



Albany Office

100 Great Oaks Boulevard | Suite 114 | Albany, New York 12203

P: 518.382.1774

March 10, 2021

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

Re: Town of Glen
Borrego Solar Project
Our Project No. 67-1901

Dear Mr. Reilly:

We are in receipt of the Building Permit Application dated February 8, 2021, FEAF part 1, Owner Authorization Form, Site Use Permit Plans dated February 10, 2021 as prepared by Borrego Solar Systems, Inc., as well as the Decommissioning Estimate/Plan dated March 2, 2021 as prepared by. The project involves the construction of a large-scale, ground mounted, solar photovoltaic system that consists of 5 MW AC system with 12,688+/- panels on approximately 19.17 +/- acres of the total 47.64 +/- acres (tax map id 53.3-1-13). Based on a review of the documents, we have the following comments:

Building Permit Application

1. No comments.

FEAF

1. Section C.4-d: Parks in the vicinity of the project site should be listed. Tribes Hill Community Park and Auriesville Pilgrimage Lunch Area should be considered at a minimum.
2. Question E.3.g is unanswered. Applicant has indicated a Cultural Resource Assessment is being performed per OPRHP request to verify if additional archaeological or historic site(s) or resources exist on the project site.

Site Plans

1. Upon reviewing the submitted site plans, it is shown that no grading will occur as part of this project. If this is not accurate, drawings should be revised to show proposed topography.
2. If culvert extension is anticipated to be a part of this work, it should be identified as proposed and details should be provided.
3. Erosion and sediment control protective measures should be shown around "swampy water course" as to not pollute this water body during construction. Additionally, the gravel access road should have details provided for at this location.
4. Site plans should show approximate limits of disturbance.
5. Proposed location(s) for signage are not identified on the site plans. Details of any proposed signage should be provided including location, height, size, materials, and design.



CONNECTING. CREATING. CONSERVING. COMMUNITY.

www.primeeng.com

6. A lighting plan has not been submitted as required by the Town of Glen Solar Code.
7. The Site Plan provides 5' contours which meets the Town of Glen Code requirement of 5' contours.
8. The Town of Glen Code requires a site plan scale of one inch equals 20 feet or less. The drawing set provides a scale of one inch equals 100'. We find this scale to be adequate as sufficient detail is visible.
9. The Solar Access Roads shown are 16' in width. These widths appear to meet the minimum requirements for firefighting equipment access, however local fire department input should be requested by the applicant.
10. Detail provided to show the height of solar panels references a "S-0.0" that was not provided. This should be provided to confirm that the maximum height of the solar panels will be 15' as stated in Building Permit Application and complies with the Town of Glen Solar Law.
11. The Zoning Summary Table on sheet C-3.0 Layout and Materials Plan states the provided lot coverage is 15% which includes coverage and solar panels. The fenced in area which contains the solar panels however states an acreage of 19.17, or 40% coverage. The Applicant should review and clarify the lot coverage stated in the Zoning Summary Table.
12. The front setback on the Site Plan is 288'. This meets the Town of Glen Solar Law minimum of 100'.
13. The Site Plan indicates that the side setbacks are 52' and the rear set back is 101'. This meets the Town of Glen Solar Law requirements for 50' side and 100' rear setbacks.
14. Fencing is indicated on the Site Plan with a height of 7'. This meets the minimum required fencing height as stated in the Town of Glen Solar Code.
15. A visual environmental assessment form (Visual EAF) and visual assessment report was not provided for review as required in the Town of Glen Solar Code. The Visual EAF and visual assessment report including appropriate modeling, and photography assessing the visibility from key viewpoints identified in the Visual EAF, existing tree lines, surrounding topography, and proposed elevations should be submitted.

SWPPP

1. In item D.1.b., it is stated that the total acreage to be physically disturbed is 9.80 acres. As this is above the 1 acre threshold for preparing a full SWPPP, a full SWPPP should be provided for review and approval.

Decommissioning Plan

1. Decommissioning Plan should include a description of circumstances in which the decommissioning plan would be employed. Town Solar Code states that solar panels out of use for 12 months must be removed at owner's/operator's expense.
2. Days required to break up concrete pad is equal to (1), (1) multiplied by the rate of excavator use (\$1,287.74) is greater than the total concrete pad removal cost given (\$1,287.74 > \$1,193.07) and does not even consider the operator's rate (\$49.43/hr). This cost should be revised.
3. Seeding disturbed areas should include labor rate for the time it will take to seed, not just materials.
4. Disturbed area for decommissioning only equates to approximately 1.2 acres disturbed when initial disturbance to install the same materials is 9.80 acres. A clarification should be provided to outline this discrepancy.
5. Decommissioning plan should include an expected lifetime of the solar site. This appears to be 25 years given the future cost analysis, however it should be clearly stated in the plan.



6. Module removal rate is stated to be 0.5 minutes/module which is equivalent to 30 seconds per module. This seems unattainable, clarity on the on the matter should be provided or the rate should be updated.
7. Rack wiring removal rate is stated to be 0.25 minutes/module which is equivalent to 15 seconds per module. This seems unattainable, clarity on the on the matter should be provided or the rate should be updated.
8. It should be clarified if underground conduit will be abandoned or removed from site.
9. The backfill required to regrade the areas in which solar panel foundations once were should be considered in quantity of backfill needed and time to regrade.
10. Decommissioning Plan is to be executed no more than (9) months after written notice to remove solar collector system has been issued by Town.
11. Applicant should confirm that the proposed decommissioning amount is the future value provided.

Conditions of Approval

We have prepared the following draft conditions of approval to be considered by the Planning Board. Additional items may be added upon further review by the Planning Board or based on revised plans or documents from the applicant.

1. Decommissioning surety to be agreed upon by all parties and provided by owner. Surety to be provided under written agreement with the Town.
2. Decommissioning Cost Estimate to be revised every 5 years by N.Y.S. Licensed P.E.

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, P.E.

Senior Director of Engineering

cc: Gregory Gibbons, Borrego Solar

