



Empowering Communities, Advocating Solutions.

## MEMORANDUM OF OPPOSITION

### *GREAT LAKES WIND MORATORIUM*

**S.1223 - BORRELLO**

**A.3650 - MANKTELOW**

**Description:** Enacts an indefinite moratorium on Great Lakes Wind power that can only be lifted by the legislature.

#### **Justification**

The Climate Leadership and Community Protection Act (CLCPA) requires NYS to achieve 70% renewable energy by 2030, 9,000MW of offshore wind by 2035, 100% carbon-free electricity by 2040, and net-zero greenhouse gas emissions by 2050. As part of the White Paper to implement the CLCPA, NYSERDA proposed to conduct a feasibility study to explore the potential for offshore wind in the Great Lakes to help meet CLCPA goals. The feasibility study was completed in late 2022 and NYSERDA determined that Great Lakes Wind is not an option that the state will pursue at this time.

However, NYSERDA indicated that Great Lakes Wind may become a feasible contributor to New York State's goals in the future as the State advances toward its mid-century goals. Additional environmental studies, upgrades to the state's transmission system, experience gained from pilot projects elsewhere, and a host of other factors could change the landscape for Great Lakes Wind, making it a feasible option in the future for New York State.

This legislation would enact an indefinite ban on Great Lakes Wind in New York State by an act of the legislature. Rather than utilizing the latest scientific studies and state agency expertise to determine if Great Lakes Wind becomes a feasible option in the future, this legislation would only allow the legislature to lift the moratorium. New York should not construct roadblocks—which are not based on sound science—to stand in the way of achieving our climate and renewable energy goals in the future. It should also be noted that if the state does pursue Great Lakes Wind in the future, it will require site-specific environmental review for proposed projects (conducted with numerous state and federal agencies) that will be substantive and will allow for a meaningful discussion on potential benefits, concerns, and mitigation options.

Fighting climate change is essential to protecting the health of our Great Lakes for current and future generations. Offshore wind in the Great Lakes, which is sited responsibly, developed with rigorous environmental review, and respects the health of the Great Lakes ecosystem and its many uses, should remain a future option to fight climate change and meet the state's long term climate goals.

**CITIZENS CAMPAIGN FOR THE ENVIRONMENT OPPOSES**  
**S.1223/A.3650—Great Lakes Wind Moratorium**

*CCE is a 120,000-member non-profit, non-partisan advocacy organization that works to empower communities and advocate solutions that protect public health and the natural environment*

May 8, 2023