



Working to conserve the natural beauty, diverse wildlife habitats, water quality and outdoor recreation opportunities of the 1000 Islands region, for present and future generations.

April 14, 2017

Hon. Kathleen H. Burgess, Secretary
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223-1350

Dear Secretary Burgess,

RE: Case 12-F-0575, Horse Creek Wind Farm Project, Jefferson County, NY

The Thousand Islands Land Trust (TILT) was founded in 1984 by a group of year-round and seasonal residents of the Town of Clayton. The members shared a strong love for the Region, but also the concern that increasing development pressure could lead to the loss of the sensitive habitats, diverse wildlife, water quality and scenic beauty that is so unique to the Thousand Islands and St. Lawrence River Valley. The group was concerned that a balance of land conservation and responsible land development is critical to the preservation of the very foundation that supports our Region's ecological health, economic vitality, and quality of life.

TILT was the first, and is currently the only, land trust to focus exclusively on the conservation, protection, and restoration of the environmental integrity and water quality of the Thousand Islands and St. Lawrence River Valley regions.

Since 1992, TILT and its conservation partners have utilized the New York State Open Space Conservation Plan as the blueprint for guiding our communities' investment in land conservation and habitat restoration. More recently, TILT has been a participating member of the DEC Region 6 Open Space Advisory Committee to provide input for the revision of the 2016 New York State Open Space Conservation Plan. In an effort to advance land conservation and the goals set in the Open Space Conservation Plan, TILT and its partners have protected over 25,000 acres of wildlife habitat, established a network of over 60 miles of recreational trails, and have invested millions in the restoration of both threatened and endangered species. Much of this work has been funded by the State Environmental Protection Fund.

TILT also works with our local communities to enable initiatives that are aimed at combating climate change. Through working with conservation partners and state and federal agencies, our conservation work focuses on protecting lands that have high climate change resilience. And through our restoration work, we focus on establishing and enhancing habitats that act as long-term carbon sinks.

TILT manages preserves, nature trails and conservation easements in all towns stretching from Cape Vincent, Jefferson County, to Morristown, St. Lawrence County. Conserving over 9,200 acres of critical habitat that supports a variety of threatened and endangered species, TILT has a substantial, vested interest in protecting the environmental integrity of the Region.

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TILT also understands that in order to have a true impact on climate change, our communities must continue to seek opportunities that further develop and expand our use of renewable energies, and reduce our dependency on fossil fuels. This is just one of the many reasons TILT joins hundreds of local, regional, and national organizations applauding Governor Cuomo for launching New York's Clean Energy Standard, which directs the Public Service Commission to expand large scale renewable energy with the goal of providing 50 percent of the state's power generation by 2030. In addition, we believe the Governor's environmental and clean energy initiatives will help New York homeowners, businesses and universities invest in clean energy, drive economic growth across the state, and further protect New York's invaluable environment.

With that said, TILT strongly believes that it is incumbent upon our communities and our state to achieve our shared renewable energy goals without adversely impacting our most precious natural resources. The siting of, and development of utility-scale renewable energy facilities and transmission lines should consider the local, potentially adverse impacts.

Currently, the eastern end of Lake Ontario, the Thousand Islands, and the St. Lawrence River Valley regions have been targeted as prime locations for utility-scale wind development, with turbines proposed for the towns of Clayton, Orleans, Lyme, Brownville, Hounsfield, and Cape Vincent. This does not include the numerous projects being proposed in the counties of Lewis, Oswego, Franklin, St. Lawrence, Orleans and Niagara.

The siting of 500-600 foot wind turbines and the development of 150-250 megawatt wind energy generation facilities in eastern Lake Ontario, the Thousand Islands and the St. Lawrence River Valley not only threatens TILT's investments in land conservation, but it is also disconcerting for the following reasons:

- These regions are composed predominately of climate change resistant areas, meaning they are more resilient to climate change and serve as natural strongholds for diversity into the future. (www.conservationgateway.org) The cumulative effects of a single utility-scale wind energy facility, spanning 10,000 plus acres, has the potential to degrade the resiliency of our landscape, further compounding the impacts of climate change.
- Through habitat fragmentation and edge encroachment, these projects threaten the rare natural alvar communities, which are critical for the survival of threatened plant and animal species. In addition, turbine construction has the potential to disrupt ground water course in this karst topography and could result in the degradation of residential well water. Alvars do not exist anywhere else in New York State. In fact, the Chaumont Barrens Preserve is one of the last and finest examples of alvar grasslands in the world, and is a link in the chain of North American alvars forming an arc from Jefferson County through Ontario, and all the way to northern Michigan. (www.nature.org)
- These regions are part of the larger Atlantic Flyway which encompasses some of the hemisphere's most productive ecosystems, including forests, beaches, and coastal wetlands. These ecosystems dominate our landscape. More specifically, eastern Lake Ontario, the Thousand Islands and the St. Lawrence River Valley are a "hot spot" for migrating, breeding and nesting grassland and neotropical bird species. Species like Eastern Meadowlarks, Cerulean Warblers, Bobolink, etc, all NYS Threatened species, could observe high mortality rates as they travel through wind turbine facilities.
- Lake Ontario's eastern end and the south shore form an annual migration corridor for over 40,000 hawks, vultures and eagles utilizing naturally occurring thermals, during one of the largest and most diverse raptor migrations in the country. Turbines located in this area pose a significant threat to these birds, given kill rates and excessive Take Permits. (onondagaaudubon.com)

- Three federally endangered and threatened bat species, also listed in New York, occur in these regions. Utility-scale wind energy generation facilities cause significant mortality for many bat species. Already experiencing great stress and decline due to "white nose syndrome," increased bat kills from turbine impacts will decimate remaining bat populations.
- The Thousand Islands and the St. Lawrence River Valley are in the heart of the Frontenac Arch. The Frontenac Arch is a geological feature that connects the Adirondack Mountains to the Algonquin Park and Canadian Shield, creating an intersection that marks one of the highest levels of biological diversity in North America. (www.frontenacarchbiosphere.ca) Habitat fragmentation and land use changes from wind energy facilities could forever alter the future of this unique landscape.

In addition to the above threats, the necessary environmental studies, impact assessments and comprehensive siting plans have not been conducted. For any comprehensive studies, it is essential that all projects proposed in the Region, including current, proposed and future projects in the Province of Ontario and other Canadian provinces should also be included.

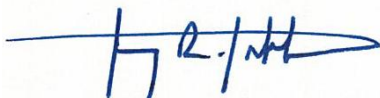
It is projected that if the State were to reach its 2030 goal of generating at least 50 percent of its energy using renewable sources, renewables would likely cover only 1-2 percent of the State's total land mass. Of the 30.2 million acres that comprise the entire State of New York, 302,000 – 604,000 acres would be utilized by either land-based wind turbines, off-shore wind turbines, solar, and/or hydro. With this amount of land mass available to accomplish our clean energy goals, TILT believes that the State has the ability to avoid any/all environmental trade-offs.

While TILT supports the development and expansion of renewable energies, TILT opposes the Horse Creek Wind Farm being proposed by Avangrid Renewables and any/all siting of utility-scale wind energy generation facilities within the viewshed of the St. Lawrence River and its tributaries.

The Thousand Islands Land Trust Board of Trustees recognizes that this letter does not take into consideration other impacts that the proposed Horse Creek Wind Farm would present. Additional areas of impact include, but are not limited to, human health, visual aesthetics, river navigation, property values, land use, military operations, tourism, and local economies.

We believe that the State must clearly define guidelines that will govern responsible siting for such projects. We should collectively consider new clean energy initiatives that will not erode past environmental investments made by the State, including investments made by countless land conservation and environmental organizations to advance New York State's Open Space Conservation Plan

Sincerely,

A handwritten signature in blue ink, appearing to read "JR/Tibbles", with a long horizontal line extending to the right from the end of the signature.

Jake R. Tibbles
Executive Director

References:

<https://www.nature.org/ourinitiatives/regions/northamerica/unitedstates/newyork/places-preserves/central-chaumont-barrens.xml>

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