

Policy on Wind-Energy Facilities

(As adopted by the ATC Board of Directors on November 3, 2007)

The Appalachian Trail Conservancy seeks to preserve and protect the scenic, cultural, and natural resources of the Appalachian Trail and the Appalachian Trail experience, as defined by the National Trails System Act and ATC policy. To this end, ATC seeks to avoid, minimize, or eliminate the visual, noise, and experiential impacts of all utilities including wind-energy facilities.¹

The Conservancy supports the need for increased renewable energy generation, energy conservation, and end-user efficiencies. The Conservancy recognizes that generating electricity from wind holds promise to mitigate or slow the negative impacts of air pollution and climate change on the Appalachian Trail environment and hiker health. However, like all forms of electric generation, wind-energy facilities can have impacts on the environment and on human values, including the scenic, auditory, ecological and recreational values associated with the Appalachian National Scenic Trail. Careful siting of wind-energy developments is crucial in the protection of the Appalachian Trail experience. This policy statement is limited to the siting of facilities in the mountainous regions through which the Trail passes.

Evaluation Criteria:

Each wind-energy project will be reviewed on a case-by-case basis. The Conservancy may oppose, may not oppose, or may endorse any project using the following evaluation criteria:

Appalachian Trail Lands: Wind-energy facilities are not appropriate on any of the lands that are part of the Appalachian Trail corridor. The corridor is defined as those lands acquired by the National Park Service under Appalachian Trail authorities, Appalachian Trail Management Areas or Prescription Areas delineated in National Forest Land and Resource Management Plans, protection zones outlined in cooperative agreements and memoranda of understanding with local, state or federal agencies, or any other instrument that defines protected areas of the Appalachian National Scenic Trail.

Visual Impacts: The Appalachian National Scenic Trail is managed to preserve scenic integrity. The Conservancy has developed a body of policies designed to maximize natural or natural-appearing landscapes. Because of the size of modern wind turbines and the necessity of locating them on mountaintops, these facilities are visually prominent and can be serious intrusions on the desired natural character of the A.T. viewshed. ATC will use the USFS Scenery Management System to evaluate impacts of proposed wind turbines or wind farms on the Appalachian Trail viewshed. In general, ATC opposes new wind-energy facilities in the foreground and middleground viewsheds (up to four miles). In the case of projects in the background viewshed (four miles to the horizon) visual impacts will be weighed based on the following factors:

- Height and Size of the turbines: The height of the turbine will have a great deal to do with its visual prominence.

¹ For the purposes of this policy the following definitions are used:

Wind turbine: A single structure consisting of a tower, a nacelle, and blades that rotates in the wind for the purpose of generating electricity.

Wind Farm: A grouping of wind turbines in a single location.

Wind-Energy Facility: Either a single wind turbine or a wind farm.

Related Infrastructure: The developments and improvements that are required to install, maintain, and operate a wind farm. These consist of roads, power lines, buildings, fences, electrical sub-stations and any other man-made developments and man-altered conditions relating to the wind turbines.

- *Presence or absence of FAA Hazard Lighting:* Currently, structures more than 200-feet tall are required to have FAA hazard beacons to protect against aviation collisions. Hazard lighting has a significant impact on visual integrity of a landscape, even at great distances. Lighting also may negatively impact or kill birds and bats. In some settings, turbines less than 200 feet that are not lighted may be acceptable where larger towers with aircraft hazard beacons may not.
- *Scope of the project:* The number of turbines and the length of ridgeline that is developed will affect the visual prominence and the number of Trail viewpoints from which the project will be visible. The siting of the associated infrastructure can also have a significant affect on the A.T. viewshed. Locations and construction of power lines and roads should be analyzed as part of any visual assessment.
- *Landscape setting:* Undeveloped landscapes are less acceptable for development than settings with other permanent signs of development such as cities and towns, roads, mountaintop developments such as telecom towers or ski areas, or permanent landscape alterations such as a mine or quarry. Temporary landscape modifications such as timber harvesting should not be used as a factor in deciding whether a landscape setting is suitable for wind-energy development.

An additional factor is the viewer's location on the Appalachian Trail. Viewing-locations that offer sweeping long-distance vistas to A.T. hikers such as balds, open areas, alpine areas, cliffs or firetowers are considered more sensitive. Also, viewing-locations that are in Wilderness, Wilderness Study Areas, National Recreation Areas, NPS Natural Areas and remote areas more than two miles from a trailhead or road crossing are considered more sensitive. The number of Trail locations from which a project is visible also will be a factor. If a project is visible from a single location it may be more acceptable than if it is visible from several prominent vistas over a longer section of the Trail.

Noise Impacts: Turbines make noise as they spin, particularly in high wind conditions. Turbines should not be heard from the Appalachian Trail footpath and its facilities on an ongoing basis.

Project Setting: The setting for a wind farm is crucial in determining the degree of impact on surrounding lands including A.T. lands.

The following settings are better suited to the development of wind-energy facilities:

- Ridges with existing high-standard roads, and/or with slopes suitable to road and turbine construction
- Ridges with existing developments such as telecom towers, ski areas, microwave relay towers, power lines and similar development
- Ridges in proximity to developed landscapes such as cities and towns
- Ridges with permanent landscape alterations such as mines or quarries, highway cuts, recovering areas, etc.

The following settings are not suited to wind-energy facilities:

- Wilderness areas and study areas
- National Recreation Areas
- Semi-primitive non-motorized areas (USFS lands) and roadless areas
- Old-growth forests and habitat for rare species or exemplary natural communities
- Cultural-resource sites or historic landmarks
- Important bird or bat habitats and migration routes
- Unique or important ecological or recreation sites identified by state, regional or township land-use plans.
- Ridge tops with very steep slopes or soils ill-suited to road building and turbine construction

Public vs. Private Lands: Wind-energy facilities are being considered on both public and private lands. ATC believes that wind-energy facilities are best suited to private lands. If a project is being considered on public lands, there should be no net loss of A.T. values as a result of the development. Mitigation, on or off-site, may be applied to achieve the no-net-loss of Trail values standard.

Mitigation and Off-sets: Is there adequate mitigation or off-sets for any significant loss of Trail values? In cases where a mountain-top wind farm is proposed, achieving on-site mitigation may prove to be impossible. In those cases, off-site mitigation or off-sets may be considered. Examples of off-site mitigation or off-sets include additional conservation-land acquisition, removal of other developments, and designation of lands as off-limits to future development through conservation easements, among other techniques. The trade-offs of mitigation or off-sets require careful consideration for unintended consequences, e.g., visual vs. wildlife.

Energy Issues: Because there are both societal benefits to renewable energy and significant adverse impacts associated with the installation of wind farms, the benefits of any individual project must be weighed in relation to the costs. Some of these factors include:

- Source of power that is likely to be displaced by the wind farm: Will the wind displace fossil-fuel plants or other renewable sources? (This is a remarkably complex question, but in some circumstances it seems likely that wind will not displace fossil fuels, but rather will lead to closure of biomass generation or increased peaking of hydroelectric dams.)
- Power production in relation to the severity of impacts: Will the amount of power produced be in proportion to the severity of the impacts?

Action Plan

ATC will work with agency partners to incorporate these criteria into agency plans and regulations and encourages its member clubs to do likewise.

ATC will participate, and encourage A.T.-maintaining clubs and agency partners to participate, in public-review processes for all wind-energy development proposals located within the viewshed of the Appalachian Trail.