Comments on

New York State Climate Action Council Draft Scoping Plan, Dec. 30, 2021

In my assessment, this Scoping Plan is the work of dreamers, not doers. Please govern our state by envisioning the future, careful review of the possibilities to reach the vision in realistic timeframe and realistic consideration of the cost and benefits to citizens of both upstate and downstate. It is a worthy goal to affect change to reduce risk to our climate and to reduce negative environmental impacts to all creatures of earth. Please take the time that is needed to do the work right the first time and to understand the total cost of the work.

“Technology advancement will continue to be vital” is an understatement. Please learn from the relatively recent lesson from the NYS Thruway Authority:

*Nearly ten years ago, the New York State Thruway Authority (NYSTA) sought to install five wind tribunes at various stops along New York’s Thruway. Approximately four years after installation, the wind turbines were taken offline due to mechanical issues. An $8.1 million lawsuit filed by the New York State Thruway Authority, against five companies involved in the wind turbine project, was recently dismissed by the New York State Supreme Court.*

The Plan states, “To achieve a more resilient, efficient, and balanced grid, new technologies will be required…” It is not realistic to set specific dates and eliminate so many hybrid solutions on only a “wish” for “new technologies”.

Renewable solar and wind are not available on demand. Today’s technology in battery storage is not sufficient for your scoped timeline. It is frightening to consider the fast ramp up of mining for rare earth minerals in conflict countries, in communist countries, in deep sea operations, if I may extrapolate NYS actions to world actions. The environmental impacts could easily outweigh any benefits.

NY citizens should see the results of a life cycle assessment on the energy sources before stepping down this path. Mining of raw materials: change of land use; reuse/recycle/disposal of spent components for solar and wind generation will have environmental impacts. We should have the opportunity to understand them prior to acting too fast.

Please open the scope to include phasing in, including of alternative/mixed energy solutions for many more years, such as nuclear power, green hydrogen, dual-heat options. Please include representatives of labor and energy on the Climate Action Council for wider expert views to NY energy policy.

Allow regional solutions for regional differences. Weather is >50% colder in Western NY than NYC area. >90% of energy used on the coldest winter day in WNY is natural gas. Significant the cost burden will fall on upstate citizens.

Reliability of power supply is a large risk, with this fast track plan. The Plan states, “…dispatchable and emissions-free resources will be needed to balance the system and must be significant in capacity, be able to come on-line quickly, and be flexible enough to meet rapid, steep ramping needs.” Before taking steps to eliminate current and reliable energy sources, sources must be defined, feasibility, risks and costs defined.

Finally, I find no comprehensive cost analysis on how to pay for any of the Plan’s actions. I do see direct costs to consumers. I know many businesses have left and will leave NYS because of the business atmosphere, including taxes. More real data is needed to support the cost/benefit of the planned actions. I request an impartial review of the data sources and assumptions in, “10.3 Key Benefit-Cost Assessment Findings” as a first step.

The enthusiasm to be a leader in improvements is laudable. I see several pieces of legislation proposed that are impatient to get going, even faster than this scoping plan (S.6841/A.8431, S.8198, S.5939/A 6761). The risks of unintended consequences is great. Early failures can jeopardize the trust of the citizens and the success that can come with careful planning and timely implementation.

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