

*** Via Email ***


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January 31, 2019

James E. Quigley 3rd
Supervisor
Town of Ulster
1 Town Hall Drive
Lake Katrine, NY 12449

RECEIVED

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B. 
Ulster Town Clerk's Office

**Re: Lincoln Park Grid Support Center
Revised Project Description, Amended Site Plan and Amended Full EAF Part 1
Request for Reconsideration of SEQRA Positive Declaration**

Dear Supervisor Quigley and Members of the Town of Ulster Town Board:

As discussed in the Final Scoping Document, Lincoln Park DG LLC (the “Applicant”), reviewed alternatives to the proposed Lincoln Park Grid Support Center (the “Project”), and has determined that i) the objective of the Project can be achieved using an alternative, battery-only facility design and ii) that the location of the Project can be adjusted within the subject parcel. These adjustments consider comments we have received from the public and other stakeholders as well as recent changes in state energy policy. The Applicant believes that revising the Project to incorporate these Project modifications eliminates any significant adverse impacts of the Project without materially impacting the Applicant’s ability to achieve Project objectives. Attached to this letter is an amended Site Concept Plan, an amended Full EAF Part 1, a comparison of the Project, as reflected in these amended documents, to the previous application, and a map showing the original location of the Project and the newly amended location.

In summary, this revised design includes a reconfiguration of the Project’s generation technology from a hybrid configuration using natural gas fired reciprocating engines and utility-scale batteries (with the ability to generate using diesel fuel stored on-site) to a configuration using only batteries. Incidental changes resulting from this new configuration include removal of the exhaust stack-pair from the design, removal of the powerhouse and associated ancillary facilities, removal of the gas supply and diesel fuel storage infrastructure, and an approximate eight-fold increase in the installed battery capacity with the batteries installed in purpose-built enclosures rather than prefabricated containers. In addition, the Project footprint has been relocated approximately 1,000 feet northeast of the previously described location and is now located on northeast side of Frank Sottile Boulevard (see attached map).

On February 1, 2018 the Town of Ulster Town Board (the “Town Board”) acting as Lead Agency pursuant to the New York State Environmental Quality Review Act (“SEQRA”) issued a Positive Declaration based on the potential for significant environmental impacts resulting from the construction and operation of the

Project (the “Positive Declaration”). The implementation of the changes described herein eliminates or significantly reduce the likelihood for all the potentially significant impacts identified in the Full EAF Part 2 that formed the basis for the Positive Declaration including, but not limited to;

- Emissions of carbon dioxide (CO₂) from the Project are not expected to exceed 1000 tons/year¹ and
- State air registration will not be required, the Project is not expected to exceed an emissions rate of total contaminants of 5 lbs. per hour, and the Project will not include a heat source capable of producing more than 10 million BTUs per hour².

The Applicant hereby requests that the Town Board reconsider the Positive Declaration based on the amended Project materials provided herein.

The Applicant believes that the Town Board, members of the public, and other interested stakeholders likely have significant interest in and questions about the details of the changes to the Project that are reflected in the enclosed materials and, to assist in communicating these changes, the Applicant will, at the Town Board’s request:

- Present to the Town Board an overview of these changes at its regularly scheduled February 7, 2019 meeting,
- Host an informal Public Open House for interested members of the public to meet with representatives of the Applicant and learn more about the Project. The Applicant will provide details of the event (date, time, and location) at least three (3) weeks before the open house via written notice to the Town Board, postcard mailings to surrounding property owners, and by posting an announcement on the Project’s website,
- Continue to provide information to the public on the Project’s website as well continue to maintain a publicly available email address and local telephone number for members of the public to contact the Applicant with questions,
- Present to the Town Planning Board an overview of these changes during a regularly scheduled meeting, and
- Prepare and provide other materials the Town Board, Town Planner, and/or Town Planning Board may reasonably request.

As always, updates on the Project can be found at the Project’s website, www.LincolnParkGridSupportCenter.com, and questions or comments can be directed to the Applicant via email at LincolnPark@glidepath.net or telephone at (845) 481-0030. We look forward to continuing to work with the Town of Ulster, community members, and other stakeholders on this Project.

Sincerely,



Peter Rood
Chief Development Officer
GlidePath Power Solutions LLC

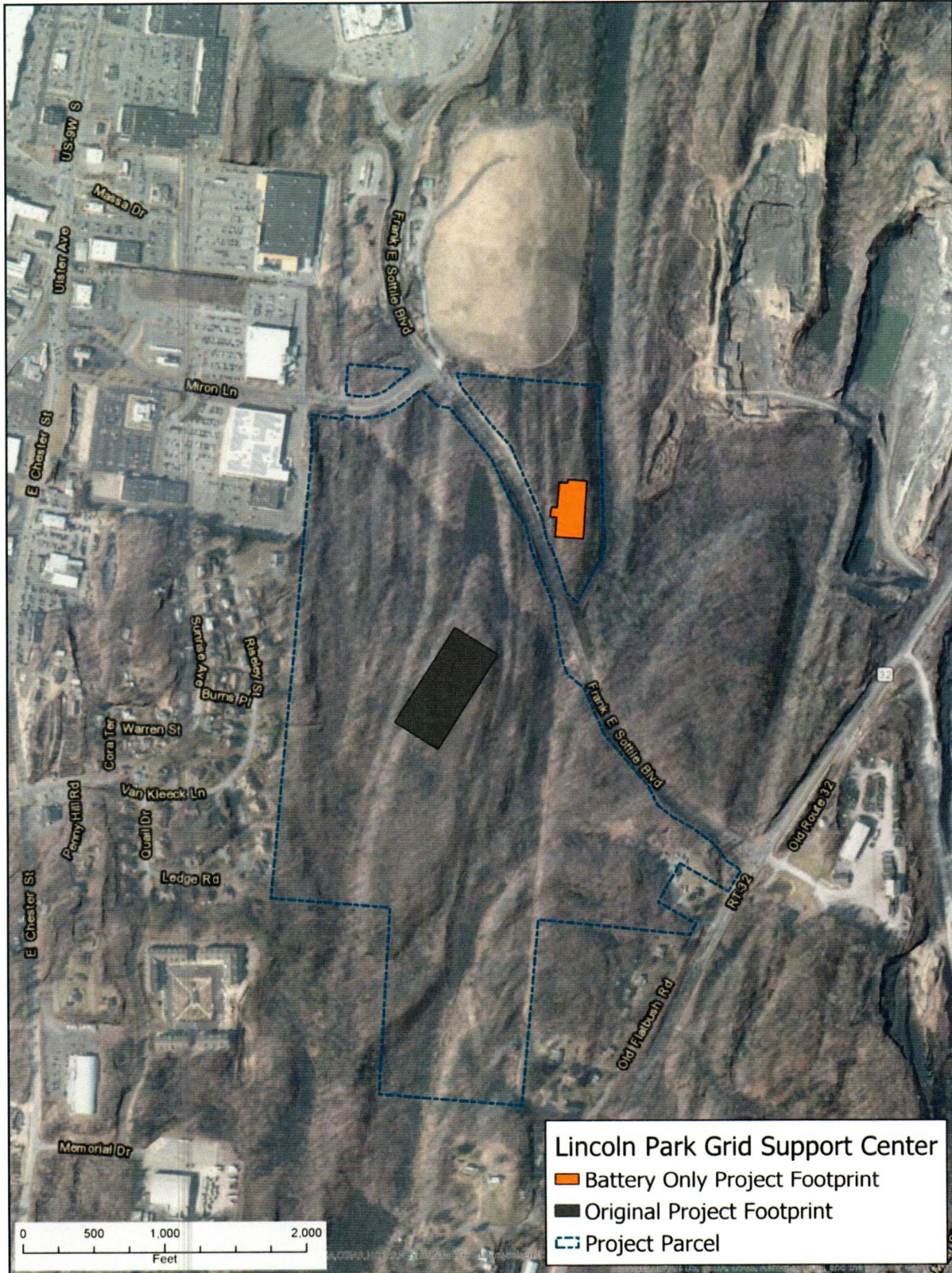
Enclosures

¹ Full EAF Part 2 §6.a.i

² Full EAF Part 2 §6.c

Lincoln Park Grid Support Center

Amended Project Location (Conceptual)



**LINCOLN PARK GRID SUPPORT CENTER (LPGSC)
STATE ENVIRONMENTAL QUALITY REVIEW
COMPARISON OF POTENTIAL ENVIRONMENTAL IMPACTS
ORIGINAL PROJECT VS REVISED PROJECT**

| POTENTIAL IMPACT PROJECT DESCRIPTION | ORIGINAL PROJECT | REVISED PROJECT | CHANGE |
|---|---|--|--|
| <p>Comparison of project description for original project and revised project</p> | <ul style="list-style-type: none"> ○ Natural gas-fired plant ○ Reciprocating engine generator system (two combustion engines) in 40-foot-tall (9,145 square feet (SF)) steel Butler building ○ Substation ○ Central Hudson Gas & Electric (CHG&E) transmission infrastructure ○ Underground gas connection ○ 80-foot high exhaust stacks (2) ○ Operation 6 to 14 hours per day ○ Ultra low-sulfur diesel storage tank for fuel back up system ○ Cooling equipment ○ Reagent storage tanks ○ Transformers ○ Water supply well or water line extension ○ Subsurface drainage system ○ Office for ≤ 4 employees ○ 20 megawatt (MW) 9-11 containerized battery systems ○ 5-10 megawatt hours (MWh) combined battery system capacity ○ 24-hour operation ○ 8-10 inverter pads ○ Access area and drive ○ Stormwater management facility | <ul style="list-style-type: none"> ○ 20 MW battery array within a < 35-foot-tall 30,000 SF building ○ 25,000 battery modules with a combined capacity of approximately 80 MWh ○ 8-10 inverter pads ○ Cooling equipment ○ CHG&E Structure, transformer, grid connection infrastructure ○ 24-hour operation ○ Unmanned ○ Access area and driveway ○ Stormwater management facility | <p>Project significantly reduced in scale.</p> |

| POTENTIAL IMPACT | ORIGINAL PROJECT | REVISED PROJECT | CHANGE |
|--|--|--|--|
| REQUIRED APPROVALS/PERMITS | | | |
| Comparison of approvals/permits required | <ul style="list-style-type: none"> ○ Town Board for Site Plan and possible approval of Out-of-District water line extension agreement ○ Planning Board for advisory opinion to Town Board, lot consolidation, MS4 acceptance ○ Ulster County Department of Health (UCDOH) for possible water supply well and Subsurface drainage system design approval, possible waterline extension ○ Ulster County Department of Public Works (UCDPW) for Highway Work Permit ○ Ulster County Industrial Development Agency (UCIDA) for Payment-in-Lieu-of-Taxes (PILOT) agreement ○ Ulster County Planning Board (UCPB) for 239m review ○ New York State Department of Environmental Conservation (NYSDEC) for minor source air permit, bulk petroleum storage registration, waste oil storage, GP-0-15-002, consultation on regulated species, section 401 water quality certificate ○ New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP) for Consultation on Historic and Cultural Resources ○ United States Army Corps of Engineers (USACE) Nationwide Permit ○ United States Fish and Wildlife Service (USFWS) Consultation on regulated species ○ New York State Public Service Commission (NYSpsc) for transmission connection | <ul style="list-style-type: none"> ○ Town Board for Site Plan ○ Planning Board for advisory opinion on site plan, lot consolidation, MS4 acceptance ○ UCDPW for driveway approval, highway work permit ○ UCIDA for PILOT agreement ○ UCPB for 239m review ○ NYSDEC for GP-0-15-002, Consultation on regulated species ○ NYSOPRHP for Consultation on Historic and Cultural Resources ○ NYSpsc for transmission certificate of public convenience and necessity ○ New York State Energy Research and Development Agency (NYSERDA) for energy storage incentive ○ Federal Energy Regulatory Commission (FERC) for market-based rate authority and exempt wholesale generator status approval | Significant reduction in required permits/approvals and consultations. |
| SOILS AND GEOLOGICAL IMPACTS | | | |

| POTENTIAL IMPACT | ORIGINAL PROJECT | REVISED PROJECT | CHANGE |
|--|--|---|--|
| Cut and fill | 4,622 cubic yards net cut | Project requires less overall ground disturbance and due to simplified project components, the need for cutting is less; therefore, the site will be more balanced for cut and fill quantities. | Reduction in area of disturbance of 3.99 acres. Cut and fill quantities will be more balanced than original project. |
| Impervious | 2.30 acres | 1.39 acres | Reduction in impervious surface of 0.91 acre. |
| Area of disturbance | 5.95 acres | 1.96 acres | Reduction in area of disturbance of 3.99 acres. |
| Slopes analysis | 1.04 acres of the disturbance area have slopes of 15 to 25%, 0.19 acre of disturbance area has slopes of 25% or more. | 0.1 acre of the disturbance area have slopes of 15 to 25%, no disturbance area on slopes of 25% or more. | Reduction in disturbance of areas of slopes >15% to 25% by 0.94 acre. No disturbance area on slopes of 25% or more. |
| Potential for blasting | Project would likely require blasting. | Revised project requires less ground disturbance; therefore, less likely to require blasting. | Reduced potential for blasting. |
| SURFACE WATER AND WETLAND RESOURCES | | | |
| Stormwater | Disturbance of greater than one acre; Stormwater Pollution Prevention Plan (SWPPP) required. Construction of stormwater management facilities to mitigate effects of 2.3 acres of impervious ground cover. | Disturbance of greater than one acre; Stormwater Pollution Prevention Plan (SWPPP) required. Construction of stormwater management facilities to mitigate effects of 1.39 acres of impervious ground cover. | Reduced impervious will result in reduced stormwater and related infrastructure. |
| Wetland/stream impacts | 0.09 acre impact to USACOE wetland for access drive. | No disturbance to wetlands. | No wetland disturbance. |
| GROUNDWATER DEMAND | | | |
| | Operation requires 48 gallons per day. Fire flow needs met through proposed water line extension. | Operation requires no water demand. Fire flow needs met through chemical fire suppression system. Cooling needs met via closed loop system. | The facility will be unmanned; therefore, no water demand will occur and related need for infrastructure (e.g. water well or water line extension) is precluded. Fire prevention will be met through chemical fire suppression system. Cooling needs met via closed loop system. |
| WASTEWATER GENERATION | | | |
| | 48 gallons per day. | No wastewater generation. | The facility will be unmanned; therefore, no wastewater will be generated and related need for infrastructure (e.g. septic system) is precluded. |

| POTENTIAL IMPACT | ORIGINAL PROJECT | REVISED PROJECT | CHANGE |
|---------------------------------|---|--|--|
| VEGETATION AND WILDLIFE | | | |
| Vegetation removal | Clearing of 5.95 acres of forested area. | Clearing of 1.89 acres of forested area. | Reduction in area of disturbance of 4.06 acres. |
| Habitat | Project area contains trees over 3" diameter above breast height (dbh) that could provide summer roosts for Indiana Bat and Northern Long-Eared Bat. Tree removal would be restricted to the period between November 1 and March 31 to avoid impacts to the bat species, as during this time, the bats would be hibernating and not present onsite. | Project area contains trees over 3" dbh that could provide summer roosts for Indiana Bat and Northern Long-Eared Bat. Tree removal would be restricted to the period between November 1 and March 31 to avoid impacts to the bat species, as during this time, the bats would be hibernating and not present onsite. | Reduction in clearing of forested area by 4.06 acres, which would reduce the overall number of potential suitable roost trees that may be removed. |
| Species | No suitable habitat for Bog Turtle. | No suitable habitat for Bog Turtle. | |
| Significant natural communities | Potential for Bog Turtle (Federally threatened, State endangered); Indiana Bat (Federally and State endangered); Northern Long-Eared Bat (Federally and State threatened). | Potential for Bog Turtle (Federally threatened, State endangered); Indiana Bat (Federally and State endangered); Northern Long-Eared Bat (Federally and State threatened). | Overall project site remains unchanged; therefore, no difference between original and revised project. |
| CULTURAL RESOURCES | | | |
| Historic or archeological sites | No National Register of Historic Places or State Register of Historic Places Listed or Eligible resources located on or substantially contiguous to the LPGSC project site. No archeological sites on the LPGSC project area. | No National Register of Historic Places or State Register of Historic Places Listed or Eligible resources located on or substantially contiguous to the LPGSC project site. Precontact remains (15 pieces of lithic debris and two cores) discovered during Phase 1B, Phase 2 underway. | Archaeological resources exist on the LPGSC project site; further testing is being undertaken and will be provided to the Town and NYSOPRHP for review. No significant adverse impacts to archaeological resources are anticipated as the Applicant will work with NYSOPRHP to satisfy concerns and will meet applicable laws and regulations. |
| VISUAL RESOURCES | | | |
| Visual | Project included two 80-foot high exhaust stacks for fuel combustion with the potential for visibility of the plume and/or water vapor. 40-foot tall building compliant with zoning. | No exhaust stacks. 35-foot tall (or less) building compliant with zoning. | Reduced visual impact by removal of power generation infrastructure. |
| TRAFFIC | | | |

| POTENTIAL IMPACT | ORIGINAL PROJECT | REVISED PROJECT | CHANGE |
|-----------------------------------|---|--|--|
| Trip generation | Based on a maximum of 4 employees anticipated <ul style="list-style-type: none"> • 4 am peak hour trips, • 4 pm peak hour trips anticipated • 1 fuel truck delivery per day. | No dedicated on-site personnel. | Elimination of daily employee traffic and fuel truck delivery traffic. |
| Sight distances | Measured sight distance (looking right) less than American Association of State Highway and Transportation Officials (AASHTO) desired intersection sight distance. Sight distance (looking right) exceeds required stopping distance; therefore, the available distance would not be critically limited. | Sight distances are met for AASHTO desired intersection sight distance and the County's required stopping distance. | Project meets AASHTO desired intersection sight distance and the County's required stopping distance. |
| Construction traffic | Traffic generation during construction includes employees and construction equipment. | Traffic generation during construction includes employees and construction equipment. | Reduction in area of disturbance of 3.99 acres and reduction in scale of project. Therefore, reduction in construction employees and equipment and construction traffic. |
| LAND USE AND ZONING | | | |
| | Office-Manufacturing (OM) Zoning District; LPGSC is permitted use as "public utility." Surrounding uses include other industrial uses including a closed landfill with an above-grade solar array, a solid waste facility, gas measuring station and a mine/quarry. | OM Zoning District; LPGSC is permitted use as "public utility." Surrounding uses include other industrial uses including a closed landfill with an above-grade solar array, a solid waste facility, gas measuring station and a mine/quarry. | Intensity and scale of revised LPGSC is reduced and will continue to be consistent with land use and zoning. |
| HAZARDOUS MATERIALS | | | |
| Waste lubricating oil and reagent | A small amount of these products would be required including storage facilities. | These are not required for the current project. | Elimination of waste lubricating oil and reagent and storage facilities. |
| Bulk petroleum storage | 50,000-gallon bulk petroleum above-ground storage tank for diesel fuel. | No bulk petroleum storage is needed for current project. | Elimination of bulk petroleum storage. |
| Hazardous materials | Lube oil and glycol wastes generated would be pumped out and removed from the site by a specialized recycling and disposal contractor. Battery stability system would be constructed and operated according to applicable codes and regulations, and external spill containment is not necessary as the technology is equipped with an internal containment system. | Battery stability system would be constructed and operated according to applicable codes and regulations, and external spill containment is not necessary as the technology is equipped with an internal containment system. Glycol waste to be disposed of by specialized recycling and disposal contractor off-site at approved disposal facility. | Elimination of lube oil waste. |

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|---|--|--|--|
| Comprehensive Spill Prevention, Control and Countermeasures (SPCC) Plan | A Comprehensive Spill Prevention, Control, and Countermeasures (SPCC) Plan was required to minimize the potential for any spills, and to contain and respond to impacts of any spills that occur. | No SPCC Plan required as there are no hazardous materials requiring external spill containment. | Need for a SPCC Plan is eliminated. |
| AIR RESOURCES | | | |
| Air emissions | NYSDEC minor source air permit required for primary emissions of carbon dioxide (CO2), nitrogen oxides (NOX), and carbon monoxide (CO), plus minor emissions from the diesel fire pump and fuel gas heater, if required. | Project requires no fuel combustion or exhaust stacks and will not result in any emissions. No air permits required. | Elimination of the need for air permits. |
| NOISE | | | |
| Construction activities | Temporary noise above local ambient levels would occur during construction activities, which will be limited to the hours of 7:00 am to 9:00 pm on Monday thru Saturday. | Temporary noise above local ambient levels would occur during construction activities, which will be limited to the hours of 7:00 am to 9:00 pm on Monday thru Saturday. | Reduction in area of disturbance of 3.99 acres and reduction in project scale. Therefore, reduction in construction employees and equipment, construction traffic and related temporary noise effects. LPGSC will located further from residences. |
| Operation | The operation of the facility would generate noise above local ambient noise levels. Nearest residence is 725 feet from LPGSC site. | Project will emit minimal noise from the inverters and cooling system. Nearest residence is 1,450 feet from LPGSC site. | Minimal operational noise. |
| ODOR | | | |
| | Intermittent fugitive odors may occur during loading of diesel, lube oil, and reagent storage tanks. | No odors will be produced by the project. | Elimination of odors and need for odor-reducing equipment |

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| ODOR | Intermittent fugitive odors may occur during loading of diesel, lube oil, and reagent storage tanks. | No odors will be produced by the project. | Elimination of odors and need for odor-reducing equipment |