



July 12, 2021

Via Electronic Mail

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Gov. Cuomo:

We understand that the state is currently selecting projects that will be the recipients of Tier 4 renewable energy credits. This program is designed to incentivize the development of clean electric power that can be transmitted to New York City. We recognize that is an important step in the State's transition to renewable energy, but believe it should be taken in a manner that minimizes environmental impacts, in New York and elsewhere. Although the first of these proposals was the Champlain Hudson Power Express ("CHPE") cable, there are now six other bidders proposing solutions, each of which promises to have considerably less impact. When considering which bidder to select, we urge the state to take full account of the differing impacts, both on the Hudson River and on the impacts of the type of generation utilized. Finally, we feel it is important that the process is not only fair, but is also seen to be fair, so that there is no suggestion of favoritism.

While the Hudson River is in most ways healthier today than 50 years ago, its ecosystem is still fragile from hundreds of years of degradation, including the slaughter of billions of fish, eggs and larvae every year for decades from the use of river water for fossil fuel and nuclear electric generation. It should not be subject to unnecessary impacts as we move toward reliance on renewable energy sources. Using the river as a conduit for electrical cables could mobilize PCBs and other contaminants during construction, posing a particular concern for drinking water supplies that are reliant on river water. In addition, during operation, such cables have sparked concerns in the shipping industry that emergency anchoring could snag a cable. Finally, there is a growing body of evidence that magnetic fields generated by in-water cables will inhibit the ability of fish to navigate. For these reasons, the ideal cable is one that minimizes the length buried in the Hudson.

In addition, cables that transmit in-state wind or solar power have the lowest impact on the environment and have the major advantage that they generate jobs and investment upstate.

As you may be aware, we oppose the CHPE cable in part because it would supply Canadian hydropower, which is inherently damaging to rivers, has had major negative impacts on indigenous peoples, and is far more carbon intensive than either wind or solar. In short, well-sited wind and solar are both renewable and low impact, whereas hydropower may not be renewable and has higher impact.

Finally, it is important that this award is not tainted by any appearance of favoritism or that lobbying is the reason for a particular bid winning. We trust that the administration will clearly explain the reasons for selecting the winning bidder and that environmental factors will be heavily weighted in the selection process.

Regards,



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