

Knox Solar Project (last revised 12/29/20)

SEQR: FEAF Additional Information (Part 3)

The following information supplements the Full Environmental Assessment Form (FEAF) Part 1 for the Knox Solar project. It provides further information on the potential impacts to facilitate a thorough review in accordance with 6NYCRR Part 617 State Environmental Quality Review Act (SEQRA). It only addresses categories where there may be potential impacts, as identified in the Part 1 and EAF Mapper, and documents and expands upon answers in part 2 of the FEAF (and raised at the public hearing).

Project Description and Action

RIC Development, LLC is exploring the development of a new solar facility – Solar Photovoltaic generation plant. The proposed project's potential location is 1716 Thompsons Lake Road, East Berne (Knox), NY 12059. The project, as conceptually designed will have a capacity of 4,400 kW at the Point of Common Coupling. The project is designed to have a direct current (DC) capacity of 6,156 kW. The proposed project is a standalone ground-mounted system, mounted on fixed-tilted steel structures. The system will include 4 inverters - two pairs of the inverters are each connected to a single dual-winding transformer. The total planned quantity of PV modules that the project contains is 16,200. The parcel area totals 32.9-acres of land and is comprised of one (1) parcel identified as follows by the Albany GIS mapping system:

1716 Thompsons Lake Road S.B.L: 59.-2-20 32.90-acres

The Project Site is located on the eastern side of Thompsons Lake Road with the approximate center of the site located 160 feet south of the point where Old Stage Road begins off Thompsons Lake Road. The north side of the site is bounded by several residential parcels and tree cover. The east side of the site is bounded by multiple single-family residential lots on the edge of the wooded area. The southern side is bounded by a larger section of residential land, with the northwest corner of Thompsons Lake State Park being approximately 340 feet from the southeast corner of the site. The western side is bounded by Thompsons Lake Road along with a combination of single-family residential homes that includes a pond that lies approximately 43 feet from the centerline of the road.

The Project site is undeveloped and covered with a mix of deciduous and coniferous trees. From an aerial view, the western side of the site consists of various sections of open fields but following a site visit on August 4, 2020 it was determined that these areas are currently overgrown with vegetation. There are also the remnants of an asphalt driveway that extends approximately 110 feet into the site towards the southwest. The remainder of the site can be described as a large wooded area with a noticeable increase in ground elevation as you travel west to east.

Construction will be performed in approximately 3 months, with construction beginning in the 2020/2021 timeframe. The facility will require little maintenance and will be controlled and monitored remotely by Knox PV, LLC, who will maintain the landscaping and cut the grass as necessary to reduce shade on the panels. After the approximately 30-year operational life, the solar facility will be decommissioned, dismantled, and removed.

The purpose of the proposed action is to generate renewable energy, fulfilling the need to supplement communities with distributed energy suppliers to increase the resilience of their energy supply. The proposed action also contributes to the state's renewable energy goals in its efforts to

lessen energy production's impact on the environment and take incremental steps to respond to climate change.

Impact on Land

There will be disturbance of land to install the solar arrays. There are no steep slopes (although the site has topography – some hills) or areas of high bedrock conditions within the project area. There are areas of high groundwater conditions, but these areas will be minimally impacted, and the racking systems will have no impact on the groundwater. There will be limited excavation to install the mounting system.

No impact from erosion is anticipated (with proper SWPPP). It was noted by residents that there are existing erosion/stormwater problems in the area. The removal of the trees on the site and reseeded of the site will reduce the erosion that may currently be happening on this site and the project will not impact any off-site erosion.

Based on the above, no significant impacts to land are anticipated.

Impact on Water Resources

According to mapping available from the National Wetlands Inventory, there are potential wetlands in the Project Site area. A wetland delineation was completed by Earth Dimensions for the client in July 2020. The investigation identified two potential wetlands areas. Wetland #1 in the northwestern (front) part of the site is probably jurisdictional and Wetland #2, in the center of the site, is probably non-jurisdictional. Based on this, the project as laid out currently, would not impact wetlands. At the time of this study, the mapping and report completed by Earth Dimensions had been submitted to USACE for a request for a wetland boundary confirmation and jurisdictional determination. A letter of No Jurisdiction was received on 11/2/20. Therefore, no impacts are proposed to federal wetlands based on this jurisdictional determination. It is the professional opinion of Earth Dimensions, the wetlands consultant, that the project may proceed without the need for Section 404 Permit. Refer to attached maps for more information.

As shown on the FEMA map, the Project Site is not located in a FEMA floodplain or a Special Hazard Area. The parcel is in a Zone X, identified as an area of minimal flooding. Although not in a floodplain or floodway, residents in the area have complained about flooding in the area and have presented photographs of this flooding. It appears that in large storm events the roadways in the area flood.

The proposed project does not change current drainage patterns; flow of water on the site and from the site will not change. Per calculations in the Stormwater Pollution Prevention Plan (SWPPP) prepared for this project, the finished ground surface beneath the solar panels/within the proposed perimeter fence will be seeded with a low growing grass that will be mowed at least two-times each year. This change in finished ground cover from woods to meadow results in a slight reduction of stormwater discharge (at peak times) from the site.

There is a stream on the site (Class C) and the project, as laid out, will not be adversely affecting this stream. There is another small drainage swale at the rear of the site (SE corner) that is not classified. This drainageway is being avoided to the maximum extent practicable, except that it will need to be culverted under the proposed access drive.

The site is shown on the EAF Mapper as potentially being over a principal Aquifer. The construction of solar panels will not create large areas of impervious surfaces and the project construction does not involve deep excavations or water withdrawals.

Based on the above, the project will not result in any significant adverse impacts to Water Resources.

Impact on Plants and Animals

The IPaC report run by the applicant's subconsultant and the NYSDEC ERM lists potential presence of northern long-eared bat (NLEB) (federally and NYS threatened), bald eagle (federally protected and NYS threatened), northern harrier (NYS threatened and NYSDEC grassland bird at risk species) and the Indiana bat.

Further work was done to determine if these species are present and if the solar development of the site would impact these species. If the habitat for the bat is found, the applicant will limit tree removal to the NYSDEC designated times (the applicant is meeting these timeframe restrictions).

The results of this additional work performed by the applicant's consultant and coordination with Regulatory Agencies is included as an attachment. This work has documented, with the limitations on the timing of clearing, that these species will not be impacted.

At the request of the Planning Board, the applicant has also agreed to plant "pollinator species" (meadow wildflower milkweed habitat) in areas of the site.

To reduce potential impacts from invasive species, the contractor will follow recommended controls (washing of equipment and the quick establishment of vegetation in disturbed areas) for reducing potential invasive species entering the site.

Based on the above, the project will not result in any significant adverse impacts to Plants and Animals.

Impact on Historic and Archaeological Resources

In Part 2 of the FEAF, the impact box was checked "No", as the EAF Mapper identified no historic or archaeological resources in this area. Based on a submittal to CRIS though, further work was performed.

Through our desktop assessment of the site through the Cultural Resource Information System (CRIS), it has been learned that the site is not within an Archeologically Sensitive Area, which is a buffer area around a recorded archaeological resource. However, it is to be noted that locations outside of these buffer areas may still be archaeologically sensitive, so additional review is often warranted. The desktop CRIS review also did not identify any historic buildings or structures near the site. The project was submitted for consultation to NYS Parks Office of Historic Preservation (SHPO) through their CRIS system, and no further action is needed for archaeological.

SHPO has established guidance for the assessment of historic and cultural resources associated with the development of ground-mounted solar facility projects. As a first step, SHPO requests a GIS analysis to establish a Zone of Visual Impact (ZVI) that delineates areas that will be able to see the solar field, based on topography. As a second step, SHPO requests a survey of all properties 50-years or older within a half-mile of the established ZVI, conducted by a 36 CFR 61 qualified consultant. The survey will document any properties that meet National Register criteria.

On 10/13/20, SHPO provided a letter of no impact on historic or archaeological resources (copy attached).

Based on the above, the project will not result in any significant adverse impacts to Historic or Archaeological resources.

Impact on Transportation

After construction, the project will generate very little traffic (trips in the magnitude of 1 or 2 per month). During construction, the contractor will provide flagman when appropriate (see responses to comments attached).

Impact on Noise, Odor, and Light

There may be temporary issues with noise during construction. No permanent negative impacts due to noise, odor or light (the panels will not produce glare and no lighting is proposed at the site) will occur.

Impact on Aesthetic Resources

There are no mapped or known federal, state or locally designated scenic or aesthetic resources in the area.

Consistency with Community Character

The project has been shown to not impact any historic structures; it will not create a demand for community services; it will not displace any affordable housing, and will not interfere with the enjoyment of any designated public resource.

The project could be noted as being inconsistent with the scale, character and natural landscape of the area (although zoned correctly for the proposed use). Residents at the front and side of the proposed site are concerned about the project's visual impact on them. The applicant has completed visualizations from the surrounding roadways and the project will only be potentially seen from a couple of locations. In those locations (in accordance with the Town's law and the Planning Board's request), the applicant has provided additional landscaping to help screen the project from these two residences. The applicant has also agreed to reducing the mowed areas and will provide guarantees on the landscaping to ensure the planting material's survival.

Based on the above, the project will not result in any significant adverse impacts on Community character.

Attachments:

Wetlands study
SWPPP/Drainage calculations
Project plans/Landscaping plans
Endangered Species report
No impact letter from NYSOPRHP
Correspondence and Responses to public comments