

ADVOCATES FOR SPRINGFIELD

P. O. Box 25
Springfield Center, New York 13468

December 14, 2006

Bernard Melewski, esq.
Ulasewicz, Melewski & Greenwood, LLP
112 Spring Street, Suite 307
Saratoga Springs, NY 12866

RE: Jordanville Wind Project SDEIS

Dear Mr. Melewski:

Advocates for Springfield has reviewed the Jordanville Wind Project SDEIS and finds it falls short of being a complete response to significant issues raised by the public.

There are inadequate responses to questions raised by the public, inadequate proposed mitigations, and unacceptable plans for additional investigations to be conducted after the SEQR process is finished. We are particularly disheartened by the almost complete lack of concern for residents of Springfield, many of whom we represent.

We also are bothered by the absence of public discussion of this SDEIS. We do not profess to have all the expertise required to adequately understand the material contained in the SDEIS and would have benefited from opportunities to discuss and debate the materials presented by the sponsors and their experts.

The thirty days allowed for responses to the SDEIS were barely enough time to read through the materials, no less try to evaluate what was presented. This short time frame, when combined with the lack of public discussion, puts us and most of the public in a difficult position. For example, we have not yet seen any reactions from state agencies such as DOT, DOH, DEC, and SHPO. All of these agencies have or should have valuable inputs to allow a reasonable assessment of the proposed project by both the lead agency and the public.

It is our opinion that the draft environmental impact statement was inadequate (which was the reason for requiring this supplement), and this SDEIS does not change that opinion. The sponsor should be directed to go back to work and do the task properly.

A list of our major issues:

- The visual impact analysis although expanded, continues to repeat the shortcomings of the original VIA. See our prior comments about methodology.
- The FAA lighting plan has far too many lights. Further, there is no evidence of any communication with the FAA.
- The night lighting VIA lacks credibility. The two simulations show a total of only one visible red blinking light.
- There is no local expert opinion about potential impact on property values, and the new study presented has been improperly interpreted.
- Phasing of the project has been summarily rejected with no real discussion of the costs and benefits.
- Reduction of the overall size of the project has been summarily rejected with no discussion of the costs and benefits.
- Our request for increased setbacks from share municipal borders has received no response. Nor has our request to limit the field of view in which turbines will be visible.
- The alternative of a community-owned wind power plant of greatly reduced scope but not greatly reduced economic benefit to the host towns has not been evaluated.

Many aspects of the project that should be detailed in the DEIS or SDEIS are left unanswered. For example, the decommissioning fund has not been described except in the most general terms. The raptor migration study to be done AFTER the project is built is almost funny (what will the lead agency do if this study concludes that the project has serious problems that cannot be mitigated?). There is absolute silence about impairment of television reception despite the sponsor's own admission that there will be a problem. There is virtual silence about the details of the PILOT agreement although this will be an essential element of the entire project.

The SDEIS includes reference to a real property study by Cushman and Wakefield (2006) that highlights our previously expressed concerns about this project. As we read this study (a full copy of which is not included in the SDEIS), we believe it says quite clearly that wind turbines will have detrimental impacts on property values for those properties that are sited to take advantage of beautiful views. The study calls out "executive" housing, second or retirement homes, and resort/recreational properties as those properties likely to be most affected. Stark and Warren and the surrounding communities (including Springfield) have such properties and the concentration of these properties is increasing. The proposed project is likely to affect our pocketbooks and we ask that the lead agency fulfill its obligations under SEQRA to consider the impacts of this project on neighboring communities.

Please see the attached detailed set of comments for further concerns. This attachment lists some but not all of our previously expressed questions and objections. It also provides a close look at two aspects of the SDEIS – socioeconomic impacts and night lighting.

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Finally, the project sponsor admits that the SDEIS does not purport to be a complete response to all the questions raised by the public. Such responses will be contained in the final environmental impact statement. But at the point that the FEIS is issued, it is too late to react and respond to the sponsor's answers or proposed mitigations. The debate is over and the sponsor has gotten the last word.

We recognize that in most cases, this is an acceptable approach. Most FEIS documents are final answers to actively and thoroughly debated topics. However, in this situation, we believe that the project sponsor has failed to provide a complete DEIS (even after reviewing the supplement) and it is premature to conclude the review process.

Please reject this SDEIS and require that the project sponsor provide more complete information, clear responses to questions raised by the public, and reasonable mitigation suggestions.

Thank you for considering our comments.

Sincerely yours,

Harry Levine
President

cc: Town Supervisor – Warren Richard Jack, Kingdom Road, Jordanville, NY 13361
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Town of Springfield Planning Board