

Hon. James Costello
Hon. Ashley Moreno
New York State Board on Electric Generation Siting and the Environment,
New York State Department of Public Service
Empire State Plaza, Agency Building 3
Albany, New York 12223

Re: Case Number 17-F-0619

Application of Hecate Energy Greene 1 LLC, Hecate Energy Greene 2 LLC, and Hecate Energy Greene County 3 LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article 10 of the Public Service Law for Construction of a Solar Electric Generating Facility Located in the Town of Coxsackie, Greene County

October 5, 2020

Dear Hon. Costello and Hon. Moreno:

My name is Zachary Wellstood. I was born and raised in Coxsackie; my family lives in Coxsackie; my family also owns and operates a small business in Coxsackie. I am currently a second-year PhD student. I am abundantly in support of renewable energy and a 'Green New Deal' as stepping-stones to a more ethical, equitable, and sustainable future for us all. Climate change is a real result of human activity.

I am also 26, which means that I am a future caretaker of our community and a member of the rising generation to whom the problems of the past, present, and near future are being passed down. Any unforeseen consequences over the 25+ year lifespan of Hecate's proposed project will be my generation's responsibility to deal with.

I oppose the current Article 10 proposal on the following grounds:

- » I oppose Hecate's business practices: by centering their business model on first acquiring land privately from landowners, they have pitted those who stand to gain from land leases against community members with genuine and valid concerns for their home and its well-being. Hecate has fractured and strained personal relationships between community members in a very small town. This is socially irresponsible and unethical behavior, and shows from the very beginning that this company stands outside of our community and does not have our community's best interests at heart.
- » I oppose the extent of proposed solar development in Coxsackie without sufficient analysis of its cumulative effects. Hecate's proposal is one of seven in Coxsackie. As far as

I can tell, there is *no* long-term study of the *cumulative* effects of these developments on our environment, community, or economy. Research that does exist casts doubt on Hecate's claims about the impact of solar; for instance, with respect to property values, Gaur and Lang (2020) find:

'Our preferred model suggests that property values in the treatment group **decline by 1.7%** (\$5,751) on average compared to those in the control group after the construction of a nearby solar installation, all else equal. This translates to an annual willingness to pay of \$279 per household to avoid disamenities associated with proximity to the installations. However, this average effect obscures heterogeneity. We find substantially larger negative effects for properties within 0.1 miles and properties surrounding solar sites built on farm and forest lands in non-rural areas.' (Gaur & Lang 2020:18, emphasis mine)

- » I oppose the proposal because it is unclear to me **why residential land and active farmland in the center of town are the preferable choice** for this project. I would like to reference the EPA's RE-Powering America's Land initiative (<https://www.epa.gov/re-powering>) to reclaim brownfields, toxic waste sites, and decommissioned industrial property. So far as I know, Hecate has not produced any explicit arguments against reclaiming waste sites, yet RE-Powering America's Mapper lists 4,498 potential sites available for reclamation in NY (<https://geopub.epa.gov/repoweringApp/>).

Why is Hecate proposing to build *new* industrial sites on agricultural and residential land, when **we should instead focus on repurposing existing sites and investing in rooftop solar for home and business owners?** As stated by Gaur and Lang (2020:2), 'solar arrays use significant amounts of land (about 5 acres per MW of capacity), and may create local land use disamenities.' The logic of consuming enormous tracts of arable and residential land in the name of 'sustainability' is akin to cutting off our arms so that we can run faster because we weigh less.

I have the impression that Hecate (and other companies) have chosen Coxsackie because of cheap land for high payoff: According to the 2010 Census and 2020 estimates (<https://www.census.gov/quickfacts/greenecountynewyork>) Greene County has a negative growth rate over the last 10 years, 13% of the county lives below the poverty line (above the national average), the per-capita mean income is ~\$27,000 (below the state and national averages), and there is a steadily aging population (40%+ will be older than 55 by 2030 — https://www.hudsonvalley360.com/news/greenecounty/ny-ranks-no-1-in-population-decline/article_da1303a4-2586-59e7-9079-8f9128fe3825.html).

In light of these statistics, it is clear that Greene County (including Coxsackie) represents **a county under economic distress**, and the choice of Hecate and other solar companies to propose 2,500-3,500 acres of solar plants in Coxsackie can be described as **no less than predatory**. According to Hecate, Hecate's estimated contribution to Coxsackie is ~\$128,000 per year for ~35 years which amounts to ~\$4.48 million total. By contrast, Hecate's estimated revenue is \$22,000,000 per year (\$150 per MW x 50 MW x 8 hours x 365 days; N. Harm, p.c.). Over 35 years, that amounts to ~\$770,000,000 of revenue. Let's put that into perspective: 4.48 million seconds is equivalent to **51 days**; 770 million seconds is equivalent to **24 years** — that is how big a discrepancy there is between Hecate's potential revenue and their proposed contribution to Coxsackie. Hecate's contribution to Coxsackie over ~35 years is approximately **0.5% of their total estimated revenue**. The Coxsackie-Athens school budget alone is \$33.2 million this year. It doesn't add up.

Hecate's contribution of \$128,000 per year is only symbolic, to make us feel like we benefit somehow, and at what expense? Coxsackie takes on the environmental risk of Hecate's project. Coxsackie loses arable land. Coxsackie loses viewshed. Coxsackie's property values drop. And so on. Our homes are affected directly, and all of this just for \$128,000 per year?

Is there *no way* that Coxsackie can generate \$128,000 per year in an equitable way by investing in **local infrastructure, local business, education, arts, continuing to develop tourism, and responsible renewables such as rooftop solar for homeowners and local businesses**? Hecate's solar plant offers only 3-5 long term jobs (<https://www.greenecountysolar.info/faqs/>), and construction of the facility would likely draw on out-of-county or out-of-state companies (Kowalski 2020).

Leasing cheap land from economically depressed rural communities to turn an exorbitant profit appears to be part of Hecate's *modus operandi*, see Kowalski's (2020) article in *Energy Network News* for the complexities of a project of theirs targeting a similar community in rural Ohio. **Construction of industrial-scale renewable power plants in struggling rural communities exploits and perpetuates existing socioeconomic and class inequalities, while growing the wealth gap which divides us already.**

'The politics of renewable energy can be seen as left versus right. But when it comes to siting large renewable-energy projects, **the divide is increasingly about rich versus poor**. "Wind developers don't target the tony communities, like near Hillary Clinton's house in Chappaqua, or Westchester County," says Joni Riggle, a resident of Chautauqua County, who opposes the Cassadaga project. "The people who live in those places have

the financial clout to fight Big Wind.” (Bryce 2020)

That is why Hecate and its competitors are descending upon Coxsackie right now, and it is fundamentally unjust.

- » On the basis of Princeton Hydro’s Sept. 24th correspondence, I oppose Hecate’s proposed project due to its potential environmental impact on local ecology and on Sleepy Hollow Lake. Princeton Hydro’s report states:

‘In a best case scenario these [best management practices] would function together, almost as a quasi-treatment train to ensure that there are no downstream impacts to Sleepy Hollow Lake.’ (p11)

This report suggests that even in complying with additional preventative measures, there is at best no guarantee whether there will be downstream impacts on Sleepy Hollow Lake and the surrounding environment. The consequences remain unknowable (see especially pp. 9-12).

- » I object to the purported use of herbicides as described in the Princeton Hydro report: ‘The primary control will be through the use of herbicides glyphosate and triclopyr (under various brand names) including spraying, girdling, and injection. Hand pulling may be used in limited cases. Pesticide application regulations are cited, but not otherwise explained,’ (p.9). This seems to stand in direct contradiction to the information on Hecate’s website which reads: ‘Vegetation management will primarily be done with periodic mowing and trimming. Little or no chemical vegetation control is planned. If any is used, it will be far less than farms or golf courses typically use.’ Such contradictory information is a red flag, and **it is not the first time Hecate has given conflicting information** about their land management practices (for instance, saying that they will plant pollinator-friendly undergrowth, but then saying they will mow the undergrowth). Further, if herbicides are used under various brand names, how can we be sure that the chosen brands do not contain other active (damaging) ingredients as well? Who holds Hecate accountable for this long-term?
- » I further object because it is a well-known fact that the quarries and mines around the proposed developments have been central to the cultural heritage and history of indigenous Algonquian peoples for 10-12,000 years (Parker 1925). The redaction of Hecate’s archeological report submitted to the NYS Department of Parks, Recreation and Historical Service obscures whether development of this area will inhibit access to, threaten, or destroy these tangible relics of local culture and history.

- » Approving Hecate's project in just a few hasty years is irresponsible when the consequences will last 25+ years and impact ~17,000 households and 2,500-3,500 acres. I believe that it is unethical for the state to supersede the county in making such impactful choices. There is no one who knows the land like the people who call that land *home*. It is unjust and unreasonable to fast-track international, multi-million-dollar companies for significant development of long-term projects like Hecate's. Here I would like to quote Smith's (2018) article about a related conflict between solar companies and the rights of Native Americans:

'For solar energy to be successful at the scale required by climate change mitigation, solar facilities must be harmonized with the ecosystem, agriculture, and human needs. If local communities are excluded, and knock-on effects are overlooked, **the benefits of renewable energy could be outweighed by negative consequences**. But if innovative strategies and inclusive approaches continue to gain momentum, the future of solar energy will be bright.' (Smith 2018, emphasis mine)

I believe that the responsible way forward for true environmental and climate justice *and* empowerment of rural communities is to involve the rural communities in renewable utility projects from the very beginning. Developers and the state should **actively survey and interview the whole community** (Davis 2016) and **discuss the community's wants and needs** *before* lands are secured and proposals are written; **decision making should be collaborative from the start to the end**.

If local communities are foregrounded and local voices are given due respect, rather than nominal participation through ad hoc Siting Board representation, our local communities can thrive, and **the effect of community-first renewable development will be inherited from the county by the state and the nation**.

'There are other solutions to prevent global warming and replacing fossil fuels through renewable energy, namely residential solar installment as an avenue towards affordable solar energy. Millions of homes around the world have roofs staring into the sky waiting for a useful purpose. **Solar installation on individual homes can provide the same result as solar power plants - clean, renewable energy - but using space already available**. Implementation of new technology to modernize the electrical grid and create decentralized, distributed electricity generation is already underway to take advantage of this type of individualized solar [. . .] **Each action to conserve one species or serve the needs of a minority population helps shape the philosophy of conservation and justice we as a society propagate into the future. Just as the character of a person is judged by his or her daily acts, our society's legacy will be measured by the sum of its individual actions, large or small.**' (Trinastic 2015, emphasis mine)

I offer the following alternative vision to this proposal:

- » Foremost, land-greedy industrial solar plants **should not be built on residential and agricultural land**; instead, Hecate should focus on the reclamation of brownfields, waste sites, and decommissioned industrial properties, in the spirit of the EPA's RE-Powering America's Land initiative. In tandem, there should be **significant investment in rooftop solar for individual homeowners and corporate landowners**.
- » Hecate's proposal should be **rejected** due to the reasons outlined above and due to objections raised by other members of our community. Furthermore, **no proposal in Coxsackie should be approved unless all solar plant proposals can be considered together**. These proposed projects will have a significant cumulative effect; if they are approved one by one, independently of one another, we miss the bigger picture of what is at stake and how our community will be affected.
- » I suggest that Coxsackie (and Greene County) commit themselves to New York State's sustainability goals by holding a town hall to discuss **community-owned solar** (Bozuwa 2018, Farrell 2016) as a viable alternative to Hecate's proposed industrial utility. Large-scale industrial development like Hecate's is not in the best interest of our town, environment, or economy, but **community-owned solar can provide equivalent benefits, while retaining local authority and ownership** over the solar project and its outcomes (ibid).
- » In the event that an industrial solar utility is approved on residential/agricultural land without community consent, I believe the utility company should be bound to invest significantly more money into the community than Hecate currently proposes. For example, if Hecate's solar plant is approved against our wishes, I advocate for an agreement which mandates that the company must return at least 50% of the annual proceeds to the community — a certain percentage paid to the county, a certain percentage paid to the town, and a certain percentage to be paid as yearly dividends to each household in the town of Coxsackie. This model could have significant social impact, but again, I **do not** support Hecate's proposal, and as stated above, I advocate instead for (i) the reclamation of existing sites, (ii) investment in individual and corporate rooftop solar and (iii) community-owned solar spearheaded by the town of Coxsackie and Greene County.

Thank you for your attention in this matter,
Zachary Wellstood
zwellstood@gmail.com

References

- Bozuwa, Johanna. 2018. Opportunities for publicly-run energy utilities to revolutionize generation and the grid. *The Next System Project*, accessed 10/2/20.
<https://thenextsystem.org/learn/stories/public-ownership-energy-democracy>
- Bryce, Robert. 2020. In New York and New England, Wind Energy Projects Are “Like Siting Landfills. Nobody Wants Them.” *Real Clear Energy*, accessed 10/2/20.
https://www.realclearenergy.org/articles/2020/06/01/in_new_york_and_new_england_wind_energy_projects_are_like_siting_landfills_nobody_wants_them_494945.html
- Davis, Marion. 2016. Can county-level energy planning give the people a stronger voice? Lessons from Kenya. *Stockholm Environment Institute*. <https://www.sei.org/featured/can-county-level-energy-planning-give-the-people-a-stronger-voice-lessons-from-kenya/>
see also <https://www.sei.org/publications/county-level-energy-planning-brief/>
- Farrell, John. 2016. Report: Beyond Sharing – How Communities Can Take Ownership of Renewable Power. *Institute for Local Self-Reliance*, accessed 10/2/2020.
<https://ilsr.org/report-beyond-sharing/>
- Gaur, Vasundhara and Corey Lang. 2020. Property value impacts of commercial-scale solar energy in Massachusetts and Rhode Island. Submitted to University of Rhode Island Cooperative Extension on September 29, 2020. Accessed at
<https://web.uri.edu/coopext/valuing-siting-options-for-commercial-scale-solar-energy-in-rhode-island/>.
- Kowalski, Kathiann. 2020. Appalachian Ohio solar projects are moving forward, but jobs impact unclear. *Energy News Network*, accessed 9/28/20.
<https://energynews.us/2020/01/09/midwest/appalachian-ohio-solar-projects-are-moving-forward-but-jobs-impact-unclear/>
- Parker, Arthur C. 1925. *The great Algonkin flint mines of Cocksackie*. Rochester, NY: Lewis H. Morgan Chapter.
- Smith, Olivia. 2018. The Dark Side of the Sun: Avoiding Conflict Over Solar Energy’s Land and Water Demands. *NewSecurityBeat.com*, accessed 9/25/20.
<https://www.newsecuritybeat.org/2018/10/dark-side-sun-avoiding-conflict-solar-energys-land-water-demands/>
- Trinastic, Jonathan. 2015. A matter of scale: the cultural and environmental impact of big solar. *Scitable (Nature Education)*, accessed 9/26/20.
https://www.nature.com/scitable/blog/eyes-on-environment/a_matter_of_scale_the/