or “silent” electric NASCAR? How would you expect to charge a giant John Deere Harvester in the middle of a 300 acre farm when the batteries ran down? There are countless other applications that are also extremely impractical for electric.
- Eliminating gasoline/diesel powered agricultural, industrial equipment and personal vehicles is impractical in colder northeastern climates. The cold is brutal on batteries resulting in shorter running time and travel distances. Charging stations would not be available everywhere, especially in more rural or farming areas and may not be conveniently located for many people. How many charging stations would be made available for residents of high rise apartment complexes that need daily charging for their job commute? Charging time ratios of hours to mileage distances vary by the level of charging options available and are not practical. AAA offers simple to understand EV charging information for your review. Are there ANY charging stations in Buffalo to support the electric cars being made by automobile manufacturers?
- In the event of weather emergencies (snow, flooding, high wind events) power outages could result in lack of rapid mobilization for emergency crews like fire, police, first aid, utility crews and AAA motorist assistance. How do you respond to an emergency without immediate power to maintain that fleet of emergency vehicles? Converting New York to a primarily electricity dependent area does not make sense based on weather and temperature fluctuation alone. Add in the conversion costs, inconveniences to daily living, disruptions to business and commerce, landscape/infrastructure disruptions and your proposal loses most of its implied benefit and appeal. It will cripple economic stability.
- Electric vehicles CANNOT be recycled so new landfill sites that can accept hazardous waste will need to be designated to dump them. Does this really help the environment you propose to protect?

- Electric vehicle insurance costs are 25% higher than for gasoline vehicles, electric vehicles wear out tires faster than gasoline vehicles (more tires for the landfills), home charging stations require electricians to install them and those hundreds of dollar costs are paid by the consumer and if you keep your car long enough, full battery replacement costs can exceed \$20,000!
- Specialized technician training and tools are required to service electric vehicles creating more expense for service centers which is then passed on to the consumer.
- Missing from many discussions are the safety hazards caused by damaged electric cars. An impact accident, pothole or vehicle forced off road could result in fractured batteries that can create a fiery inferno that can burn for weeks, jeopardize personal safety, destroy adjoining property and it CANNOT be extinguished with water. Water makes it burn hotter and longer! The recent news story about the Felicity Ace ship loaded with high-end vehicles that burned out of control on its way to US customers supports the danger that could be encountered from a battery problem on electric cars. A battery flaw/fracture could cause a fire threat in your own yard or even worse, your home garage!
- Emergency responders and fire fighters need to be re-trained and given new tools, extinguishers and equipment to handle the new type of emergencies created by electrical vehicles. This results in more expense to the community they serve and the potential of health risks associated with fire extinguishing chemicals.
- Electric car batteries require rare earth minerals which would involve invasive mining practices. Is trying to improve air quality by destroying land quality and natural resources a well thought out policy? Is favoring electric utility exclusivity worth the resulting damage?

#### SUGGESTIONS:

- Initiate environmental impact studies to determine if creating and promoting appliances and vehicles that require landfill disposal and cannot be recycled, meet the definition of environmentally responsible and truly promote a "greener" world.
- Conduct return on investment (ROI) studies to prove the total REAL cost for these proposals will outweigh the perceived benefit
- Incentivize production of more fuel conservative gasoline/diesel engines and cleaner exhaust
- Investigate hydrogen powered vehicles and other alternatives
- Reward individuals and businesses through rebates and tax incentives for using more energy efficient equipment, vehicles and building materials; both gas and electric
- Dramatically slash KWH electricity costs for all applications and uses
- Designate more urban greenspace and promote reforestation projects. Trees are nature's air filtration system and too many have been lost in the name of progress through careless land clearing, forest fires and an increased demand for paper products.

#### **Solar power**

#### PROBLEMS:

- Looking out the window and seeing clouds and gray days for much of the year would seem to indicate that energy savings from solar panels is very minimal in WNY. The panels on home roof tops are ugly, a fire hazard, a homeowner's insurance nightmare, difficult for firefighters to deal with and are NOT recyclable. That means they are not environmentally friendly as touted because they considerably add to landfills.

- Solar “farms” take up considerable land mass, are weather sensitive especially with snow depth and weight, ice covering, hail, lightning strikes and cloudy days. They can be damaged by wildlife, birds, wind driven debris, etc. They are typically difficult to access and maintain, they require a method of storage like batteries or a mode of transmission to contribute to the electrical grid. The infrastructure to incorporate solar energy benefits does not currently exist. Why invest in and build solar farms with no way to harness the energy they produce? Failed panels go to landfills as non-recyclable soil-polluting waste products. After Love Canal, the state should be especially vigilant about eliminating known sources of pollution to the land, air and water.

### Wind turbines

#### PROBLEMS:

- The entire world is moving FORWARD with nuclear energy, hydrogen vehicles, fuel efficient automobiles and energy conserving construction materials. Why would the state of NY want to regress by implementing larger versions of 1800’s windmills for its energy? If windmills were efficient, successful energy producers, they would be used everywhere in the world as the primary and preferred energy source. Their lack of worldwide full scale implementation says it all. They are very inefficient unless they have ideal, sustained wind at specific speeds. Have the Council do the research and contact the National Weather Service for the annual wind stats in Western New York. It will be apparent that our state does not offer “ideal operating climate conditions” for windmills.
- Our natural shorelines and typography are breathtakingly beautiful; windmills threaten the bird population, litter the ground with toxic fiberglass shards, are difficult to service and maintain and are an eyesore. Their height, size, construction, sound, vibration, tendency to leak hydraulic fluid, short lifespan, high failure rate and non-recyclable materials all negatively impact our local environment. They are disruptive to nearby residents and most notably they negatively impact the land area surrounding the installation site. **The absolutely most detrimental choice would be to consider their installation in Lake Erie.** Our freshwater lake is an IRREPLACEABLE natural resource providing clean drinking water and recreational opportunities for the community through swimming, fishing, and boating. Not all that long ago, it took many years of effort to clean and reclaim our lake from pollution and it should NEVER again be threatened with the possibility of environmental disaster by disturbing the lake bed.

#### SUGGESTIONS:

- The U.S. is home to the best and brightest minds at universities, the Army Corps of Engineers, researchers, scientists and private industry innovators. Those great minds should be enlisted for input before moving forward with any rushed initiatives in the name of undefined “climate justice”.
- Publish your environmental and engineering studies supporting the short term and long safety of your proposals. It is very important to demonstrate how these initiatives will be financed, how long it will take to see a benefit and WHO will benefit from these proposed projects.

#### **Bans:**

- With an ample supply of oil and natural gas, New Yorkers should insist on maintaining their ability to choose the best cost effective energy option for their vehicles, homes and communities. Bans eliminate choice. Bans should be banned.

**Community investment****PROBLEMS:**

- What is the criteria used to determine “disproportionately impacted communities” by climate change? Floods, fire, tornadoes, crop loss? Where is the funding for this coming from? Local? State? Federal? Aren’t disaster relief organizations like the Red Cross, FEMA, numerous agencies and local support groups already set up for these issues?
- Currently there are significant concerns about many infrastructure shortfalls and lack of cable access for education in many communities. Shouldn’t some of those basic practical needs of the tax paying residents be addressed before focusing on unattainable full electric conversion for the entire state? Using the guise of “reduced air emissions” to justify impractical, expensive, land altering, natural resource devastating, environmentally polluting measures is unconscionable. Who benefits?

**SUGGESTIONS:**

- Think outside the grid!
- Listen to the voters and the experts. Great ideas are readily supported. No bans required.

Thank you for allotting time to read my letter. As a lifelong NY resident, I appreciate the opportunity to express my concerns and provide comment on the climate action discussion.

Respectfully,



Caryn Goellner  
Elma, New York