

Although I was not able to review the entire 800 + page document, I did want to share some concerns that I have with the draft scoping statement as a life long resident of New York State. I have very serious concerns with the direction of this plan and that it will negatively impact the health, safety, welfare, and financial viability of New York State and its residents into the future. As a mother of three children, and a very environmentally minded individual (always looking to reuse and recycle, conserve water etc.). Although, this letter is from me as an individual, I would also like to share that I am currently serving as an elected Town Councilwoman for the Town of Barre, and that we currently have two large scale renewable energy projects that if both are approved will consume about 25% of our land, has divided our community and cost our community significantly. At the same time the NYSIO reports continue to point to the inability of utilizing the power generated from these facilities where it is needed in downstate NY, and the demand not growing enough in upstate to utilize these additional projects. NY has doubled down on getting large scale electrical utility projects approved in upstate NY where we are operating carbon emissions free at 92%. In addition, these projects have projected life spans of only 20 to 30 years, with technology changing so quickly that in one of the proposed projects for our community they have changed the anticipated model and size multiple times, and are now proposing that they need fewer turbines because the technology has changed so much in the past year. Why not wait until the infrastructure is built to facilitate electricity generation in upstate load zones A-E to be able to be utilized down state, and then invest in the projects when the technology and capacity is greater. Please see my comments to the the specifics of the draft scoping plan below:

- Issue 1 (related to Chapter 5):
  - Proposals should be just that, and be forthcoming about potential problems or weaknesses of the proposal, including both the pros and cons; specifically where NYS residents will be significantly impacted, including rural New Yorkers!. 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. The unpopularity of industrial wind projects can be seen by looking at the ORES approved projects and applications; there are significantly more proposed solar projects than wind projects. We are looking for answers to questions such as:
    - 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):

- 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): Electricity generation is not an agricultural pursuit.
  - 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. The Town of Barre is a right to farm community, and over 25% of our land base will be occupied by industrial renewable energy projects.
- Issue 4 (related to Chapter 13): Rural Communities
  - 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 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 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.
  - 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. Currently approved projects that are waiting on supplies, for significant periods of time; have already cleared the land and now are waiting to be able to start construction causing a true lose lose scenario. Where we are adding to the climate problem, under the guise of trying to reduce our carbon footprint.
- Issue 8 (related to Chapter 13): Substantial risks In Appendix G
  - 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. However, the appendices gives an estimate of 2.7 trillion dollars in addition to the

\$300 billion. This makes the economic cost for the state three trillion dollars over the 28 years of the plan. How will this be financed? 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. Three trillion dollars is an astounding amount of money to commit to this risky plan, as a NYS resident, landowner and parent, this is not a burden that I would like placed on my family or our children..