

## Response to APA's Proposed "Policy on Renewable Energy..."

As a life-long Adirondack resident, longtime environmental advocate, and national energy expert, here are my brief responses to the [APA position paper](#) regarding renewable energy (dated 11-9-18). I'd be glad to elaborate on any of the following.

1) *"Wise use of energy resources and development of renewable energy resources offer an opportunity at a state and Park level to contribute to the reduction of global atmospheric carbon levels and climate change."*

**Response:** Unfortunately this is little more than virtue signaling. If the Adirondack Park had a thousand industrial wind turbines (or a hundred solar projects) it would not reduce global atmospheric temperatures by one millionth of one degree C.

2) *"At the state and Park level, we are committed to continue making investments in renewable energy to support millions of jobs..."*

**Response:** This is a subtle change in tactics from the prior assertion. Are we doing renewable energy for climate change or jobs? Regarding the employment assertion, please peruse through this [list](#) of studies and articles that debunk green job claims. Also consider this [insight](#) from an energy expert attorney:

"There is nothing – no program, no hobby, no vice, no crime – that does not 'create jobs.' Tsunamis, computer viruses, and shooting convenience store clerks all 'create jobs.' So a jobs claim misses the point... Since it applies to all, it is an argument in favor of none... Instead of making a case on the merits, it is an admission that the claimants have no good arguments."

3) *"At the state and Park level, we are committed to continue making investments in renewable energy ...to reduce dependence on fossil fuels..."*

**Response:** This is misleading, as industrial wind energy (the primary renewable in NYS) is inextricably **dependent on fossil fuels** – from the mining of materials used in turbines, the fabrication of steel, the delivery of materials, the assembly of components, the excavation of the turbine base, the manufacture of concrete, the delivery of concrete and rebar, *and* the operation of the turbine (as gas is typically used to augment its unrelenting and unpredictable intermittency). Contrary to marketing claims, wind energy (and solar) assure a *continued* reliance on fossil fuels.

4) *"At the state and Park level, we are committed to continue making investments in renewable energy... to maintain public health..."*

**Response:** Wind energy guarantees prolonged dependence on fossil fuels, so any health hazard you attribute to fossil fuels will be continued. Further, wind energy introduces its own set of *additional* health hazards that should be acknowledged. Here is a [sample list](#) of studies from independent experts explaining some of those.

5) *“At the state and Park level, we are committed to continue making investments in renewable energy... and to protect our environment, especially clean water and clean air...”*

**Response:** Wind energy assures a continued dependence on fossil fuels, so any environmental detriments you assign to fossil fuels will be perpetuated. Further, wind energy introduces its own set of *extensive* environmental liabilities – ranging from major wildlife impacts to severe hydrogeological consequences. (See [“Environmental Overviews”](#) and [“Wildlife and Domestic Animal Takings”](#) to a [Vermont hydro-geological study](#) for sample reports from independent experts explaining some of those.) These realities should be publicly acknowledged.

6) *“Current and future development in the Park must be viewed as having a cumulative effect on the quality of Park resources and on the need for reliable and affordable energy supplies.”*

**Response:** Wind and solar energy are *inherently* unreliable. Additionally, when its true costs are allocated, wind energy is 4-5 times the ratepayer cost of conventional electrical energy sources. Solar is worse. (Here is a [sample study](#).) As such wind and solar are the *opposite* of the APA’s stated objective in their energy policy.

7) *“The APA has a responsibility to address important existing and emerging local and regional issues such as renewable energy.”*

**Response:** This is exactly right. The APA should distance itself from *political* positions on energy matters (e.g. those listed on page 2 of the APA position paper). Instead the APA should restrict itself to **science based** positions that focus on protecting the incomparable character of the Adirondack Park.

8) *“The policy is intended to ensure that the APA: ...Protects and enhances Park resources while recognizing that renewable energy production and energy conservation is critical to viable, sustainable human communities within the Park and in a state and global context.”*

**Response:** Renewable energy production is absolutely NOT “critical to viable, sustainable human communities within the Park” in *any* context. These type of specious claims undermine the credibility of the APA’s energy document.

9) *“The APA encourages the development of alternative and renewable energy sources while recognizing the need to balance protection of natural, scenic, aesthetic, ecological, wildlife, historic, recreational, and open space resources of the Park.”*

**Response:** These two positions are diametrically opposed. The APA’s responsibility is to promote the later. For some of the reasons cited in this response, any consequential support of renewable energy sources will be to the detriment of APA’s statutory obligations.

10) *“The APA will provide leadership and participation in State-sponsored initiatives and programs to promote renewable energy production... in the Adirondack Park.”*

**Response:** That is outside the scope of the APA’s charter, and anathema to its reason for existence: “to protect the natural, scenic, aesthetic, ecological, wildlife, historic, recreational, and open space resources of the Park.”

11) “The APA will assess need, siting, and other considerations when reviewing applications for: new or expanded energy generating facilities, including residential solar, residential wind; alternative power generating sources; and new or relocated energy transmission or distribution systems,.” —> {note typo at end of sentence}

**Response:** It’s good that this statement does **not** include industrial wind or solar. That said, the obvious conclusion is that if the APA uncritically endorses all of the political positions in their renewable energy paper, there will be no legitimate argument for not subsequently adding industrial wind or solar energy to the Park.

12) It was quite surprising (and telling) that the proposed APA energy policy did not include the word “Science” even once. This omission is the same fundamental problem that our NYS energy policies (e.g. the [CES](#)) have. This is the proper relationship:

- a) Science exists to give us answers to our technical problems.
- b) As such, our energy policies should be based on genuine Science (i.e. *not* [pseudo science](#), *not* [junk science](#), *not* [political science](#), etc.).

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Too much of the renewable energy conversation is currently controlled by special-interest lobbyists. This results in wildly speculative claims, one-sided characterizations of our options (and their consequences), and little or no *real* Science.

The more scientists study renewables, the more liabilities are uncovered. In addition to the issues mentioned above: **a)** wind energy may produce more CO<sub>2</sub> than gas by itself (e.g. see [here](#), [here](#) and [here](#)), **b)** wind energy may make climate change worse (e.g. see [here](#) and [here](#)), **c)** biomass [produces more CO<sub>2</sub> than coal](#), **d)** wind energy can adversely affect local meteorology, which can harm eco-systems (e.g. [here](#), [here](#), [here](#), and [here](#)), **e)** there are at least [ten possible local economic liabilities](#) to wind projects, etc., etc.

The bottom line is that renewable energy is palliative political pablum. The objective is to placate well-intended (but technically-challenged) citizens.

The APA *can* take a leadership role here *if* it would fill a statewide void: nowhere in state policies is there an **objective** and **comprehensive** evaluation of our energy options! The APA should go on record advocating that.

If the APA is serious about Climate Change, they should make a public position about their support for nuclear energy — which has *scientifically* been [proven](#) to be the electrical energy option that is the most effective reducer of CO<sub>2</sub>. In that light the APA should go on record that they would be in favor of locating [SMRs](#) in the Park.

Lastly, the APA should get behind a law like what was passed for the mountainous section of North Carolina, thirty five (35) years ago, known as the [Ridge Act](#). The same should apply for the Forest Preserve sections of NYS (the Adirondacks and Catskills).