



## Partnership for the National Trails System

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### PARTNERSHIP FOR THE NATIONAL TRAILS SYSTEM POLICY ON ENERGY GENERATION AND COMMUNICATION FACILITIES

**Preamble:** This policy is adopted by the Partnership for the National Trails System for its use in reviewing and commenting upon energy generation and communication facilities. It is also intended as guidance for members of the Partnership (although members of the Partnership are free to develop their own policies or approaches to this issue, based upon their own particular circumstances).

**Background:** Coal-fired, oil, natural gas, nuclear, hydro-electric, wind, solar, biomass, and other industrial-grade energy generation facilities have the potential to dramatically affect National Scenic and National Historic Trails. Communication facilities and access roads to them, particularly in remote areas, also have the potential to affect National Scenic and National Historic Trails.

Energy generation facilities and communication towers provide essential components of modern living for the vast majority of the American public. Congress also provided for these uses to be authorized when necessary. The National Trail System Act provides that “(o)ther uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with administration of the trail.”

However, these projects also come at a cost. The visual and sometimes audible impacts associated with these industrial-scale facilities can have a significant effect on visitors’ experiences on National Scenic and National Historic Trails, and in some instances, destroy the very values that Congress intended to preserve when these Trails were designated.

Adverse impacts of industrial-scale power generation facilities can include large-scale modifications of the landscape, concurrent visual impacts, associated access roads and transmission facilities, and night-sky light pollution. Fossil fuel-generated power plants contribute to air pollution, including carbon dioxide, nitrogen oxides, sulphur oxides, and trace metals. The carbon dioxide emissions of these facilities, in particular, are associated with climate change. Nuclear generation facilities result in spent nuclear fuels (which must be contained in facilities isolated from human habitation and the environment for thousands of years), releases of small amounts of radioactive isotopes, and the potential for release of large quantities of radioactive materials during accidents. Hydroelectric facilities disrupt natural flow regimes of rivers and aquatic organisms. Wind farms can consume large landscapes, kill both birds and bats, and are often situated on mountain ridges with corresponding visual impacts. Industrial-scale solar plants can consume large areas of the landscape and amounts of water as well. In addition, all these facilities require transmission facilities and access roads, often in remote locations.

Communication facilities are often located on the highest ground, and as a result, are visible for miles in every direction – and frequently are located near National Scenic Trails traversing mountain ranges, ridges, and hills.

The number of power generation facilities and communication projects located proximate to National Scenic and National Historic Trails will continue to grow. If left unchecked, the cumulative impacts of these projects also will continue to increase over time, diminishing the natural, cultural, scenic and recreational values of the National Scenic and National Historic Trails.

**Policy:** The purpose of this policy is not to seek to prohibit power generation facilities or communication facilities along the routes of National Scenic and National Historic Trails, but to encourage the owners and permittees of these facilities to recognize and mitigate the adverse effects of those facilities deemed necessary to the greatest extent possible. A power generation or communication facility, by its nature, may substantially interfere with the nature and purposes of a National Scenic or National Historic Trail if it is located within the viewshed of that National Trail.

The Partnership for the National Trails System will seek to preserve, protect, and promote the enjoyment of National Scenic and National Historic Trails in such ways that the natural, cultural, historic, scenic, and recreational resources of these Trails are not adversely affected by power generation or communication facilities. To this end, the Partnership hereby adopts the following policy:

The Partnership will encourage Federal, state, and local agency authorities to adequately analyze the site-specific *and* cumulative impacts of any proposal for a power generation or communications facility, seek opportunities for location of such facilities so that the impacts to National Scenic and National Historic Trails are mitigated by distance wherever possible, and require full mitigation for all residual impacts to Trail values. The Partnership will concur with, and not oppose, a proposal for a power generation or communication facility *only* if:

- 1) said power generation or communication facility has been determined to be in the public interest, as a result of a thorough public process that results in a determination that the project is needed and that the proposed project is an environmentally acceptable method for meeting that need;
- 2) a determination has been made that the only feasible location for that facility is in a location proximate to a National Scenic or National Historic Trail or an auto tour route for a National Historic Trail;
- 3) a thorough environmental analysis of the project has been completed, including visual impact analysis and “seen area mapping,” and the impacts to natural, cultural, historic, scenic, and recreational resources have been accurately documented and disclosed;
- 4) the adverse impacts of the proposed project can and will be adequately mitigated, through a combination of mitigating measures that will achieve a result of “no net loss” of the National Scenic or National Historic Trail’s natural, cultural, historic scenic, and recreational values.

The following special resource areas, at least to the extent that power generation and communication facilities are situated within the foreground or middleground view of a national scenic or historic trail, should be considered as exclusion zones, where proposed new facilities should not be permitted:

- wilderness areas, potential wilderness areas, and recommended wilderness areas;
- historic sites and key interpretive sites, particularly along National Historic Trails;
- “High Potential Sites and Segments” of National Historic Trails;
- Forest Service inventoried roadless areas;
- Forest Service primitive and semi-primitive areas; Bureau of Land Management non-motorized areas; and National Park Service natural areas;

- natural heritage sites, and appropriate buffer zones;
- designated National Wild, Scenic, and Recreation River corridors;
- important or prominent public-use areas, including waysides, campsites, shelters, and overlooks and the foreground and middleground views from these sites
- unique habitats and ecological communities, including, but not limited to, alpine zones, wetlands, tidal zones, riparian areas, prairies, and savannahs; and
- any other special area where significant Trail values, such as a sense of remoteness, would be compromised.

Alternatively, the Partnership supports the identification of zones where power generation and communication facilities *should* be located, provided no other prudent and feasible alternatives exist and mitigation sufficient to achieve a “no net loss” condition has been included in the project design. The logical place for such a zone, in many (but not all) cases, is adjacent to existing generation or communications facilities, or close to an existing linear transmission facility, highway, or access road in an area that has already been developed.

Finally, the Partnership strongly supports Secretary of the Interior Order No. 3330, “Improving Mitigation Policies and Practices of the Department of the Interior,” issued October 31, 2013, and the recommendations presented in the companion document, “A Strategy for Improving the Mitigation Practices of the Department of the Interior,” dated April 2014. The Partnership is seeking similar direction for national forest lands through the USDA Forest Service’s forest management planning process.

Adopted October 22, 2014