

TRACY

solar & storage project

Community Engagement Plan Table of Contents

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Introduction

The Tracy Solar project is proud to operate in a state that places paramount importance on climate and communities. Throughout the life of the project, Tracy Solar will set goals and act within the guidelines of New York’s nation-leading climate legislation, the Climate Leadership and Community Protection Act (CLCPA), including delivering benefits to disadvantaged communities. The outcomes envisioned by this Community Engagement Plan offer a thoughtful approach to building community support while respectfully responding to interests throughout the project.

Tracy Solar recognizes and appreciates that local governments and stakeholders including landowners, play an important role in the process of evaluating and advancing large scale renewable siting in New York State, and in shaping developments that may be permitted in their communities. Tracy Solar asserts responsibility for implementing the following Community Engagement Plan, that supports an open and inclusive public process and encourages feedback throughout the development and construction of the proposed solar project.

This includes regionally targeted education and information campaigns and encourages an open exchange with residents, businesses, and community groups where our projects are located. Throughout the development, construction, and operational phases of the proposed facility, Tracy Solar’s efforts to understand and embrace local priorities and interests will ensure that the benefits provided, economic or otherwise, are aligned with community needs.

The following plan incorporates an understanding of local interests and concerns, provides valuable public education opportunities, demonstrates a commitment to partnering with host communities, and details a plan to respectfully respond to interests and prompt input from the public and affected agencies.

1. Local Authorities Having Jurisdiction (AHJ)

<p>Authorities Having Jurisdiction (AHJ)</p>	<p>Town of Clayton Town of Orleans Town of Orleans Highway Department Town of Clayton Highway Department Jefferson County Highway Department</p>
<p>Taxing School District</p>	<p>Lafargeville Central School District</p>
<p>Local Elected Officials Name(s), Contact Information, and Tenure</p>	<p>Town of Clayton Supervisor-Tim Doney townsupervisor@townofclayton.com (315) 686-3512</p> <p>Town of Orleans Supervisor- Kevin Rarick Phone: 315-658-9950 Fax: 315-658-2513</p>

Alignment to Comprehensive Planning Efforts

In 2022, the town of Clayton adopted an updated Comprehensive Plan to outline future goals and directions of the local community. Tracy Solar Energy Center is proud to align with the comprehensive plan through maximizing development while assisting in local infrastructure stability through annual revenues paid as well as preserving open space through a temporary land use that sets to preserve and protect soils. In 2018, the town of Orleans saw updates emphasizing road corridors which the stability of revenues gained to special districts throughout the project's life, will provide long-term stability for municipal and county roads. Tracy Solar believes it is important to read through the community's comprehensive plan to guide partnerships and donations in meaningful ways to the local community.

2. Community Outreach Strategies and Activities to Date



Overview of Commitment To Clean Energy Development: Tracy Solar recognizes that grid-scale solar projects are a relatively new concept throughout the state of New York, and is committed to educating local officials, landowners, neighbors, and the community at large about the technology, impacts, and benefits of solar energy. Through its efforts in following the Article 10 and Section 94-c permitting processes, Tracy Solar has shown a commitment to engaging with its projects’ host community residents, neighbors, businesses, government leaders, and community groups to ensure an open exchange of ideas and transparency about the projects.

Often, a lack of information can create confusion about a project. By sharing project details, including mitigation measures and permitting constraints, more meaningful dialog can take place. More importantly, receiving input from the community early in the development cycle uncovers critical information that can be used to help craft a project in ways that help maximize support from the community-at-large. The exercise of sharing information, receiving, and responding to feedback helps to realize a project with the community in mind. Tracy Solar is committed to distributing project information in a variety of manners that may best suit a wide array of stakeholders

TRACY SOLAR COMMUNITY OVERVIEW

Located in the North Country, Jefferson County, the Tracy Community reflects that of several groups. Namely, the towns of Clayton and Orleans serves as a gateway to the St. Lawrence River and 1000 Island areas. Meanwhile, much of the area is both rural and reflective of the mountainous outdoors economy of the North Country region. Thus the community prioritizes its local ecosystem, in which Tracy Solar will reflect these values. The Tracy Solar project touches one k-12 district, the Lafargeville Central School district.

Tracy Solar Outreach to Date

During the covid pandemic time, Tracy Solar hosted much of its public involvement and stakeholder engagement times to keep members of the public safe.

In compliance with 19 NYCRR Section 900-12.3 (a) Tracy Solar met with the towns of Clayton and Orleans at the Clayton Opera House on February 25, 2021. Tracy Solar provided the slide deck to municipal stakeholders in advance of the meeting and during the meeting site details and project next steps were discussed in detail with input from the towns to be incorporated.

During Spring of 2021, Tracy Solar worked with municipal stakeholders to discuss local laws and met with Jefferson County government stakeholders to share important project status and benefits. And through the Summer of 2021, Tracy worked with the towns on visual simulation points and packages.

Historically, the Tracy Solar public involvement program plan for the Article 10 process, as well as Exhibit 2, Overview and Public Involvement of the Office of Renewable Energy Siting 94c siting process, can be found on NYS Department of Public Service Document Matter Master. Please relevant documentation for Tracy Solar [NYS DPS-DMM: Matter Master](#)

Tracy Solar completed necessary permitting activities in 2021 and 2022 and received determination of completeness from the Office of Renewable Energy Siting in 2023, allowing for construction in late 2025-2026 and operations to begin by 2027.

During the operational phase of the project, relationships with the community are managed by Tracy Solar's asset optimization team, local site manager, and land and community engagement team. The primary focus of the community relationships moving ahead will be educational and partnership opportunities, ensuring the project is operating safely, and maintaining the requirements of our permits (for example vegetative buffering for visual impact). Refresher training for first responders and emergency personnel will be held as needed and opportunities for field trips or educational seminars available for local students.

Overall, Tracy Solar is committed to a thorough community engagement program, listening to neighbors, and providing the information and resources necessary to help inform them about solar energy and the Project, so the project and its benefits are successfully integrated into the community for years to come.

3. Direct Benefits to the Community

The project team at Tracy Solar and many community members are excited to see the project be realized, as it will provide many benefits for the community, including:

- Approximately \$15 million in new revenues over twenty years basis for the town, county and school districts.
- More than \$800,000 annually in landowner payments.
- \$59,500 per year in residential electricity bill credits (for the first 10 years of operation), applied directly to residents of Clayton and Orleans' annual electric bills.

- \$30,000 annual Share the Sun Fund community benefit fund (during construction and for the first 10 years of operation) to help support local organizations, in addition to any host community agreements or PILOT payments.
- Other benefits including jobs during construction and operation, and opportunities for material supply and services and opportunities for the hospitality sector.
- \$2,000 annual scholarship to the Lafargeville School District with for students interested to pursuing a post-secondary program in the trades or has a renewable energy component, with the option for a second-year renewal for the recipients.
- Some of the above-mentioned investments are anticipated to benefit disadvantaged communities in the North Country region as well as the 41% of households in the town of Clayton and 42.1% of households in the town of Orleans that fall within the 0-60% state income level threshold for disadvantaged community criteria.

The Tracy solar project represents a significant investment in the local towns, county, and the state of New York. The project would rank among the largest, by investment, in the Towns of Clayton and Orleans. The project also shows alignment with the CLCPA and this solicitation's stated prioritization of benefits, including job creation and support for disadvantaged communities. The project will help grow and support New York's burgeoning renewable energy supply chains and workforce.

In addition to the category of alignment with the CLCPA, investments in the community fall into three primary categories:

- *Job Creation*: Includes temporary construction jobs and long-term jobs for the life of the facility.
- *Contribution in Taxes and Revenues*: Includes income from PILOT's and/or Host Community Agreements, special district taxes, taxes on underlying land and agricultural exemption conversion penalties.
- *Direct Economic Benefits*: The initial spending on the construction and operation of the photovoltaic (PV) installation creates a second layer of impacts, referred to as "supply chain impacts" or "indirect impacts." Indirect impacts during the construction period consist of the changes in inter-industry purchases resulting from the direct final demand changes and include construction spending on materials and PV equipment and other purchases of goods and offsite services. Focusing on local or in-state indirect benefits, we see the greatest impact in the hospitality, material supply, and construction services sectors.

Alignment with the CLCPA

The Tracy Solar project contributes to New York State's goal of 70% renewable energy by 2030, through reducing emissions associated with power production by providing a renewable energy resource. Tracy Solar commits to other goals of the CLCPA such as a Just Transition, by partnering with community organizations to offer localized benefits to the most vulnerable populations in project communities.

Tracy Solar's efforts to bring clean energy to New York are not only aligned with the goals of the CLCPA, but also with NYSERDA's five core mission outcomes which are greenhouse gas emissions reductions, driving steady and reliable procurements of renewable energy, driving energy efficiency and building

decarbonization, building New York’s clean energy economy, and aligning infrastructure, investment, and energy system planning to create a resilient and distributed energy system.

To ensure these benefits are integrated into project communities, Tracy Solar believes in creating longstanding partnerships with organizations like local school districts and higher education institutions, BOCES, community groups like Veterans of Foreign Wars or Boys/Girls Scouts, food pantries, county and regional program partners like workforce development boards and NYSERDA Clean Energy Community Coordinators or Clean Energy Hubs.

Looking at the larger picture of upstate New York, Tracy Solar will also have a positive impact on the cities and regions the project is near, including Watertown, Syracuse, and the Adirondack North Country area, each of which include significant disadvantaged communities. Tracy Solar is committed to helping to grow a connected and growing renewable energy supply chain, while developing a skilled local workforce and supporting New York’s nation-leading transition to a renewable energy future.

Economic Development/Local Job Creation: Tracy

Jefferson County has an unemployment rate of 4.3% as of May 2024 ¹. The job creation from the project construction will provide contracted work to local workforces for a secured timeline. The Tracy Solar Energy Center is proposed to contribute over \$15 million in direct payments, averaging more than \$750,000 per year, to the towns of Clayton and Orleans, Jefferson County, and host school districts in the first 20 years of operation. This value includes PILOT and/or Host Community Agreements, special district taxes, taxes on underlying land, and agricultural exemption conversion penalties.

More than 170 union jobs will be created at the peak of construction, and 2-3 full-time, high-paying jobs for its 35+ year operating life. In addition, this will provide much needed training opportunities, setting individuals up for a career in one of the fastest growing industries of the future.

Contributions to local Revenues and Direct Economic Benefits

While this Community Engagement Plan provides an overview of the significant localized contributions for the Tracy Solar community, the economic benefits sections of this solicitation cover the direct benefits in detail. With a fervent commitment to project communities, Tracy Solar exceeds the base level expectations of benefits a project can bring to a community through listening and responding to needs in real time and bringing the following programs to our communities.

- Share the Sun Fund- \$30,000 annually given to local organizations. The winners are selected after review of their applications by a local review committee for a truly locally driven process.
- \$2,000 Scholarships for students at project school districts interested in renewable energy or the trades
- In person education and outreach events from arts festivals to environmental summits, to school homecomings and county fairs
- Partnerships with local unions such as IBEW, LiUNA and Operators

¹ <https://fred.stlouisfed.org/series/NYJEFFOURN>

4. Benefits to Disadvantaged Communities

Recognizing most of the state's utility scale renewable energy projects are in rural areas, Tracy Solar maintains the NYSERDA March 2023 definition of Disadvantaged communities to adequately address rural poverty, wherein households that fall within the state level threshold may be categorized as members of disadvantaged communities. In addition, recognizing regional impacts of any kind of development, Tracy Solar will work closely with county and regional organizations to create opportunities for nearby disadvantaged communities. Tracy Solar further recognizes some of the biggest burdens are local funding opportunities, workforce development and household energy efficiency.

According to the March 2023, NYSERDA DAC map and additional criteria, the Tracy Solar project would be adjacent to a DAC in Hammond, with nearby DACs in Watertown. Additionally, in the town of Clayton, 41% of households fall within the 0%-60% state income level threshold to qualify as a disadvantaged community member, and for the town of Orleans, that number is 42.1%. In Jefferson County, 9% of parcels fall within designated disadvantaged communities. Thus, the localized impacts of the Tracy Solar Project will greatly impact these members of the community.

Local Funding Opportunities

Tracy Solar Energy Center is dedicating \$30,000 for ten years beginning at the start of construction for the project's Share the Sun Fund community benefit Fund. Often, local nonprofits have a hard time finding funding such as local food pantries and serve the members of communities who are most in need of assistance. Winners of these funds are chosen by a local selection committee.

An annual scholarship of \$2,000 has been established for the Lafargeville Central School District for a student interested in renewable energy or the trades. The project will also provide an opportunity to source construction labor, materials, subcontractors, and vendors directly from this disadvantaged area.

Job Creation and Workforce Development

The Tracy Solar Energy Center will bring much-needed job opportunities not only to the host town, but also to neighboring disadvantaged communities. Construction jobs will offer prevailing wages, hands-on learning, and serve as a starting point to gain relevant knowledge and experience in the fast-growing energy industry. Full time operations jobs will pay an average of [16-19%](#) above the average state level, depending on the position.

There will be approximately 170 jobs created at the peak of construction and 3 additional full-time, high paying operation jobs for the project's 35-year operating life. Tailoring to various job experience levels in the community, there will be jobs available such as laborers, technicians, electricians and construction workers. The Tracy Solar Energy Center will create opportunities in the energy sector, which is a growing field of work because of the state's rigorous renewable energy goals. From 2016 –2018, workforce growth in the energy industry was [8.9%](#) in New York State, which has positively contributed to growth for the economy. It is projected that in the next 10 years solar technician demand by [50%](#) in New York State. These jobs will provide much needed training opportunities, setting individuals up for a future career in an expanding industry.

While the direct contributions made by Tracy solar will focus on the projects host towns, school districts, and the county its proximity to Hammond and Watertown will provide an opportunity to source hospitality, services, construction labor, and materials, subcontractors, and vendors from these disadvantaged communities and community members. Tracy Solar intends to distribute a flyer that highlights the opportunities to pursue a career in renewable energy in the local community.

Local Educational Opportunities

The project will be able to provide well-paying jobs to locals who completed relevant educational programs at such universities as Jefferson County Community College, located in Watertown. Working with this local institution can increase opportunities for underrepresented groups, where underrepresented groups make up at least 26% of the student body and the cost of tuition varies depending on income level.

5. Payments in Lieu of Taxes or Host Community Agreements

The Proposer has discussed Payments in Lieu of Taxes and Host Community Agreements (HCA) at all public meetings including Town Board meetings with the Towns of Clayton and Orleans with the Jefferson County Industrial Development Agency. Tracy Solar held an introductory meeting with the Jefferson County IDA on August 10th, 2021 to understand the overall approach, requirements and process for future discussions. In November 2023, Tracy Solar met with the Jefferson County IDA to discuss general terms for PILOT and host community agreements. Currently, Tracy Solar is working to refine and optimize the design layout for the facility and once finalized, Tracy Solar will utilize it as a basis to continue PILOT discussions with the county IDA and initiate HCA discussions with the Towns. Tracy Solar looks forward to creating new revenue streams for the town, county and school district, that have great potential to benefit the community for the life of the PILOT.

6. Local Interests/Concerns and Mitigation Efforts

Tracy Solar has come to find through its development life, there are two main factors that contribute toward building community support and responding to opposition:

- Providing education about the facility – a lack of information can cause confusion about the project. By sharing project details including mitigation measures and permitting constraints, more meaningful dialog can take place.
- Receiving feedback from the community – more importantly, receiving input from the community early in the development cycle allows for a mutually beneficial flow of information and ideas. .

The exercise of sharing information, receiving, and responding to feedback helps to realize a project with community in mind. Below are specific examples indicating of how informing stakeholders and/or receiving feedback either influenced project decisions or helped build community support at the Tracy Solar Center:

Throughout consultation with local officials, potential impacts to road conditions during construction arose, to mitigate this concern, road use agreements will be established to address such concerns. For

example, Tracy Solar will repair damage to approved haul routes sustained during Facility construction to a condition equal to or better than the roadway's condition prior to construction.

In addition, local laws in Clayton require 16 ft roads, thus Tracy Solar changed the width of its access roads from 20 ft to 16 ft, to reflect the local law requirements and work with the town on the project's design.

Communities also express an interest about how the project might benefit the local towns and schools, and its potential effect on their taxes. The Project through the PILOT and/or Host Community Agreement, special district taxes, taxes on underlying land, agricultural exemption conversion penalties is proposed to contribute more than \$15 million in direct payments to the Towns of Clayton and Orleans, Jefferson County and Lafargeville Central school districts in the first 20 years of operation. In addition, a \$500/MW payment will be made annually to offset residential electricity bills for the first ten years following commercial operation amounting to \$59,500 per year, directly applied annually to residents' electricity bills in the towns of Clayton and Orleans.

Tracy Solar believes it is a strong fit for the local community as the project seeks to foster meaningful relationships that are built to last and be mutually beneficial.

7. Strategies to Mitigate Concerns Raised by the Public

Comments addressed during 94c State Permitting Process

The following topics regarding the Tracy Solar project arose during the state 94c permitting process:

(1) socioeconomic effects associated with the host community benefits and statements of the Permittee concerning a local scholarship and local construction expenditures;

Tracy Solar will offer more than \$15 million in new revenues to the host towns, county and school district. Given the % of households that fall within the NYSERDA DAC threshold (41% and 42.1%) this additional revenue will greatly benefit the members of the Clayton and Orleans communities. An annual \$2,000 scholarship has been granted to a graduating senior from Lafargeville CSD, since 2021, and will continue to do so through ten years after start of construction. Tracy Solar will create a local construction services booklet to emphasize local businesses from hospitality to goods and services.

(2) the alleged negative impacts of the project to the Perch Lake Complex Important Bird Area;

Tracy Solar completed comprehensive environmental studies including impact to wetlands and wildlife, which can be detailed in the state 94c permitting application. In summary, no impacts to sensitive bird species were found. Tracy Solar continues to work with and donate to local environmental organizations as we understand the value of the outdoors for the gateway to the 1000 Islands community.

(3) a proposed condition that the Permittee provide equitable and local mitigation for environmental, agricultural, biological, and societal impacts of the Facility and other solar facility projects in the surrounding community and region; and

Tracy Solar has and will continue to work with local groups on agricultural, environmental and societal benefits for the area and region. Some local and regional groups Tracy Solar will continue to work with to

benefit the local community are Save the River, Adirondack North Country Association, and the North Country Cornell Cooperative Extension.

(4) previous statements by the Permittee to follow the Clayton Solar Law, and the proposed Facility's incompatibility with the Clayton Solar Law and the community's comprehensive plan.

As shown in the previous section, Tracy Solar worked with the town of Clayton to reflect road sizes and will continue to work with the host municipalities as the Tracy Solar project should near final design and compliance filing stages. The Tracy Solar project is proud to align with both the Clayton and Orleans Comprehensive plans in just a few of the following ways:

Clayton

- **Pursue funding sources for public utilities and parks projects consistent with community priorities.** Tracy Solar will offer over \$15 Million split between the host town, county and school districts over twenty years. These additional revenues provide a long term revenue stream that municipalities can plan to use as a funding source for capital investment projects should the municipality choose to do so.
- **Continue to educate the public about year-round recreation opportunities in the town and village, including winter activities and resources and explore and promote the many ecotourism-based recreation opportunities in the town and village.** Tracy Solar continues to work with local environmental organizations and provide donations and will continue to do so into the future to reflect the regional outdoor recreational economy.
- **Foster economic development that capitalizes on rural and urban character.** Tracy Solar provides one in generational opportunities for additional revenue streams, in a way that harmonizes to the fabric of the local community. Through iterative feedback loops, community feedback is integrated into project design, while opportunities for bee keeping on site exist in an area that maintains several apiarist selling their goods to the ecotourism market in Clayton.

Orleans

- **Encourage green infrastructure to preserve water quality, air quality, and increase community resiliency to storm events.** The additional revenues gained from Tracy solar provide an opportunity to fund municipal green infrastructure projects, when funding for such initiatives can otherwise be sparse. Meanwhile, Tracy Solar's Share the Sun Fund provides an opportunity for community groups and municipalities alike to potentially fund green infrastructure projects. Further, Tracy Solar will provide emissions free energy, improving air quality, while the soils within the solar array have potential for increased stormwater filtration and retention, and increased carbon sequestration.
- **Use a balanced approach to increase job opportunities and expand the local economy.** Tracy solar will bring 170 union jobs during the construction phase of the project and 3 jobs during the life of the project. This will allow for local job opportunities and additional revenues into the local economy, without huge impacts on local systems and services.
- **Foster future land uses in a manner and layout that will preserve rural character, agricultural and/or natural features.** Tracy Solar system will have iterative conversations with the local

community to ensure project design reflect the rural character and natural features of the surrounding area.

General Education of Municipal Officials and Residents

To address municipal assistance, Tracy Solar provided an ESCROW account, so municipalities could hire consultants and legal staff in the collaboration efforts leading up to the 94-C application where Intervenor funding is provided as part of the permit review process. This increased the quality of the conversations between the municipalities and Project in the application development phase and avoided any potential expense to the local taxpayer. In addition, Tracy Solar will take municipalities on bus tours, provide training, and have in-depth conversations at the request and need of host municipalities to ensure all needs and questions are met.

8. Feedback from the Community

Virtual Meetings and Podcasts

During to the COVID-19 pandemic, Tracy Solar needed to adapt its community outreach strategy to continue the important work of informing communities during challenging times when it was not possible to meet in public gatherings. The solution was to hold virtual community meetings where Tracy Solar developers and experts shared updates on project development, studies conducted, land acquisition, our conversations with state and local officials, other consultations, and the Article 10 / Section 94-c permitting processes, including the anticipated application date and information regarding the future availability of local agency and community intervenor funds.

Another such tactic was distributing podcasts, available on the Tracy Solar project website. When awarded a contract with NYSERDA, Tracy Solar will develop a new podcast focused on the impact on the community, featuring interviews with landowners, environmental groups, local businesses and other stakeholders.

Project Website

Tracy Solar project has a user-friendly website containing information about specific benefits to both the community and our environment, and any information previously shared with the community, including public meeting information boards, newsletters, and permitting documents. The website also includes multimedia experiences and information on how to communicate with the project development team, provide feedback, or seek additional information. The Tracy Solar Project can be found at www.edf-re.com/projects/tracy-solar

9. Forthcoming Community Outreach Strategies and Activities

Recognizing Tracy Solar could be nearing the construction phase of its life, should a NYSERDA Tier 1 contract be awarded, future outreach strategies will involve keeping the community and municipality involved and informed of processes moving ahead, as well as continued conversations and feedback loops finalizing project designs to continue to integrate project into fabric of community.

Leading up to construction, Tracy Solar will engage with the local community to provide a booklet of local services and hospitality businesses to distribute to the hundreds of construction workers who will work in

the area for many months. This booklet will help promote local businesses across Jefferson County to maximize opportunities to support the local economy. When we consider the potential impact across a variety of sectors and businesses the collective impact is great.

Finally, through a combination of podcasts, webinars, mailers, public meetings, website updates or one on one conversations, the Project team will continue to communicate relevant information and collect meaningful feedback from all stakeholders to better integrate the Project within the community.

Community Opportunities/Capacity Building

Tracy Solar recognizes the importance of building community opportunities and capacity during the development, construction, and operation of the project and will continue in many of our engagement and outreach efforts as listed below:

- \$30,000 Share the Sun Fund, community grant program with selections by local committee (for ten years)
- Annual \$2,000 Scholarship to students from Lafargeville Central Schools (for ten years)

Tracy Solar realizes community engagement is an iterative and long-lasting process and thusly cannot put an end date on our community engagement plan as conversations, partnerships and outreach will continue so long as the Tracy Solar Energy Center is in development and operation. Further, we recognize despite every effort to solicit feedback from the local community, there may be voices we have missed. Tracy Solar encourages community residents to continue to reach out and become an integral part of the project!