

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 15 - Agriculture & Forestry

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 15 of the Draft Scoping Plan.

Sincerely,

/s/

Kate Kremer
Vice President
Save Ontario Shores, Inc.

Chapter 15 - Agriculture and Forestry

Large-scale solar

The Draft Scoping Plan (the Plan) includes 60-65 GW of solar which will require large-scale solar on agricultural land that is already less available due to other causes. An estimated 225,000 to 315,000 acres will be required to meet this goal in the coming years. Climate change is likely to increase the need for viable agricultural land.

The Plan is not clear about how much of the 60-65 GW of solar will be from large-scale industrial solar projects. That is because many of the charts do not distinguish between distributed solar (generally located close to where it is used and often found on rooftops and businesses) and industrial solar. However, the total number of 60-65 GW for all types of solar by 2050 is staggering.

There is a statewide goal of 10 GW of distributed solar by 2030. If the State achieves 20 GW distributed solar by 2050, that leaves 45 GW of industrial solar, at 5-7 acres per MW requiring 225,000-315,000 acres of land for industrial solar. This equals 350-490 square miles of industrial solar projects. (See https://s30428.pcdn.co/wp-content/uploads/sites/2/2022/01/NY-Smart-Solar-Siting-on-Farmland_FINAL-REPORT_1.31.22.pdf page 10, foot note 2 for solar acres needed per MW.) If each project is 200 MW, then we will need 225 solar projects to meet this goal. One of the largest solar projects in the state is the Cider Solar project proposed in Genesee County. It is a 500 MW industrial solar project that is planned to use about 3000 acres of farmland.

The cheapest location for industrial solar is farmland located near transmission lines. New York lost a quarter million acres of farmland between 2001 and 2016 to development. (See https://farmlandinfo.org/wp-content/uploads/sites/2/2022/01/NY-Smart-Solar-Siting-on-Farmland_FINAL-REPORT_1.31.22.pdf page 8.) This quantity of large-scale solar will double the ongoing loss of agricultural land at a time when climate change is increasing the value of our agricultural region with plenty of water.

There is no effort in the Plan to spread the land-intensive burden of these projects across the state. There is a problematic regional impact as the developers will want land that is easily accessible to transmission lines leading to some counties with many industrial landscapes and a reduced percentage of farmland.

Due to the state Office of Renewable Energy Siting (ORES) “Uniform Standards and Conditions” these counties and the host towns will have almost no local ability to limit the number or size of the projects. The Climate Action Council does not acknowledge the degree to which ORES has limited the participation of local governments and community groups in siting decisions. The “Development Mapping” listed in Chapter 13 on page 162 will be a waste of town resources as developers, particularly land-based industrial wind developers, have financial reasons for siting decisions and little incentive to consider local concerns when planning a large-scale renewables project.

There is a substantial conflict between industrial solar and agriculture that the Plan does not highlight and does not adequately attempt to solve. As farmland becomes scarcer and the need for this land increases with New York's plentiful water supply and warming temperatures, what will happen? It appears that the Climate Council has gone to great lengths to make projections in some areas and ignored others. What are the projections for agricultural needs in New York over the next several decades? What are the projections for land needs associated with migration? Housing? Development? Will the State be willing to eliminate all development of housing or businesses on agricultural land so that there is sufficient land for solar development without decreasing agricultural land precipitously?

Solar panels are not the competition for agriculture. But they are proliferating the fastest and they have the State regulatory system in ORES to ensure that the scale is tilted their favor. The impacts to the State economy and food resources could be grave.

The saying, "if it looks too good to be true it probably is" rings true here. There needs to be a much more careful review of what doubling the agricultural loss over the next decades will mean for New York State. Sacrifices will be made. Let us know what you propose that they be.

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.

Conflict between industrial renewables and forest preservation

The Plan does not address the glaring conflict between the need to preserve (and increase) carbon sequestration by New York's lands and forests, and the clearing of lands and forests for land-based wind and industrial solar projects. Existing permitted projects have cleared thousands of acres of forested land. The new wind and solar projects proposed under this plan will require clearing tens of thousands more.

Chapter 5.3 lists the following strategies (among other items):

1. Electrification in buildings and transportation
2. Zero emissions electricity
3. Maximizing carbon sequestration in New York's lands and forests

(See Chapter 5, page 31)

When we follow the impacts of these above strategies it is clear that they are in conflict:

1. One major component of the plan is to electrify energy use by eliminating natural gas and gasoline. This means that electricity will provide the energy to heat homes, operate vehicles, and run all the appliances now operated by gas. These efforts will double the electricity needs of New York State in the next decades.
2. The second component of the plan is to have 75% of this electricity generated by wind and solar projects. Some of the wind projects will be offshore and some of the solar

projects will be on rooftops. However, the increase in electricity use is going to be so great that the plan relies for much of its energy on land intensive wind and solar projects.

3. An additional strategy is to stabilize and increase forested land in the State to provide carbon storage in the land and trees. Yet the high need for land for renewable energy generation *will conflict with this effort. The already permitted Alle-Catt Wind project will result in the deforestation of 1500 acres.* And there are many projects that have been permitted in recent years that are adding to this amount. And yet the Plan recommends generation that will require two hundred fifty 200 MW solar and fifty 200 MW wind projects or a larger number of smaller projects. This will create an enormous pressure for land, including a need to clearcut forested land.

The Plan fails to admit or manage the conflict between setting aside forests for carbon storage and clearcutting for the transmission lines, utility scale wind and solar projects and their associated roads and transmission lines.

By including these three goals – 1) to electrify everything 2) to increase large scale on-shore wind and solar and 3) to increase carbon storage in land and trees, and by not acknowledging the extent to which they conflict with each other, the Plan is not being honest or transparent. By not stating the problems we hamper our ability to solve them and we remove the opportunity for citizens to offer ideas and alternatives.

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.