



Save The River
Upper St. Lawrence **RIVERKEEPER**®



June 14, 2007

Town of Clayton
Attn: Roland Baril
405 Riverside Dr.
Clayton, NY 13624

Re: Comments on the St. Lawrence Wind Draft Environmental Impact Statement

Dear Mr. Baril,

Save The River and Thousand Islands Land Trust respectfully submit the following comments on the Draft Environmental Impact Statement (DEIS) for the Horse Creek Wind project proposed by PPM Energy in the Town of Clayton.

Save The River and the Thousand Islands Land Trust support green energy, including wind turbines, in any community but that they must be properly sited and that appropriate studies must be completed. We are submitting joint comments to highlight our significant concerns about the deficiencies of planning and oversight on this wind energy development proposal.

The Thousand Islands region and St. Lawrence River valley are areas where land and water interconnect and, as a result, are a rich, diverse area for wildlife. Additionally, our area is a key piece of the North Atlantic Flyway, a significant migratory pathway for millions of birds. Several noteworthy bird species have been documented using this region either as nesting habitat, over wintering, or foraging areas. Multiple organizations and agencies have recognized the environmental importance of the area including:

- U.S. Fish and Wildlife Service has identified the Thousand Islands region as one of three focal areas for Strategic Habitat Conservation in Region 5.
- 2006 New York State Open Space Conservation Plan considers the St. Lawrence River islands, shorelines and wetlands a conservation priority
- New York Department of Environmental Conservation has designated the area as a New York State Bird Conservation Area.
- Audubon New York has identified the area as an Important Bird Area.

In light of these important environmental features, Save The River and the Thousand Islands Land Trust are very concerned about the lack of depth and breadth of the

environmental studies included in the DEIS and the overall site review process for this proposed development. Specifically,

- ***Regional Study and County-wide review*** – With large-scale wind development projects underway throughout the St. Lawrence River valley and the North Country, a thorough review of the collective impact of these projects is critical. The impacts and benefits of wind-energy installations are not constrained by political boundaries. The Jefferson County Legislature and Jefferson County Planning Department should be involved in coordinating these projects on a county-wide basis.
- ***Pre-construction Studies*** - Pre-construction evaluation of the facility is critical to fully understand and mitigate potential environmental impacts. Pre-construction studies provide important information needed to site and construct the wind turbines with minimal impact on environmental features. The DEIS currently recommends relying heavily on post-construction mitigation, which is not acceptable.
- ***Rigorous SEQR Review*** - We are very concerned that the State Environmental Quality Review (SEQR) process has not been followed to its fullest extent. The SEQR process requires full review of adverse impacts and alternatives. The DEIS for this project fails to show what the significant adverse environmental impacts might be and it does not contain information necessary to evaluate project alternatives.
- ***Relevant Agency Expertise*** - In light of the national and regional significance of the ecology of this region, agencies with relevant expertise, such as the New York Department of Environmental Conservation, New York Department of State, and U.S. Fish and Wildlife Service, must be an integral part of the decision-making process on any environmental and site review processes.
- ***Long-term bird and wildlife studies*** – The DEIS must include studies of at least three years in duration to account for natural annual variability of bird and wildlife habitat. Currently, the DEIS includes only one year of study and data collection. An expert panel recently convened by the National Research Council, *Environmental Impacts of Wind-Energy Projects* (2007), strongly recommended that all wind energy proposals develop predictive and risk-assessment models of potential, cumulative impacts that include full season, multi-year pre-siting studies, pre-construction studies and are followed by post-construction studies. The U.S. Fish and Wildlife Service also has a policy of recommending three-year studies.
- ***Wetland Impacts*** – The DEIS does not adequately address the impact of project construction, including roads, transmission lines and turbines, on

wetlands. Additionally, post-construction impacts of storm water run off from new roads and other turbine maintenance facilities must be examined.

- ***Cost-benefit analysis*** – A cost-benefit analysis of the project must be considered so that decision-makers have a thorough understanding of economic and environmental costs and benefits to the region.

In conclusion, we strongly urge the Town of Clayton Planning Board to require the developer of the project, PPM Energy, to take additional time to review the potential environmental impacts of this project proposal. This wind energy facility is anticipated to be in operation for 20-30 years. Taking a relatively short amount of time to study, understand, and plan for the mitigation of any potential impacts will have long-term benefits in ensuring that this development has limited impact on the environment and economy of our region.

Sincerely,

Jennifer J. Caddick
Executive Director
Save The River
Upper St. Lawrence Riverkeeper

Aaron R. Vogel
Executive Director
Thousand Islands Land Trust