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AIR AND WILDLANDS

August 27, 2020

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Ariel Lynch
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
(Via *electronic Submission*)

RE: Ticonderoga Solar Project, P2020-0008

Dear Ms. Lynch,

On behalf of the Adirondack Council, I would like to thank you for the opportunity to provide comments on the *Ticonderoga Solar Project, P2020-0008*. In accordance with our 2019 Board approved principles on Adirondack Park Renewable Energy Development (see attachment), the Council supports science-based, appropriately sited and designed renewable energy projects that are consistent with the scale of the region and critical to accelerating the North Country and New York State's transition to a carbon-free future. The Adirondack Council believes this project meets those requirements and we support the proposed 36-acre solar project in the Town of Ticonderoga.

The Climate Leadership and Community Protection Act has set important carbon-reducing goals for New York State, including the goal to produce 6,000 MW of solar by 2025. Harnessing natural resources like sun energy to accelerate the transition to a cleaner and fossil fuel free future is integral to protecting the Adirondack Park's natural and human communities. The Council sees projects like the Ticonderoga solar project as important steps on the path towards a cleaner future, rooted in natural landscape protection, the propagation of renewable energy sources and the adoption of energy conservation practices.

In reviewing the proposed solar development, there are many important elements of the project that should be noted, including the proximity of the site to existing utility infrastructure and to the community center. These elements are integral to protecting important Adirondack open space qualities while promoting renewable energy generation. Balancing the need for developing critical renewable energy infrastructure while preserving productive and viable agricultural lands needs careful thought and a clear understanding of the impacts one will have on the other.

The same is true for the habitat impacts that will come at a cost with these types of renewable energy projects. Given the presence of some wetlands on



the property, which will be bisected by a proposed access road, the Council encourages that this important habitat to be protected to the greatest extent possible. As outlined in our Renewable Energy Development policy, wetland impacts and development should be avoided or mitigated as a condition of the project terms. This would include addressing issues such as increased run off from the impervious surfaces during construction, reconstruction of wetlands on other areas of the property or in close proximity to the property, and reducing stormwater impacts from the arrays themselves. In addition, per our policy, projects should adhere to best practices, such as using pollinator-friendly plantings around the solar panels to support local pollinator populations.

In closing, the Council supports this solar project in its current configuration and believes it is consistent with our Adirondack Park Renewable Energy Development policy. Thank you for reviewing our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jackie Bowen", written in a cursive style.

Jackie Bowen
Conservation Associate



Board Approved Principles for Adirondack Park Renewable Energy Development

February 7, 2019

Background:

Global climate change poses real, long-term threats to the Adirondack Park's natural and human communities and the world. Global action to aggressively address this threat starts at the local and landscape level. As the largest park in the continental US, the Adirondack Park can be a model for a large public/private conservation landscape combating climate change. In the Adirondacks this equals protection of nature, more carbon sequestration, more clean energy, reduced greenhouse gas emissions, more resilient communities, and stabilized energy production and supply infrastructure.

Climate change is the defining environmental threat for our generation, impacting wilderness, clean water, clean air, rare wildlife, natural communities, natural processes, people and the economy. It is a priority for the Adirondack Council to preserve the Adirondack Park and do more to combat climate change.

Protected, undisturbed forestlands serve a vital role in mitigating climate change by sequestering human-generated greenhouse gases (GHG). Scientific studies show that land stewardship is the most effective method to capture GHG. With millions of acres of forest lands throughout the Park, people across New York State derive significant benefits from the health and vibrancy of the Park's landscape.

Natural landscapes, and the Adirondacks in particular, play a vital role in mitigating climate change. As one of the largest unfragmented forested landscapes in the nation, the Park is able to absorb more CO₂ than its local human communities produce and is functionally carbon negative. This is an enormous benefit and should serve an integral role in carbon reduction as NY strives to have carbon-zero power production by 2040. Given its ability to mitigate the impacts of climate change, protection of the Adirondack Park Forest Preserve and other undeveloped lands within the Blue Line, serves all of New York and should be celebrated as a central component of a robust climate mitigation effort.

The path towards a cleaner future is rooted in natural landscape protection, the propagation of renewable energy sources, and the adoption of energy conservation practices. The Adirondack Council will advocate for renewable energy projects and policies that protect the Park and its communities. Efforts will focus on engaging community, municipal, and governmental decision makers on Adirondack appropriate renewable energy solutions, facilitating innovation and technology that fits the scale and scope of the Park, and leading on understanding how to mitigate climate change at a regional scale. In this capacity, the Park will serve as a global model for supporting accelerated renewable energy development while preserving critical natural resources across a conserved landscape.

The Adirondack Council will support renewable energy development policies or projects that:

1. **Defend Forever Wild (Article XIV) and Intensify Carbon Sequestration Efforts:** Keep growing trees and sequestering more carbon and biomass on the Forest Preserve and private forest lands. *Do not weaken “Forever Wild” protections.* Forests within the Adirondack region play a significant role in carbon sequestration at a globally significant scale. Projects should not erode the essential value the Park’s public and private forests play in mitigating climate change.
2. **Maximize Energy Conservation:** Reduce energy consumption and institutionalize conservation practices that reduce local and regional energy demand.
3. **Ensure Decisions are Science-Based:** Use the best available science to determine the most appropriate design, siting, placement and scale of renewable projects to minimize and mitigate impacts to water, wildlife, vegetation, habitat, soil and other natural resources.
4. **Support Renewable Energy:** Promote localized solar, hydro, small scale wind generation to reduce emissions. Maximize underground energy transmission infrastructure. Support a climate smart, energy smart, resilient and clean green energy Park. Encourage renewable energy development, with partners, through comprehensive regional, local and state planning and zoning to accelerate developments in a manner consistent with other land use goals.
5. **Use Careful Siting and Design to Minimize (but accept some) Visual and Other Impacts:** The aesthetic value and beauty of the Adirondack landscape is one of the Park’s great treasures. Potential projects should consider the following elements to minimize visual and other impacts:
 - a. Placement matters. Use best available science to site and design renewable energy projects. Ensure that individual and net cumulative visual impact of renewable energy development and associated infrastructure on open space, scenic vistas, prime farmland and working forests are minimized and mitigated to the extent practical to protect ecological integrity, view sheds and the Park’s wild forest character.
 - b. Avoid wetlands, impacts to rare wildlife and critical wildlife habitat and migration corridors, ridgelines, steep slopes and sensitive geological and hydrogeological sites.
 - c. Protect wildlife corridors. As the impacts of climate change continue to worsen over time, altering the physical landscapes and ecosystems of wildlife, the Adirondack Park’s large open spaces on both public and private lands will play ecologically significant roles in creating wildlife corridors as they migrate to survive. Projects should assess and seek to minimize to the (maximum) extent possible impacts to existing and projected wildlife habitat and migratory corridors.
 - d. Scale matters. Renewable energy projects need to be North Country and community centric to support Adirondack regional energy needs. Prioritize local and distributed energy resources over bulk power, but support more renewable energy development and a net export of green power as long as other principles are met.
 - e. Individual projects should to the extent possible be located in or near communities on disturbed, developed, “infill” or industrial lands.
 - f. Co-location, such as solar on rooftops, should be the priority. Projects should adhere to best practices (such as using pollinator-friendly plantings to support bees around solar panels or accounting for bird migrations for wind turbines).

- g. Transmission infrastructure. Project review should include an assessment of how energy will be connected to the grid. Using existing ROWs and burying power lines should be preferred over new right of ways for aesthetic reasons.
 - h. Decommissioning. Plans and funding should be available for eventual decommissioning, replacement with new technology, and/or site restoration.
6. **Promote and Generate Community Benefits:** Renewable energy projects can and should deliver local economic benefits to Park residents and communities. Projects should help keep local energy costs low. Efforts should foster a ‘right-to-renewables’ mentality to encourage community buy-in on the localized use and siting of renewable energy, such as community solar projects, and seek to aid in connecting communities with state incentives and grant opportunities to help catalyze renewable projects throughout the Park. Promote community engagement and participation in state-led renewable energy projects, investments and initiatives.
 7. **Use Best Available Technologies:** Mitigate environmental impacts with best available technologies. Learn from other regions and recognize that technology will continue to evolve. Build in flexibility to accommodate advances in science and other changes.
 8. **Foster Public Engagement, Transparency and Education in the Review Process:** Encourage stakeholder and community participation in clean energy and climate smart programs; support public education on renewable energy benefits; foster trans-jurisdictional information sharing; and, as technologies change, commit to upgrading standards and best practices. In addition, seek ways to foster the engagement of people of all ages in renewable energy projects and advocacy efforts, as climate change will continue to be the prominent issue of future generations.
 9. **Strengthen Public Knowledge on Renewable Energy:** Support and engage on educational efforts for a wide audience, particularly for stakeholders and policymakers. Education should be used to clarify renewable energy technologies, their benefits (air and water quality, economics, etc.), distribution (community generated distribution), and more.
 10. **In Whole, Support a Climate Smart, Sustainable, Protected Adirondack Park:** In sum, individual projects and the cumulative impact of multiple projects should support and advance the protection of the ecological integrity of the Adirondacks. Projects should be a net positive contributor to the Park being a model for how a globally special public-private conservation landscape does its share in the global effort to combat climate change while protecting the unique nature of the Park for the future.

Each project, policy or proposal will have to be reviewed on a case-by-case basis.