

FROM THE DESK OF

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Via Email

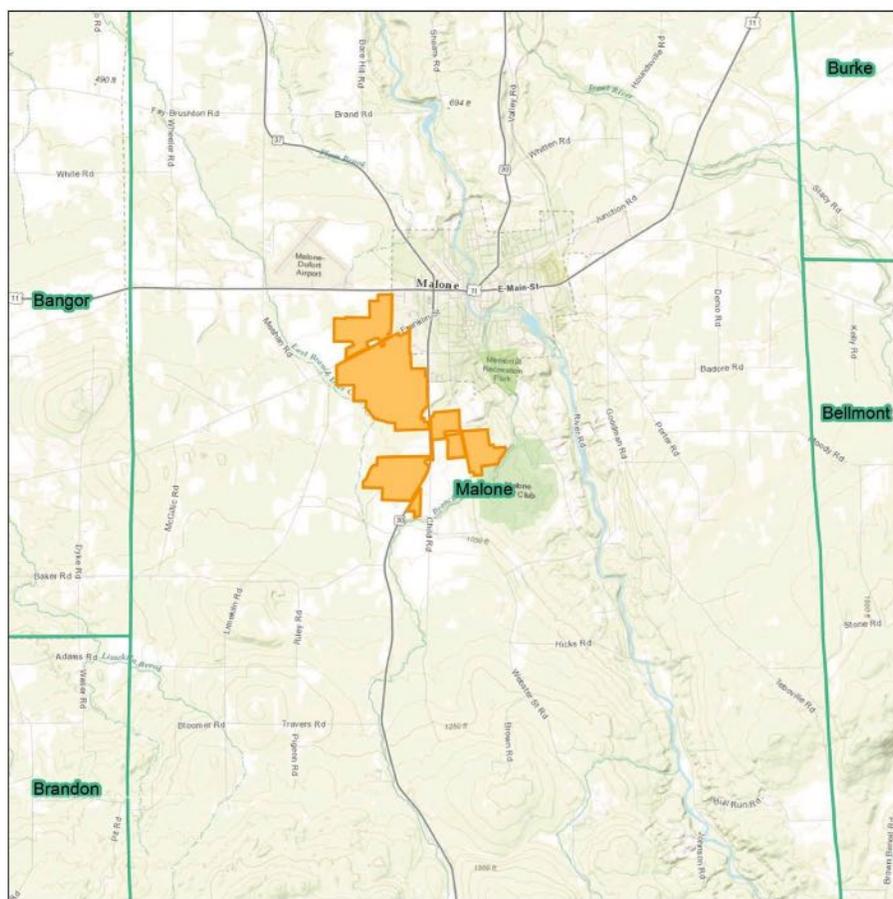
Hon. Kathleen H Burgess, Secretary to the NYS PSC Siting Board

Re. Case No. 17-F-0602: Application of Franklin Solar, LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article 10 of the Public Service Law for Construction of a Solar Electric Generating Facility Located in the Town of Malone, Franklin County.

Dear Hon. Burgess,

Please allow me to submit the attached *Adirondack Trail Scenic Byway Corridor Management Plan* (hereafter called the Plan) as a filed document to the DMM, in response to the PIP filed by Franklin Solar (Geronimo Energy) regarding case no. 17-F-0602.

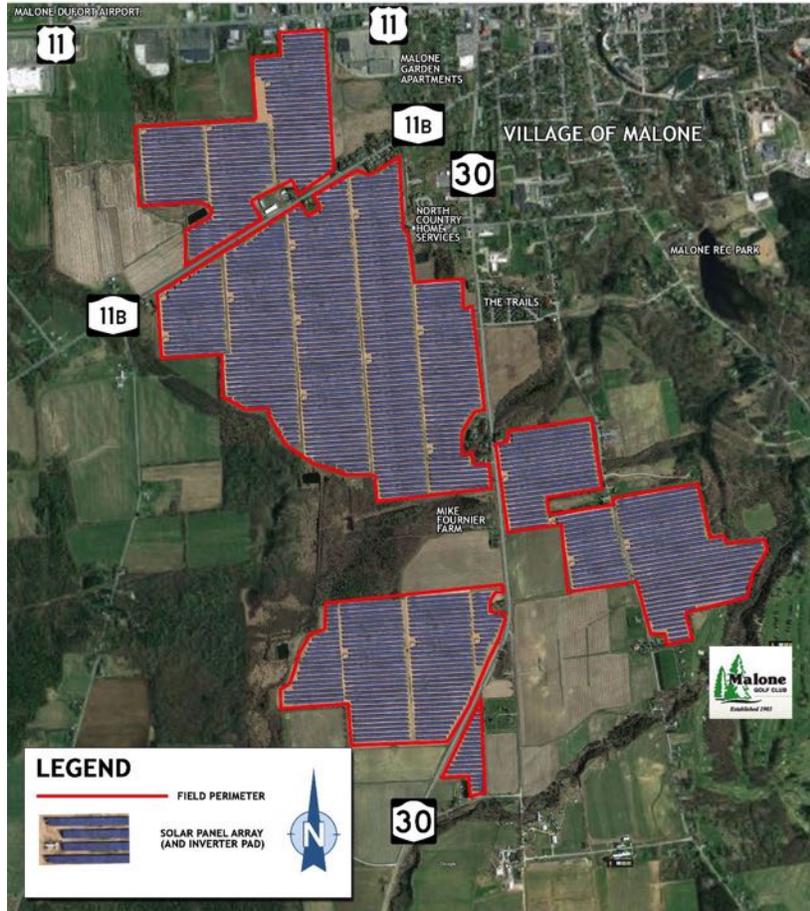
Figure 2, Franklin Solar PIP Plan, p. 9, Sept 2017



As noted in previous correspondence, I head Friends against Rural Mismanagement (FARM), being a group of individuals who live either within the boundaries of the project area or within 5 miles of the Town of Malone.

Since the Plan is voluminous (359 pp.), this cover letter will touch the high points while underscoring Malone’s strategic role within the Plan. My purpose is to demonstrate that the Plan and Geronimo’s plan don’t mix.

ARTIST CONCEPTUAL RENDERING - PROPOSED SOLAR FARM



By Lars Tennyson, Design Services

Our story begins in 1992, when NYS created the Scenic Byways Program, administered by the Dept of Transportation and implemented by the Scenic Advisory Board. The program’s express purpose was to celebrate and capitalize on the “extensive system of over 2,000 miles of roadways that offer exceptional driving experiences throughout the state” (Plan, p. 5).

Many benefits may accrue to communities through which scenic byways pass, including: increased economic benefits through promotion of tourism, improved traveler and community services, broadened appreciation of the State’s historic and natural resources and support for managing and maintaining these resources, improved management of resources to accommodate visitors, more careful stewardship of the byway corridor,

appropriate signs, incorporation of design features in keeping with the attributes of a scenic byway and grants to develop the scenic byway (Plan, p. 5).

Toward this end, the NYS Strategic Advisory Board in 2000 enlisted the Adirondack North Country Association (ANCA)¹ to prepare a comprehensive Corridor Management Plan (the Plan) for the state's crown jewel, the Adirondack Trail Scenic Byway. (It's important to understand that the Plan was necessary to qualify for federal Scenic Byway & Enhancement funding, under the Federal Highway Administration & Transportation Equity Act for the 21st Century.)

I have called the Adirondack Trail NYS's "crown jewel." Few people would dispute this. The Adirondack Trail Scenic Byway (aka Adirondack Trail) is iconic throughout North America and well beyond, drawing visitors from around the world to the beauty, majesty, and wildness of the globally unique Adirondack Park—six million acres of "forever wild."

- Six million acres of some of the best canoe and kayak country on the continent, rivaling Minnesota's Boundary Waters, Ontario's Algonquin Park, and Alaska's famed Kenai Peninsula.
- Six million acres of some of the best fly and lure fishing in North America, rivaling Montana, Colorado, and streams and wild rivers of Québec, Ontario, British Columbia, and even Alaska.
- Six million acres with some of the continent's best downhill and cross-country skiing, snowmobiling, and dog sledding.
- Six million acres offering unsurpassed camping, hiking, mountaineering, birdwatching, sailing, motor boating, and hunting.

Malone is the northern gateway to this wilderness, tourist, and sportsman's paradise.

The Plan was the work of numerous local and state agencies and individuals, meeting and conferring over 4 years. A prodigious amount of thought and labor went into this project. I quote from the Plan.

ANCA contracted with the Friends of the North Country,² Wildlife Conservation Society,³ North Woods Engineering⁴ and assigned their own organizational project coordinator to head each of the Local Action Committees and Local Advisory Groups. The facilitators were selected for their expertise in community planning work and familiarity with specific Byway areas (Plan, p. 6).

¹ <https://adirondack.org>

² <http://www.friendsofthenorthcountry.org>

³ <https://www.wcs.org>

⁴ <http://www.north-woods-engineering.com>

The facilitators organized and directed community-planning discussions which were open to the public and then used the information collected in the field to draft the four local Corridor Management Plans. Created at the grassroots level these plans detail how the various Byway communities define the best approach for future efforts in their area (Plan, p. 6).

ANCA organized a regional Steering Committee that served as advisors to unify planning efforts. During four work sessions in 2002 and 2003 the Steering Committee reviewed the information brought forth by the four Local Action Committees and their Local Advisory Groups and made recommendations on how to combine the sub-regional plans into a master regional plan. The Steering Committee offered a regional perspective integrating the local village, city and town planning recommendations into strategies that would serve the entire Byway area. The Steering Committee consisted of community organizations, county planners, Chambers of Commerce, tourism directors, the New York State Department of Environmental Conservation, the Adirondack Park Agency, the New York Power Authority, and other interested parties (Plan, p. 6).

In November of 2003 the Steering Committee entered into discussions on the type of projects that would best serve the Byway now and in the future. Representatives from the Local Action Committees and Advisory Groups presented project ideas from their segments of the Byway to give the Steering Committee a sampling of the type of activities suggested by the various Byway communities. The ideas presented evolved from a series of community work sessions where project facilitators engaged local representatives in grass roots discussions. Facilitators directed community level meetings to collect the core information needed to prepare local and regional plans. Together with the stakeholders they named special local assets, researched local history, identified related plans and studies, listed and mapped contributing resources, discussed major issues and opportunities, created a local vision, theme, and goals, and developed action plans including both projects in motion and proposed initiatives (Plan, p. 14).

Developers like Geronimo Energy need to grasp that the Adirondack Trail is more than a highway; it's a comprehensive economic, cultural, social, municipal, and administrative vision and program for the landscape and communities along this spectacular, 188-mile corridor of NYS. A vision conceived and put into effect after hundreds of hours of brainstorming and discussion by hundreds of state, regional, county, municipal, and private individuals all working toward the goal of making the Adirondack corridor into a thriving economic engine & cultural phenomenon founded squarely on national and international tourism and winter and summer sports: golf, fishing, hunting, camping, canoeing/kayaking, skiing, mountaineering, hiking, mountain-biking, combined with nature & cultural centers such as the celebrated Paul Smith's

Visitor Interpretive Center⁵ (along with Paul Smith's College and its top-notch forestry program), the Tupper Lake Wild Center,⁶ the Blue Mountain Lake Museum,⁷ and Malone's Almanzo Wilder Farm.⁸

The project is a work in progress and, yes, it's flourishing. Let me emphasize, this is a planned project carefully designed to attract state and federal funding for its implementation—again, based on national & international tourism and winter & summer sports. It is not based on sprawling solar energy factories or, for that matter, metastasizing wind turbine factories (as we witness directly to the east of us).

It's inconceivable that Geronimo, showing up from Minnesota, can waltz into town and ignore or be blissfully unaware of this huge project. We're not talking about any old 900+ acres in any old town in NYS; we're talking about a massive state project that has been underway for over a quarter century, of which this 900+ acres is an essential ingredient and—thank you, Geronimo!—is already earmarked for other purposes by the state, the county, and the two municipalities of Malone.

Back to the blueprint for this 188-mile swath of landscape, culture, and, yes, wildness. The Plan divides the Adirondack Trail into four segments (Plan, p. 3):

Village of Malone to Malone/Duane Town Line
Franklin County (Northern Segment)

Malone/Duane Town Line to Altamont/Long Lake Town Line
Franklin County (North Central Segment)

Franklin/Hamilton County Line to Hamilton/Fulton County Line
Hamilton County (South Central Segment)

Hamilton/Fulton County Line to Village of Fonda
Fulton and Montgomery County (Southern Segment)

Focus on the Northern Segment, beginning "at the intersection of Routes 30 and 11 in the Village of Malone in Franklin County and follow[ing] Route 30 south through the Town of Malone to the boundary line with the Town of Duane" (Plan, p. 17).

⁵ <http://www.paulsmiths.edu/vic/>

⁶ <http://www.wildcenter.org>

⁷ <https://www.theadkx.org>

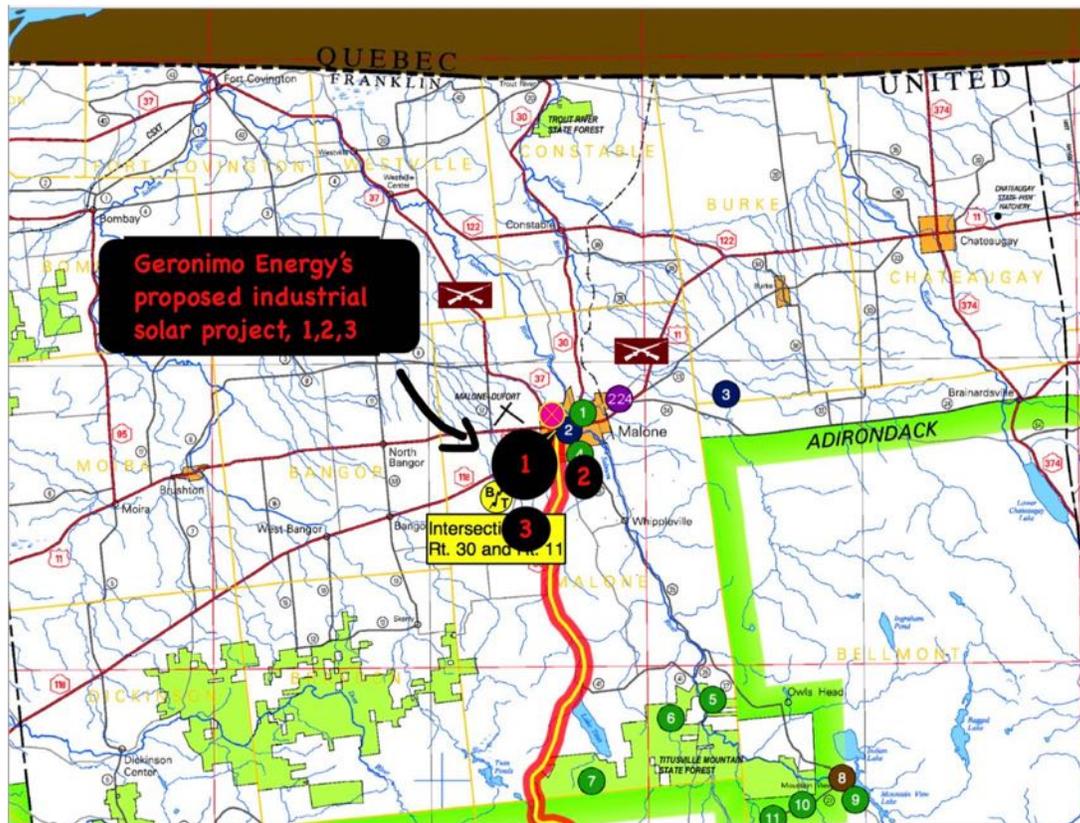
⁸ <https://almanzowilderfarm.com>

Plan, p. 60



If Geronimo has its way, the northern portal of this amazing cultural/social/agricultural/wildness project will be violated and disfigured by a 900+ acre industrial solar plant.

Plan, p. 60, with solar project super-imposed



Violated? A colossal industrial solar plant is not even remotely compatible with the Plan. In fact, the Plan calls for precisely the opposite.

One of the goals of this plan is to promote tourism as a primary generator of economic development (Plan, p. 108).

At the same time, the Local Action Committee hopes to keep the hometown quality of life and sense of "rural quaintness" that will draw permanent residents (Plan, p. 109).

The Plan has this to say about the Northern Segment, anchored by Malone.

This local segment of the Adirondack Trail Scenic Byway, which extends 11.4 miles from the Town of Duane/Town of Malone border to the intersection of Route 11 in the Village of Malone, leads travelers through the inviting Salmon River Valley's waterway and into the foothills of the Adirondack Mountains. The Byway is a gateway not only to the major urban areas of Ottawa to the northwest and Montreal to the northeast, but to the St. Lawrence River Seaway and the St. Lawrence Valley to the west (Plan, p. 72).

Route 30 leaves the Town of Duane (and the Adirondack Park boundary) and travels North through the Town of Malone approximately 3 miles, passing Lake Titus and the turn off for Titus Mountain on Route 41. Along this traditionally agricultural area, gently rolling hills, winding roads, mature forests, and farmlands prevail. At mile ten, the southern Village of Malone is reached. As the traveler approaches the Village of Malone, contemporary and traditional farmhouses become denser. The Adirondack Trail Scenic Byway's terminus is located at the intersection of Route 30 with Route 11. This junction is Malone's primary crossroad situated just one half mile from the center of downtown. Route 11 has been designated as the Military Trail Scenic Byway (Plan, p. 72).

Malone developed around the Salmon River, and its historic downtown and mill buildings are clustered at this point. One area of interest within the Village of Malone is found in the vicinity of Route 30 and Main Street, Elm Street and Constable Street, where a concentration of stunning Victorian homes is located. An eclectic mix of commercial and residential buildings is present in the Village, including the aesthetically pleasing and interesting Main Street. Walking tours are available to view the beautiful historic houses, churches and other significant structures located in the Village, as discussed further under "Historic Resources" within the Intrinsic Qualities section. Driving through the heart of the Village of Malone's Victorian neighborhoods or past its storefronts offers quintessential views of a quaint Northeastern mill town (Plan, p. 72).

Both the Village and Town of Malone take seriously their role in this cultural and economic pageant called the Adirondack Trail. Downstate and out-of-state investors are renovating distressed buildings in the village and renting them to well-employed tenants. One such investor is Frank Bova, owner of BSB Construction⁹ in Poughkeepsie. Frank grew up in Bombay, left town to make his fortune, and has returned in the form of Eighty-Six Washington, LLC, a company devoted to restoring old homes and buildings in the Village of Malone. Since 2007, Eighty-Six Washington has restored 16 homes in the village. The other day I was notified that Frank's company bought 4 more distressed homes at the autumn county auction. These will doubtless be restored and rented within the next 6 to 8 months. This past August, MCM Development purchased the huge, empty buildings at 399 & 403 E. Main St., Malone, and have launched a major renovation of what they have christened The River Building—right on the Salmon River.¹⁰ Several years ago, MCM completely renovated the Richardson Building at 461 E. Main and made it into gorgeous, high-end apartments, with office space at street level.¹¹

Here is an example of other renovations going on throughout the village.

14 Clay St., Malone: Before



14 Clay St., Malone: After



As part of the Adirondack outfitting and sport theme, the Village of Malone is home to the International Border Company (IBC), drawing shoppers from Vermont, downstate and western NYS, Quebec and Ontario.¹² IBC is a credible regional rival to Maine's famed L.L. Bean.

⁹ <http://www.bsbconstructioninc.com>

¹⁰ <https://www.trbny.com>

¹¹ <https://www.richardson1909.com>

¹² <http://www.ibcmalone.com>

All this is part of a concerted effort to bring to fruition the economic and cultural theme of the Adirondack Trail.

Then there is the Salmon, mentioned above—a breathtaking whitewater spectacle churning through the heart of Malone. Old timers will tell you that the Salmon River is one of the best kept secrets among Adirondack guides, who bring only select customers to the Salmon for the trout-fishing experience of a life-time:

“Take a few minutes and read the current,” whispers the guide, leaning over the shoulder of the client. The water’s perfect: temperature in the high 50s, a nice cut-bank on the far side of the stream, a spectacular Hendrickson mayfly hatch just getting going. Trout-rises dimple the surface, the rings of a small wave fade into the current as hungry fish suck up mayfly duns drifting overhead.

A few moments of studying the river, he whispers again. “I recommend a 7-foot 5x tippet with, say, a size-12 fly imitation.” (Fly fishing lingo.) Then a smooth cast upstream, mend the line to keep the fly from dragging, and remember to hold the rod tip high.

A fly-fisherman’s dream unfolds on the Salmon River. One of the state’s premier trout streams, the Salmon bisects Franklin County between 44 degrees 30 minutes north and 45 degrees north latitude. Perfect latitude for trout.

The Salmon is without doubt one the finest fishing streams in the state. Deep pools, cool summer temperatures, and abundant insect populations yield superior summer and winter habitat.

The best trout fishing is from Westville south to Chasm Falls. If you’re after native brook trout, I recommend the stretch from Whippleville south to Mountain View. For rainbows, pay attention to the section downstream from North Country Community College. Browns are pretty well dispersed from Mountain View to Westville. The State Department of Environmental Conservation enhances fish populations with yearly stocking of browns and rainbows (check here for stocking information). Even so, the Salmon’s cool temperatures and deepwater cauldrons provide for exceptionally high rates of natural reproduction.

Any seasoned fisherman will tell you that a good measure of a healthy fishery is the diversity and abundance of food sources. Fish food, that is. The three insect species making up the staple of a trout’s diet are stoneflies (Plecoptera), mayflies (Ephemeroptera), and caddisflies (Trichoptera). All three require highly oxygenated water, found only in cool lakes, rivers, and streams with low pollution.

The Salmon has excellent populations of all three.

A dorsal fin skims the surface with each rise. "Stay low. Don't spook him," warns the guide. Every word hushed. (Fly fishing is a soft-spoken sport.) He slips into the current, 40 feet downstream. Then drops a perfect cast 10 feet above his prey. Slowly the dry fly floats into the trout's feeding lane. (The idea is to make it appear as natural as Mother Nature. "Mend the line for a drag-free drift.")

The take was subtle, though the form was one they had seen before. It's the trout of a lifetime. He lifts the rod tip, sets the hook—and the fight is on. "Hold him in the slack water! Keep the line tight!" Slowly, ever so patiently, working the large brown to a hovering net.

"Snap that picture real quick, and we'll send him back for another day."

Soft-spoken, patient, an altogether beautiful performance. Called the Salmon.

— John Miletich, "Fly-Fishing the Salmon," in RiverCityMalone.com (April 20, 2008)¹³

It's no surprise that Malone is home to the annual Hendrickson Hatch Fly Fishing Tournament, May 31 & June 1.

"Residents seek to rejuvenate Malone's industrial center around the Salmon River," continues the Plan,

this time capitalizing on its scenic and historic draw to visitors. Development of the "Riverwalk," an idea for the re-use of historic downtown's commercial and industrial buildings alongside the natural setting of the Salmon River, is a major objective of the Local Action Committee, as it is with the Malone Revitalization Foundation¹⁴. . . . Recently, the state, at the request of the Town Council of Malone, designated the Salmon River an "inland waterway," making this project eligible for additional grant funds (Plan, p. 109).

There's more. The Malone Golf Club is considered "the finest golf facility in Northern New York, Southern Quebec, and Ontario. We have 36 Championship golf holes divided into two great golf courses designed by Robert Trent Jones. We were recently awarded four and one half stars

¹³ <http://rivercitymalone.com/malones-assets/fishermans-dream/>

¹⁴ <https://www.facebook.com/MaloneRevitalizationFoundationinc/>

by 'Golf Digest' and received the 'Good Service' seal for both our East and West Courses."¹⁵ Geronimo's mammoth solar array would abut this course. Glare from the solar panels would absolutely impact the course, with predictable results for visiting golfers.

Glare from solar panels in Vermont



Finally, as part of the Adirondack Trail sport and tourist theme, we have Titus Mountain, frequented by skiers from all over the state, as well as Ontario and Quebec.¹⁶ Titus offers "ski and stay" packages for families and other groups. So does, by the way, the golf course.

¹⁵ <http://www.malonegolfclub.com>

¹⁶ <https://www.titusmountain.com>

In 1976 Norman Maclean published "A River Runs Through It." "My father was very sure about certain matters pertaining to the universe," it begins. "To him, all good things—trout as well as eternal salvation—come by grace and grace comes by art and art does not come easy"¹⁷ A famed trout river runs likewise through Malone, a river which is vital to a state and community plan called the Adirondack Trail—a corridor of wildness, agriculture, forestry and quaint towns whose economic future, according to the plan, lies in tourism and sports. Paraphrasing Maclean, all the good things of this future come by planning, and planning comes by hundreds of individuals and agencies working together for a common goal, and that common goal does not come easy—as when ham-handed corporations come barging in and threaten to derail and defile the process.

Sincerely,

Michael J. Fournier

Michael J. Fournier

Party to Case No. 17-F-0602



"Salmon River" by Gail Bessette, Malone artist

¹⁷ Norman MacLean, *A River Runs Through It* (Chicago: Univ of Chicago Press, 1976).