

**From:** [noreply-pc@apa.ny.gov](mailto:noreply-pc@apa.ny.gov)  
**To:** [APA Regulatory Programs Comments](#)  
**Cc:** [jvansplinter@hotmail.com](mailto:jvansplinter@hotmail.com)  
**Subject:** APA Project 2025-0015 Public Comments  
**Date:** Monday, August 11, 2025 9:49:02 AM

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Please copy "2025-0015, John Charles VanSplinter, [jvansplinter@hotmail.com](mailto:jvansplinter@hotmail.com)" into your message for our reference.

\*\*\*\*\*

Attn: Devan Korn  
Comments from: John Charles VanSplinter  
Email from: [jvansplinter@hotmail.com](mailto:jvansplinter@hotmail.com)  
Address: 47 Reid Street Peru NY 12972  
Re: Agency Project 2025-0015, Catalyze Solar

My Comments:

I am against implementation of this project for the following reasons: 1) project outline does not include information regarding environmentally responsible disposal of panels and auxiliary systems during the life of the site and after its decommissioning. 2) Site plan documentation provided on this site is all but illegible when enlarged enough to see detail. 3) Organization is an entity outside of NYS, and projects of this type should be biased towards in state entities to insure responsiveness to local needs and considerations.

**From:** [noreply-pc@apa.ny.gov](mailto:noreply-pc@apa.ny.gov)  
**To:** [APA Regulatory Programs Comments](#)  
**Cc:** [lorrainetorgesen@gmail.com](mailto:lorrainetorgesen@gmail.com)  
**Subject:** APA Project 2025-0015 Public Comments  
**Date:** Friday, August 1, 2025 9:53:56 AM

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Please copy "2025-0015, Lorraine Torgesen, [lorrainetorgesen@gmail.com](mailto:lorrainetorgesen@gmail.com)" into your message for our reference.

\*\*\*\*\*

Attn: Devan Korn  
Comments from: Lorraine Torgesen  
Email from: [lorrainetorgesen@gmail.com](mailto:lorrainetorgesen@gmail.com)  
Address: 114 MAINE RD Plattsburgh NY 12903  
Re: Agency Project 2025-0015, Catalyze Solar

My Comments:

Considering all the downsides of solar panels and the fact that it will take 35 acres of presumably open space to generate minimal electricity

I submit that it's inefficiencies outweigh its benefits.

In addition, if Catalyze solar is going to be the owner of the property it might limit other sustainable uses in the future that are more in line with the visually important landscapes that the ADK economy depends on.

I would prefer to see solar in the ADK park limited to small private installations on farms and businesses that could offset their own energy costs and sell excess to the grid.

Thank you.

**From:** [noreply-pc@apa.ny.gov](mailto:noreply-pc@apa.ny.gov)  
**To:** [APA Regulatory Programs Comments](#)  
**Cc:** [jpatrickreed50@gmail.com](mailto:jpatrickreed50@gmail.com)  
**Subject:** APA Project 2025-0015 Public Comments  
**Date:** Tuesday, July 29, 2025 8:12:39 AM

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Please copy "2025-0015, Jacob Reed, [jpatrickreed50@gmail.com](mailto:jpatrickreed50@gmail.com)" into your message for our reference.

\*\*\*\*\*

Attn: Devan Korn  
Comments from: Jacob Reed  
Email from: [jpatrickreed50@gmail.com](mailto:jpatrickreed50@gmail.com)  
Address:  
Re: Agency Project 2025-0015, Catalyze Solar

My Comments:

I do not support this project in it's current form. The parcel of land is heavily wooded which sequesters CO2, absorbs rainfall, and provides habitats for wildlife. Constructing this solar array would mean acres of trees cut down which would release the CO2 stored in the soil, increase runoff, and force wildlife to move.



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**Conservation Director  
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Peter Bauer  
**Fundraising  
Coordinator**

**Via Email**

August 5, 2025

Devan Korn  
Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

**Re: Catalyze Solar  
APA Project No. 2025-0015  
NYS Rte 22, Town of AuSable, Clinton County  
Tax Parcels 305-6-1.7 and 315-2-7**

Dear Mr. Korn:

Protect the Adirondacks (PROTECT) appreciates the opportunity to submit comments on the above-referenced application, which involves the proposed construction and operation of a 5.0 MWAC commercial solar generating facility (Project) on approximately 35 acres of land classified as Moderate Intensity Use and Low Intensity Use by the Adirondack Park Land Use and Development Plan Map (the "Project Site").

The proposed Project entails the installation of a large-scale solar array, along with associated infrastructure including an access road, fencing, utility connections, grading, and the clearing of trees. The Project Site comprises undeveloped forestland that slopes gently from south to north and includes a small wetland and stream in the northwestern section. The surrounding landscape consists of forested lands, agricultural fields, and residential areas.

PROTECT recognizes the critical importance of advancing renewable energy development, including solar energy, in New York State. We fully support the deployment of clean energy technologies in the Adirondack Park that help meet climate goals while protecting the Park's ecological integrity. However, it is imperative that such facilities be carefully sited and constructed to avoid undue harm to the Park's unique natural resources. We believe that further information is necessary before the Adirondack Park Agency (APA) can determine whether the Project Site is appropriate for this proposed large-scale development. Additionally, the information submitted indicates that an

**Protect the Adirondacks**

PO Box 48, North Creek, NY 12853 518.251.2700

[www.protectadks.org](http://www.protectadks.org) [info@protectadks.org](mailto:info@protectadks.org)

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incidental take permit may be required from the New York State Department of Environmental Conservation (DEC) before the Project can move forward.

### **Incidental Take Permit/Endangered Species**

Two endangered (Indiana bat (*Myotis sodalist*) and northern long-eared bat (*Myotis septentrionalis*)), one proposed endangered (tricolored bat (*Perimyotis subflavus*)) and one candidate (monarch butterfly (*Danaus Plexippus*)) species were identified as occurring within range of the Project Site through the U.S Fish and Wildlife Service (USFWS) species planning tool. A “*May Effect but not Likely to Adversely Affect*” determination was reached by USFWS for each bat species. In addition, the DEC Environmental Resource Mapper (ERM) identified the northern long-eared bat as having a known occurrence record within the vicinity of the Project Site. Suitable roosting habitat for both northern long-eared bat and Indiana bat has been identified throughout the forested areas of the site.

Under DEC regulations, an incidental take permit is required for any action likely to result in a “take” of an endangered or threatened species. 6 NYCRR § 182.8(a). A “take” includes any action that negatively affects the essential behaviors—such as roosting—of a listed species within occupied habitat. *Id.* §§ 182.2(b), (y), (p), (f).

Because the applicant proposes to clear 22 acres of forested land—areas that may provide roosting habitat—it is critical that a comprehensive, on-the-ground bat survey be conducted to determine the presence of listed species. If the site is found to be used for roosting, the applicant must obtain an incidental take permit from DEC prior to proceeding with construction.

Although the monarch butterfly is currently unlisted, it is a candidate species for future federal listing. The proposed landscaping plan indicates that the seed mix for the area inside the fence will be a pollinator friendly mix of plants that can be used by butterflies for food, habitat and breeding. APA should require the applicant to provide an assessment of the availability of the use of grazing sheep to maintain the vegetation inside the fence, rather than mowing and trimming with mechanical equipment.<sup>1</sup> The maintenance plan should clearly specify that the use of pesticides/herbicides is prohibited throughout the Project Site except with prior written authorization from APA for the control of invasive species.

### **Wetlands**

A wetland delineation of the Project Site was conducted by LaBella Associates on 5/11/2023 and a wetland delineation of the utility easement corridor was conducted on 4/23/24. A 0.09 acre palustrine forested wetland was delineated on the northern portion of the Project Site and a 2.11 acre palustrine scrub-shrub wetland was delineated in the central portion of the easement. A perennial stream, spanning 80 linear feet, was also identified in the northern portion of the Project Site. Wetlands on the subject parcel were investigated by APA during the first pre-application site

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<sup>1</sup> See Considerations for “Grazing-Ready” Solar Facilities Planning for Integration of Sheep available at <https://www.nyserda.ny.gov/PutEnergyToWork/Industry-Energy-Solutions/Agriculture/Agrioltaics>

visit and visually assessed (from off-site) along the easement parcel. PROTECT supports the applicant's proposal to provide a 100-foot buffer for the two delineated wetlands as required by statute.

However, the wetland delineations by LaBella Associates and the pre-application site visit by APA staff were conducted prior to the effective date of new amendments to the Freshwater Wetlands Act (FWA) that took effect on January 1, 2025. There is no evidence in the application materials that the Project Site was assessed for the presence of vernal pools. We recommend the applicant be required to update the wetland delineation and conduct a vernal pool survey during the appropriate seasonal timeframe.

### **Pitch Pine Natural Community**

The DEC ERM also shows that the Project Site is within the vicinity of the Pitch Pine-Heath Barrens natural community, and APA staff has confirmed the presence of pitch pine on the Project Site. The applicant claims that APA determined on the second pre-application site visit that the site had low restoration potential for this natural community, but there is no documentation of this determination. Given the ecological importance of this community type, we urge that documentation of this APA's determination be provided or that the applicant be required to undertake further evaluation of the site's restoration potential or, alternatively, provide a plan for offsetting the loss of this natural community with restoration efforts elsewhere.

### **Climate Change**

The applicant intends to clear all trees from a 22-acre portion of the Project Site to accommodate the solar array. Although the applicant states that the area does not constitute mature forest, and therefore does not warrant a carbon offset analysis, they defer to the APA's judgment on this matter.

Given the scale of forest removal and the cumulative impact of forest loss on carbon sequestration in the Park, we respectfully recommend that APA require the applicant to conduct a carbon offset analysis to quantify and, if necessary, mitigate the Project's impact on climate resilience.

APA should also require the applicant to maintain all vegetation on the Project Site, outside of the 22-acre portion, to ensure that the existing trees and vegetation that currently provide a visual buffer of the Project remain intact.

### **Conclusion**

PROTECT supports the responsible development of renewable energy but urges APA to require:

- A comprehensive bat survey and, if warranted, that an application for an incidental take permit be submitted to DEC;
- An updated wetland assessment to include vernal pools;
- Documentation or reevaluation of pitch pine habitat potential and mitigation or restoration efforts; and
- A carbon offset analysis for the proposed forest clearing.

On behalf of the Board of Directors of PROTECT, please accept our gratitude for the opportunity to share our comments on this proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amato", with a stylized flourish at the end.

Christopher Amato  
Conservation Director and Counsel

**From:** [Rebekah Pierce](#)  
**To:** [APA Regulatory Programs Comments](#)  
**Subject:** Project 2025-0015; Catalyze Solar; Devan Korn  
**Date:** Tuesday, August 12, 2025 9:01:34 AM

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Hi Devan,

I'm a freelance writer and farmer just north of the proposed project site. My husband and I own J&R Pierce Family Farm. I am also the author of the book, "Agri-Energy: Growing Power, Growing Food," which will be published in November 2025. I am writing this comment in support of the planned solar project in Keeseville, NY by Catalyze Solar.

I'm a strong proponent of projects like this for several reasons. For one, it presents a viable income opportunity to the current landowner in terms of lease revenue, as well as (I'm presuming based on past experience) a significant boost to the town in the form of PILOT payments.

Regardless of whether the power produced on this site is kept locally or sent to other locations around the state, solar presents the opportunity for a more diversified and independent national energy system. This is especially important as our imports become more expensive and we make the transition away from our aging fossil fuel infrastructure (which has become increasingly costly and unreliable).

I'm sure one of the main pieces of opposition this project will get has to do with impacts to viewsheds, or perhaps taking forestland or agricultural land out of production. Indeed, I read a letter from Protect the Adirondacks that stated just that, emphasizing that while they support the "critical importance of advancing renewable energy development," there are concerns about impacts to the environment.

There are a few things to unpack here. In that letter, Protect the Adirondacks specifically calls out the monarch butterfly as a species of concern. When solar is developed properly, and with pollinator species in mind (generally through the selection of appropriate plant species for vegetation reestablishment post-construction) pollinator numbers have actually been shown to thrive on solar.

We have seen this anecdotally on solar sites that we graze, and a variety of studies (including those published in Scientific American and by the Pollinator Partnership) have demonstrated dramatic increases to pollinator populations post-solar



construction.

Again, there needs to be attention paid to what's planted after construction and how it's maintained, but let's not forget that corn (which is the predominant agricultural crop in our region) is wind-pollinated and does nothing to support pollinator populations (yet there's seldom any published concern about that, despite the fact that more than 40% of the corn grown in the United States is for ethanol production, which is far less efficient than solar).

Adding grazing or even just treating the site as a pollinator-friendly one with reduced mowing can keep vegetation in check for improved panel production while also allowing pollinators (and other types of wildlife, including ground nesting birds and small mammals) to thrive. Again, studies back this up (happy to supply them if need be), as does our lived experience grazing animals on solar.

I highly recommend that this site be allowed to proceed, especially if provisions for grazing or other forms of agrivoltaics are made. Solar grazing with sheep opens up a viable revenue stream for young, first generation farmers in New York (like myself) who simply cannot afford to purchase farmland otherwise.

Rotational grazing on these sites not only improves soil health (studies have shown that soil health on solar managed in this way not only remains the same, but improves, with increases in topsoil, fertility, and moisture retention along with decreased erosion) but also allows for future agricultural use of the land should the solar project cease to exist.

It doesn't have to be sheep that graze the site, either, to get the best land-use scenario. Cattle, vegetable crops, and even hay are produced around the world on solar sites. Again, there are multiple studies to back this up, and I'm happy to connect you with folks who are doing this in real time if you are so inclined.

I'm tired of the argument that solar should not be placed on "prime farmland" or "prime forestland" because very few people who make that argument can actually tell what either of those environments looks like just from looking at it. Just because a forest is standing doesn't necessarily mean its stands are healthy.

Just because a field is planted into corn doesn't mean the soil isn't grossly eroded and contaminated with fertilizer residues and heavy metals. All farmland is not prime farmland, but it could become quality land with the right agricultural and development practices.

There is no good argument against solar (especially when properly managed in the

methods I've described above) from an ecological, environmental, or economic perspective, unless you are solely concerned about viewsheds. To that end, I think it's time to stop outsourcing our energy needs and deal with the fact that if we want to have reliable, affordable electricity, we need to have these installations in our communities.

By choosing solar, you're choosing an income source that will allow (ideally) farmers to continue to farm, lower energy prices, and increase local tax revenue. As an Adirondack native, I'm well aware that we are very collectively concerned about solar in the Adirondacks because we are afraid it will threaten the nature of the park, and prevent it from fulfilling its "Forever Wild" manifest.

While I agree that portions of the park need to remain protected, the reality is that the Adirondacks have become a place that is very challenging for young families to build a life in. I don't own land in the Adirondacks because my husband and I (also from the Adirondacks) cannot afford it, and there's little opportunity for us to build our business there.

That's not to say the Adirondacks should be plastered in development, but I think it's important to take a step back and remember that there's seldom this much opposition to a new storage barn, a Dollar General, or a housing development.

That kind of development not only takes land out of production for good (Dollar Generals don't have decommissioning plans, as solar companies are required to), but provides far less of a benefit to the local economy. Again, there's no opportunity to further enhance and improve the land with agriculture as there is under solar, either.

We need solar (ideally, dual use solar, as described above) to help our rural economy thrive and diversify. I make my case as a farmer hoping to leverage dual-use on a solar site, but I would likely be in support of this project even if that were not the case.

Thank you very much for your time and attention to this, and please feel free to reach out to me directly if you have further questions or concerns.

--

Best,  
Rebekah Pierce  
J&R Pierce Family Farm  
(518) 536-2606  
[rebekah@jrpiercefarm.com](mailto:rebekah@jrpiercefarm.com)  
[www.jrpiercefarm.com](http://www.jrpiercefarm.com)

**From:** [noreply-pc@apa.ny.gov](mailto:noreply-pc@apa.ny.gov)  
**To:** [APA Regulatory Programs Comments](#)  
**Cc:** [stephaniekiyak@hotmail.com](mailto:stephaniekiyak@hotmail.com)  
**Subject:** APA Project 2025-0015 Public Comments  
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Attn: Devan Korn  
Comments from: stephanie kiyak  
Email from: [stephaniekiyak@hotmail.com](mailto:stephaniekiyak@hotmail.com)  
Address:  
Re: Agency Project 2025-0015, Catalyze Solar

My Comments:

Any solar projects helps move us in a more environmentally friendly direction for energy use. This project has my vote for yes, please proceed!

**From:** [Rickie Barber](#)  
**To:** [APA Regulatory Programs Comments](#)  
**Subject:** Apa project no. 2025-0015  
**Date:** Wednesday, August 13, 2025 11:32:40 AM

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In addition to my previous comments we are concerned and want to know the extent of the noise generated by the solar farm. How does this affect our comfort and general way of life. Not to mention the possibility of health effects both long and short term. We will be awaiting these test results. Also the wildlife impact as many deer and other animals access Southwick brook. Will they be cut off? Last but not least Will be the impact on our property value. How will this hurt that? From our understanding the town has offered other sights that would be much more suitable regarding all the impact possibilities. We will be looking forward to these assessments. Thank you.

**From:** [Rickie Barber](#)  
**To:** [APA Regulatory Programs Comments](#)  
**Subject:** APA project no. 2025-0015  
**Date:** Monday, February 3, 2025 9:30:18 PM

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Good Evening,

We are landowners of parcel 315.2-6 adjacent to the above listed project.

Our concerns are as follows:

We are concerned with the proposed access road- how close to our property, the access off Route 22 and the added traffic on the road from this access. Potential flooding onto our property in the spring of the year. Wondering why access is not off Grove street. The town waterline that supplies our water also runs along Route 22 on the access side. Hopefully there will be consideration to how close this access road will be from our property. Have more questions. I look forward to hearing from you.

Thanks,

Rickie and Patti Barber.