

# ADVOCATES FOR SPRINGFIELD

P. O. Box 25  
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## LIST OF CONCERNS ABOUT JORDANVILLE SDEIS

- Our evaluation of the section addressing socioeconomic issues is attached to this list of concerns as Exhibit A.
- Our evaluation of the section addressing night lighting is attached to this list of concerns as Exhibit B.
- Other concerns include the following items:
  1. The project is still proposed as a single phase development. We suggested that the project be constructed in two phases to allow the community to see a smaller first phase in place prior to approving the balance of the plan. This mitigation measure has not been addressed other than the rather curt comment that if the project is not completed in 2007, the sponsor may be forced to increase the overall size to make up for lost economic incentives. Lost profits from a smaller or delayed project are not our concerns. The time to adequately review and consider the project is a necessary part of the development process and the developer should not be threatening more damage to the landscape if its project is not approved immediately.
  2. The SDEIS sets out a schedule that rushes the project through to completion in 2007 (see above). To meet this schedule, the sponsors must conclude the review and approval stages immediately. We believe this pressure creates a need to race through the SEQR process; there simply is no time to properly consider all the project impacts. The project is the largest and most expensive development in the entire region. It should be very carefully considered and not pushed through the review process simply because the sponsor wants to hurry up.
  3. The 230 kV transmission line structures have not yet been selected. Therefore, the public cannot see how these structures will look, and the SDEIS is missing a very important visual part of the project.
  4. Setbacks continue to pose problems. The plan is to comply with the local law requiring 1,200 foot setbacks from nearest residences and 400 feet from boundaries of nearest non-participating landowners. These setback are in accordance with local laws but not sufficient. See our prior comments. For example, a 400 foot setback from a non-participating landowner property line means that such landowner cannot build a house within the first 800 ft of his property. It also means that certain wind rights that belong to such property owner may not be useable after considering the wind turbulence created by the Jordanville project.

5. A construction control plan is not now available but will be produced prior to start of construction. So today we have no means of evaluating construction problems or the completeness of the plan.
6. Financial assurance to accomplish decommissioning is vaguely stated. Reference is made to an interest bearing escrow account “backed by a corporate guarantee.” What does this mean? When will this account be fully funded? What happens if the sponsor fails to fund? Residual value will be “conservatively” valued and used to make up some of the required fund. This valuation leaves a loophole. See additional comments in the Socioeconomic section.
7. The sponsor has met with PSC and DEC to negotiate an acceptable method of complying with SEQR. We wonder what was discussed and when it will be made public.
8. “Minimal” blasting will be required based upon the five test boring results. See Appendix B of the SDEIS for a preliminary blasting plan. Any damage to “receptors” within 1,000 feet of blasting will be the sponsor’s responsibility to repair. But what about wells that run dry due to changes in the subsurface fissures but are outside of this 1,000 foot range? It is interesting to note that the 1,000 foot protection area does not even reach to the setback of the current local law.
9. According to the three professionals who rated visual impact, night simulations were rated as “perceived negatively” by affected residents. Yet there is no effective or adequate mitigation being proposed. See additional comments on night lighting.
10. To mitigate visual impact on historic resources, the sponsor proposes to fund restoration of an historic building or the upkeep of an historic cemetery. This seems like a very minor effort to mitigate.
11. The SDEIS states that project opponents tend to be bothered by any and all noise. Thus there is no way to satisfy them on the noise issue. The sponsor will “mitigate” by conducting tests to address complaints and will remediate any noise exceeding town law standards. The starting premise that only project opponents will be bothered by the noise and they cannot be satisfied is insulting and *ad hominem* reasoning at its worst. The proposed mitigation is too limiting and requires more considerate treatment of people who hear the noise more than others to the degree that it intrudes on their daily lives.
12. Offsite road impacts will be presented in the FEIS. No specific traffic plan has been determined yet. This is a good example of inadequate information in the SDEIS. How can the project be evaluated now without such information?
13. The sponsors could not find any publicly available information on the Cherry Valley project proposed by Reunion Energy and therefore could not consider this other project in the SDEIS. The inability to find information is quite remarkable as this other project has been very much in the local press during the past year or more. The SDEIS is simply wrong.

14. The project area has changed significantly. Many non-participating parcels are now interspersed throughout the area. These non-participating lands will be surrounded by turbines and their owners should be protected by the lead agency.
15. Fig 7 Photo rendering of Viewpoint 87 (on Otsego Lake looking toward Sleeping Lion from Clinton's Dam) makes the turbines invisible at normal magnification and hardly visible at 2X. This cannot be what the eye perceives. This example raises once again our previously expressed concerns for the inadequacies of photo simulation. Either this technique is not very accurate or the sponsors are using out-of-date technology.

Fig 8 Viewpoint 99 of fields (from Route 20 looking northwest, in Springfield?). Same result; same problem.

Fig 9 Viewpoint 129 on the lake at Kingfisher tower. Same result; same problem.

15. Fig 11 Road improvements. This figure shows the construction route but limited to within the project area. Where is the rest of the off site routing?

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