November 24, 2021

Devon Korn
Project Review Officer
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Re: APA Project 2021-0248, Large Scale Subdivision, Town of Jay

Dear Mr. Korn

The large-scale subdivision development proposed for Jay, NY (P2021-0248) is wrong for this region and wrong for this global era.

The world is facing a climate crisis of unknown magnitude. In 2019 New York State enacted the Climate Leadership and Community Protection Act to address and mitigate the climate crisis, by setting goals to reduce carbon emissions to 40% below 1990 levels by 2030, and to 85% below 1990 levels by 2050, and to offset the remaining 15% of emissions by planting trees which take carbon dioxide out of the air, to reach net zero emissions. One of the specific goals of the legislation is to undertake: "measures to achieve healthy forests that support clean air and water, biodiversity, and sequester carbon."

The Adirondack Park is a globally unique ecological region. At this time of climate crisis, it is contrary to reason for the developer to propose, and for the Adirondack Park Agency to affirm, a development in 350 acres of Adirondack forest and wetlands with 120 mansion and boutique hotel-type dwellings which will have a significant impact on our climate; it will adversely impact the carbon sequestration benefits of this 350 acres of currently open space, it will introduce new carbon emissions through the construction of 120 second home mansions and other dwellings; it will disrupt the existing biodiversity and habitats of migratory songbirds and other wildlife in the area.

The Adirondack Park Agency must reject this application as an impediment to New York State's ability to reach its climate goals under the Climate Leadership and Community Protection Act.

Aside from the huge adverse climate impact of the project, as many commenters have already noted, the application itself is significantly deficient in essential areas, as follows:

> The application requires a "Natural Heritage Program Report" which includes an inventory of "rare, threatened, endangered, or vulnerable plants, and threatened, endangered, and special-concern animals...." This is missing from the application materials. It is critical information that must be provided by the applicant, especially in the context of recent reports of the massive decline in migratory songbird populations, (https://www.adirondackalmanack.com/2019/09/study-tracks-massive-loss-of-birdlife-since-1970.html).

The proposed project lies in the middle of an unbroken contiguous forest that stretches from Jay to Ausable Forks, and which likely provides critical wildlife habitat. The applicant must provide the information required in this section, particularly "significant wildlife habitats...vernal pools, connectivity and natural wildlife corridors...".
> The application further requires a "Bird Species Inventory", identification of "Significant Avian Nesting Areas" and an "Invasive Species Inventory". This is missing and must be provided by the applicant.

> The application requires a map depicting "Large Forest Blocks" surrounding the project site. Of the several maps included in the application materials, all are so poorly labeled it is not possible to relate them to the project description, which is also very sparse. The maps must contain more explanatory information that ties them to the application document, and the document must contain more descriptive material.

**Viewshed:** The application requires "Areas of the site presently visible from public view locations." The applicant notes in maps provided, and in early promotional materials, that dwellings on the site will have views of the Jay Range and the High Peaks. However, there is no discussion of the project's impact on the viewsheds from the hiking trails on the Jay Range and High Peaks. This must be provided.

**Wetlands:** The application requires a "Critical Areas Map," and a "Project Site Base Map" which, among other things, require and identification of wetlands, and permanent and intermittent streams. The only depiction of the wetlands appears in the applicant's Concept Sketch Plan. Much more through mapping, and a thorough analysis of the project's impact on the wetland and permanent and intermittent streams, and vernal pools is required.

> Aquifer Recharge Areas: Another significant omission by the applicant is, "Any renewable resource lands such as primary and principal aquifers and aquifer recharge areas..." In 2020 and 2021 area residents experienced dry wells in the early summer. It is critical that in this era of climate disruption, the applicant identify aquifer recharge areas on the property, and provide a thorough analysis of the water withdrawal impact of the development.

**Conservation Design:** The APA introductory materials clearly state the goal of "protection of open space, wildlife, and habitat resources in accordance with the objectives of conservation design." The Concept Sketch Plan provided by the applicant shows rows of mansions, hotel units, and cabins sprawled on roads throughout the project site, with little apparent recognition of conservation design principals. The project must be redesigned with adherence to conservation design principles.

**Housing:** The majority of comments submitted on the APA website by local residents show significant local opposition to this project, clearly objecting to a mansion-style second-home community inserted into what is essentially a rural area. Residents expressed a deep appreciation for the existing low key, non-hurried aspect of the area, as contrasted with the tourist areas like Lake Placid, and expressed a strong interest in keeping the character of the area as it currently is. If any housing is built it should be low-income housing, not 6,000 - 10,000 sq ft behemoths that are occupied only part-time.

Finally, even if these deficiencies were corrected in the application materials, the Sierra Club Atlantic Chapter would call on the Adirondack Park Agency to reject this application as inimical to New York State's goal of reducing carbon emissions and developing or protecting areas to sequester carbon.

Sincerely,

Kate Bartholomew
Chair
Sierra Club Atlantic Chapter