



Albany Office

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February 11, 2020

Tim Reilly
Town of Glen
7 Erie Street
Fultonville, NY 12072

Re: Town of Glen
Eden Renewables Site Plan Review – Van Epps
Our Project No. 67-1901

Dear Mr. Reilly:

We are in receipt of the January 31, 2020 comment response letter, revised FEAf, Visual Assessment Report with maps and Site Plan set dated revised January 28, 2020 all as prepared by Environmental Design Partnership, LLP. The project involves the construction of a 7.5 MW DC solar array with solid state battery storage at 677 Van Epps Road (tax map id 51.-1-12.11). Based on a review of the documents, we have the following comments:

FEAF

1. All prior comments have been satisfactorily addressed.
2. The proposed acreage is stated at 10.02 acres for the panels on a 58.7 acre parcel (after lot line adjustment), however the FEAf indicates that the total project site is still 35.6 acres. The FEAf should be revised to agree with the most recent plan update.
3. The proposed responses provided for Part 2 & 3 of the FEAf have been reviewed and are found to be suitable for the project as designed and the proposed mitigation measures to be taken.

Plans

1. Total acreage of disturbance stated under the Site Plan Statistics is 0.94+/- (combined for the Mohawk View & Van Epps projects). The individual disturbance areas for trenches, access road, equipment pads, etc. should be provided in tabular format to confirm this amount as this is very close to the 1 acre threshold. The current Access Road Detail does not meet the definition of "pervious", so the addition of this disturbance would trigger the requirement for a Full SWPPP.
2. The proposed location(s) for the warning signs have been identified on the site plans and the signage detail complies with the Town of Glen Code.
3. Planting details have been provided and comply with the Town of Glen Code.
4. The completed Solar project is stated to cover about 10 acres of the reduced 58.7 acre parcel after a lot line adjustment, which equates to approximately 17% lot coverage, which is below the maximum 25% lot coverage set in the Town of Glen code.
5. The front setback on the Site Plan is shown at 50', however, the response letter states that it has been increased to 100'. The plans should be revised to show the 100' front setback line.



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Stormwater / SWPPP

1. A SWPPP was not provided for review, as the construction disturbance of this project and the neighboring Mohawk site is stated to be 0.96 acres, which is less than one (1) acre threshold.
2. The "Pervious Gravel Access Road Section Details" in the plans as provided 01/29/2020 does not conform to the Pervious Limited Use Pervious Access Road Detail as purported sanctioned by David Gasper, NYSDEC for use on Solar Field sites.
3. The minimum Erosion and Sediment Control plan only appears to include a stabilized construction entrance and concrete washout Area. Any and all land disturbance areas must include measures to prevent sediment transport to the maximum extent practicable.
4. Very few of the notes included on the Erosion and Sediment Control Plans apply to this project. Please adapt notes to the particular needs of the project.

Visual Impact Assessment

1. The visual assessment includes an evaluation of 15 visual receptor locations along Lusso Road, Van Epps Road and NYS Route 30A. The addition of vegetative screening appears to effectively hide the majority of the solar panels from view.

Solar Panel Information

1. The proposed Somera P-Duplex Half-Cell 144 PV modules are shown as having a layer of anti-reflective film on the glass. The document mentions that the coating can wear over time, so the applicant should provide the life expectancy of the coating.

Decommissioning Plan

1. The Decommissioning Plan details the proposed removal of solar energy system components and site restoration, details to anticipated costs for decommissioning and provides an estimate for the decommissioning fund in general conformance with NYSERA guidelines. The proposed current decommissioning value of \$211,381.00 is consistent with other similar sized solar projects in this region. The estimated decommissioning cost after 25 years is estimated to be \$346,372 based on a 2.5% annual inflation rate. It is recommended that the decommissioning costs be revisited every 5 years to account for market fluctuation and the security value be updated accordingly.
2. A sample Irrevocable Standby Letter of Credit has been provided and should be reviewed by the Town attorney.

If you have any questions, please feel free to contact me.

Sincerely,
KB Group of NY, Inc. dba PRIME AE Group of NY

Douglas P Cole

Douglas P. Cole, P.E.

