



*Friends of Clifton Park Open Space, P.O. Box 821, Clifton Park, New York 12065*

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October 25, 2018

To: Phil Barrett, Clifton Park Town Supervisor

Friends of Clifton Park Open Space is concerned about the growing number of applications for solar farm special use permits in the Western Conservation Zoning area. It has been reported recently and we have confirmed with the Planning Department that several solar farm projects have been proposed for this area and this new use has been permitted with a special uses permit which completely ignores the other use provision of the zoning code.

- These projects are not required to conserve any percentage of the property for open space. For instance, the Ashdown Road solar farm lease area consumes slightly more than 100% of the buildable acreage available on the parcel.
- There is no enforcement of the code's requirement for the payment to the town of incentives for higher use of the unconstrained land. (Section 208-43.13 and 14, "Permitted Incentives" by the town Board)
- The proposed projects appear to all be 25 year exclusive use land leases which will, effectively, cordon off the projects with chain link or equivalent fences. We have seen no recitation of how the solar companies intend to control the growth of vegetation within and around their perimeters. Since some of the projects under consideration are adjacent to wetlands, stream corridors and water recharge areas, we think it necessary that this issue be addressed.
- We appreciate that some farmers can receive handsome returns for their land by leasing to solar power companies, but the town receives no incentive dollars to encourage those farmers to continue protection of the land in agriculture.

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- Good farmland and its economic value to the town, both financially and through scenic vistas, are lost.
- The Green “C” which allows for the formation of contiguous lands into an open space path for animal protection, wildlife migration and overall habitat is lost. These critters then become a nuisance for homeowners and citizens in general.

We understand that these current projects are small and generally do not fall under the NYS Article 10 Guidelines for land generating 25 Megawatts or more. That would usually require approximately 139 acres of land. And we applaud the town’s use of solar energy production on town lands like the transfer station. However, we do believe that additional standards in our Town Code are needed in order to ensure a reasonable balance between the original intention of the CR Zoning and the evolving demands for renewable energy sources in the town and throughout the state.

Furthermore, we endorse the sentiments of the town’s Environmental Conservation Commission’s letter of September 19<sup>th</sup> and its concerns for:

1. Project Density
2. Lack of Zoning Incentives
3. Negative Impact of Proposed Solar Projects on the Goals of the Western GEIS
4. Potentially Peril to Migratory Bird Species Using the Nearby Vischer Ferry Nature Preserve
5. Loss and Fragmentation of Habitat and its Impact on Wildlife in the Green “C”

We also believe there is a critical need to consider what sort of zoning and other rules should be in place to ensure the solar arrays do not disrupt the goals outlined in the Western Conservation Zoning codes. Therefore, we urge the town to at least apply the same standards and provisions outlined for residential development in the current code to the proposal of new solar arrays.

Thank you for your consideration to these comments,

Friends of Clifton Park Open Space  
friends@cpopenspace.org

CC: Brian Glick, Chairman ECC  
David Miller, Chairman Clifton Park Open Space Riverfront and Trails Committee  
John Scavo, Director Clifton Park Planning Department