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March 1, 2021

Matt Brown
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Re: Ticonderoga Solar Generation Facility Project, P2020-0277

Dear Matt,

On behalf of the Adirondack Council, I would like to thank you for the opportunity to provide comments on the *Ticonderoga Solar Generation Facility Project, P2020-0277*. The Adirondack Council conceptually supports this five megawatt solar project on Moderate Intensity Use lands because it aligns with the Council's *Board Approved Principles for Adirondack Park Renewable Energy Development* (see attached) and the goals of the Climate Leadership and Community Protection Act (CLCPA).

Climate change is the defining environmental threat for our generation. It poses real, long-term dangers to the Adirondack Park's natural and human communities and the world, including impacting wilderness, clean water, clean air, wildlife, natural communities, natural processes, people and the economy. As the largest park in the continental US, the Adirondacks can be a model for a large public-private conservation landscape combating climate change. The path towards a cleaner future is rooted in natural landscape protection and the propagation of renewable energy resources. Transitioning to a cleaner and fossil free future by harnessing renewable natural resources, like solar power, is an essential piece to protecting the Adirondack Park's natural and human communities. Smartly sited renewable energy projects in the Park can and should deliver economic benefits to its residents and communities while protecting the ecological integrity of unfragmented forested landscapes in the Adirondacks.

Although the Council was unable to review the application materials, there are public elements of the project which informed our comments on this solar project. The Council supports the choice of location. The property of the proposed solar project is within a mile of the Town of Ticonderoga, is classified as Moderate Intensity Use, and had been authorized as a commerce park previously. As our Renewable Energy Policy states, individual projects should to the extent possible be located in or near communities on disturbed, developed, "infill", or industrial lands.



The APA should ensure that solar projects are carefully sited to minimize ecological, visual and other impacts for an individual project, while also considering the cumulative impacts of renewable energy projects. In addition, given that the proposed project is located in an agricultural district, a balance must be struck between developing critical renewable energy infrastructure while preserving productive and viable agricultural lands.

According to the APA's Wetland Covertypes Map, wetlands are present and bisect the parcel as a whole (see map attached). As noted in our Renewable Energy Policy, development in wetlands should be avoided. The APA should work with the applicant to protect this important habitat to the greatest extent possible. As a condition of the project terms, wetland impacts and development should be avoided. Additionally, the APA should work with the applicant to assess and minimize to the greatest extent possible any impacts to existing and projected wildlife habitat, adhere to best practices and ensure that plans and funding should be available for eventual decommissioning, replacement with new technology, and/or site restoration. Science-based, careful siting is essential in preserving the ecological integrity, open space qualities and aesthetic values of the Adirondack Park.

In closing, the Council conceptually supports the Pivot Energy's proposed solar generation facility in Ticonderoga. We recognize the need for rapid expansion of renewable energy resource projects as part of New York State's overall efforts to fight climate change. The development of carefully sited solar projects are an opportunity to bring economic benefits to Adirondack communities and decarbonize our state simultaneously. We encourage the APA to assess how individual projects and the cumulative impact of multiple projects located in the Adirondack Park can and should be a part of New York State's effort to combat climate change, while protecting the ecological integrity, open space, agricultural lands and scenic vistas of the Adirondack Park. Thank you for reviewing our comments.

Sincerely,



Charlotte Staats
Conservation Assistant

Attachments:

The Adirondack Council Board Approved Principles for Adirondack Park Renewable Energy Development
Adirondack Park Agency Wetland Covertypes GIS Map on P2020-0277 Location



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.

Legend

Wetland Covertypes

Linear Wetland Covertypes

- Linear Wetland

Wetland Covertype Areas

- AB3 Aquatic Bed Rooted Vascular
- EM1 Emergent Persistent
- FO1 Forested Broad-leaved Deciduous
- FO2 Forested Needle-leaved Deciduous
- FO4 Forested Needle-leaved Evergreen
- FO5 Forested Dead
- OW Open Water
- SB3 Streambed Cobble/Gravel
- SS1 Scrub Shrub Broad-leaf Deciduous
- SS3 Scrub Shrub Broad-leaf Evergreen
- SS4 Scrub Shrub Needle-leaf Evergreen
- SS5 Scrub Shrub Dead
- UB2 Unconsolidated Bottom Sand
- UB3 Unconsolidated Bottom Mud
- US2 Unconsolidated Shore Sand

