

Our ref: 11227527

December 14, 2021

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

**Response to Comments – 411 Reynolds Road Wind Energy Project, Town of Glen, New York**

Dear Mr. Reilly:

On behalf of Borrego Solar and in connection with the Reynolds Road Wind Energy Project, GHD is writing this letter in response to the latest comment letter from Douglas Cole, PE (Prime AE Group of NY [Prime AE]) dated November 16, 2021, which was received via email.

Comments which were previously addressed or acknowledged have been removed for tracking outstanding items. We appreciate the time taken to review the documents and offer the following responses:

**Building Permit Application**

- 1. We note that a zoning map was unable to be located at the time of response letter. When application is updated to identify the parcel as R-R Rural Residential, it shall be resubmitted to TDE for verification.**

*GHD Response:*

*The attached revised application has been updated with the parcel identified as R-R Rural Residential.*

**FEAF Part 1**

*GHD Response:*

*Per the Prime AE letter, the previously provided FEAF Part 1 is acceptable, and no further action is required.*

**Site Use Permit Plans**

*Updated Plans have been provided with this letter. See responses to specific comments as follows:*

- 2. Applicant has indicated they will update the plans with survey data. Applicant should resubmit plans for verification.**

*GHD Response:*

*Survey data is found on Sheet C-0.0.*

- 3. Applicant has indicated they will update the plans to remove references to DeRuyter. Applicant should resubmit plans for verification.**

*GHD Response:*

*Town name has been corrected on Sheet C-0.0.*

**4. We acknowledge the explanation of comment 9, “sediment collected... shall be disposed of on the site on a regular basis.” on Sheet C-0. Applicant has yet to submit revised plans showing the revision to this comment as stated.**

*GHD Response:*

*Comment has been revised on Sheet C-0.0.*

**8. Plans should include note of the color of the proposed turbine. \*\***

*GHD Response:*

*Turbine color has been noted on Sheet C-0.0.*

**11. Applicant states that location and types of disturbances will be included on revised plans. Applicant should resubmit plans for verification.**

*GHD Response:*

*Type and size of disturbance are shown on Sheet C-3.0.*

**12. Applicant states they will revise plans to include dimensions of the crane pad and identify the details on revised drawings. Applicant should resubmit plans for verification. Applicant states that foundation is to be designed by licensed PE based on the geotechnical report. These will be submitted as part of the building permit application. We find this to be acceptable.**

*GHD Response:*

*Crane pad dimensions are shown on Sheet C-5.1 and gravel access road detail on Sheet C-8.0 has been relabeled to show both access road and crane pad.*

**13. Applicant indicates they will label what they believe to be the existing culvert to be replaced on revised plans. Applicant should resubmit plans for verification.**

*GHD Response:*

*Existing culvert has been labeled on all Plans.*

**14. Applicant has indicated they will be reviewing grading and intent at the site entry-way on the north side of the proposed access route further. Applicant should provide additional information regarding intent as it becomes more available.**

*GHD Response:*

*The roadside swale has been adjusted on the north side of the access road to protect the adjacent wetlands on Sheet C-6.0.*

**15. Applicant indicates they will identify overhead and underground wires, linetypes, and other associated symbols with further detail on revised plans. Applicant should resubmit plans for verification.**

*GHD Response:*

*The overhead and underground lines are shown on all Sheets.*

**17. Applicant indicates they will revise plans to more clearly identify the “temporary truck route” versus the permanent access road. Applicant should resubmit plans for verification.**

*GHD Response:*

*Temporary and permanent roads are labeled on Sheet C-3.0.*

**18. Applicant indicates that they will identify connection equipment and any ground mounted equipment at the turbine. Applicant should resubmit plans for verification. \*\***

*GHD Response:*

*Connection equipment and ground mounted equipment are shown where the overhead electrical lines become underground lines on Sheet C-3.0.*

**21. Applicant indicates they will revise plans to show traffic flow patterns in and around the site. Applicant should resubmit plans for verification.**

*GHD Response:*

*Traffic flow arrows are shown on Sheet C-3.0.*

**22. Applicant indicates they will revise plans to include details for proposed filter strips. Applicant should resubmit plans for verification.**

*GHD Response:*

*The filter strips shall be detailed in the revised SWPPP and, if necessary, shown on Plans.*

**24. Proposed setback from the nearest residence is 1,724'. This is in compliance with the recommended requirement of 1,500' from residences. A dimension should be added to the plans showing this setback. \*\***

*GHD Response:*

*Additional setbacks are shown on Sheet C-1.0. The nearest residential structure is 3,049 ft from the turbine.*

**26. Applicant indicates they will revise plans to include a gate at the access road to limit access. Applicant should resubmit plans for verification. \*\***

*GHD Response:*

*Gate is shown on Sheet C-0 and detail on Sheet C-8.1.*

## **SWPPP**

*GHD Response:*

*A revised SWPPP is currently being prepared and will be provided under a separate cover.*

## **General Wind Energy Based Comments**

**1. Applicant has completed a pre-construction avian study for the project site. This should be submitted to the Town for record. Applicant also describes that they will be complying with all of NYSDEC's requirements. Applicant should proceed and continue following NYSDEC protocol through the duration of the project. \*\***

*GHD Response:*

*Avian and Bat Mitigation summary was provided electronically 12/8/21 and a memo on the Avian Field Studies was provided 12/14/21. One hardcopy of each was sent to the Town.*

**3. We note that communication and microwave studies were performed for this project and results will be submitted for review. \***

*GHD Response:*

*Communication and microwave studies were provided electronically 12/14/21 and one hardcopy sent to the Town.*

**4. A visual impact analysis is currently being performed. We recommend this should be submitted for review before a final decision is made by the planning board.**

*GHD Response:*

*Visual Impact Analysis was provided electronically 12/8/21 and one hardcopy sent to the Town.*

- 5. Applicant has indicated a shadow flicker analysis will be provided. We recommend this should be submitted for review before a final decision is made by the planning board. \***

*GHD Response:*

*Shadow Flicker Analysis was provided electronically 12/8/21 and one hardcopy sent to the Town.*

- 6. Applicant has indicated a noise analysis will be provided.**

*GHD Response:*

*Sound Modeling Report was provided electronically 12/8/21 and one hardcopy sent to the Town.*

- 7. Applicant has indicated a post construction noise compliance report will be submitted to the town once construction is complete. Applicant has indicated that annual certification is not typical for community wind projects. \*\***
- 9. International Electrotechnical Commission (IEC) Certification should be noted on plans. \***

*GHD Response:*

*A note that all equipment shall meet standards of IEC was added to Sheet C-0.0.*

- 12. Applicant has indicated a fire protection and emergency response plan to address emergency response will be provided at the time of application for a building permit. This plan should be submitted prior to the building permit phase. We recommend this should be submitted for review before a final decision is made by the planning board. Applicant should coordinate with local emergency response providers to provide an emergency response plan and training. As local fire department is volunteer based, applicant should provide site specific training annually. \*\***

*GHD Response:*

*Fire Protection and Emergency Response Plan was provided electronically 12/8/21 and one hardcopy sent to the Town.*

- 13. Applicant has indicated they will supply photos and manufacturer's specifications of the proposed turbine model – Including decibel data, and material safety documentation for all materials used in the operation of the equipment. We recommend this should be submitted for review before a final decision is made by the planning board. \*\***

*GHD Response:*

*Borrego Turbine Sound Standards was provided electronically 12/8/21.*

- 14. Applicant has indicated that construction would commence in Fall 2022, with complete operation by Summer 2023. Planning Board should be notified of any changes to anticipated schedule. Applicant has indicated a traffic analysis with a description of the routes to be used by construction and delivery vehicles will be provided. We recommend this should be submitted for review before a final decision is made by the planning board. \*\***

*GHD Response:*

*Transportation Standards Document was provided electronically 12/14/21 and one hardcopy sent to the Town.*

**16. Applicant has indicated a transportation plan describing routes to be used in delivery of project components, equipment and building materials and those to be used to provide access to the Site during and after construction is underway and will be provide once complete. This plan should also describe any anticipated improvements to existing roads, bridges or other infrastructure, as well as measures which will be taken to restore damaged/disturbed access routes following construction. We recommend this should be submitted for review before a final decision is made by the planning board. \*\***

*GHD Response:*

*Transportation Standards Document was provided electronically 12/14/21 and one hardcopy sent to the Town. This document specifies the items included to ensure no adverse impact or expense to the community will result from the delivery of the wind turbine components, and measures taken to restore any damaged/disturbed roads following construction.*

**17. Applicant has indicated they will provide an O&M plan. O&M plan should include regular periodic maintenance schedules, any special maintenance requirements and procedures, and notification requirements for restarts during icing events. We recommend this should be submitted for review before a final decision is made by the planning board. \*\***

*GHD Response:*

*Operation and Maintenance Plan (O&M) was provided electronically 12/8/21 and one hardcopy sent to the Town.*

**18. Applicant has indicated they will provide an assessment of potentially impacted wetland, surface and groundwater resources, and the geology and land use of the site, as well as an assessment of construction phase impacts, traffic impacts and adverse sound impacts that may arise from the project construction. We recommend this should be submitted for review before a final decision is made by the planning board. \*\***

*GHD Response:*

*Borrego has performed a variety of studies on the existing conditions of the site to address these items. The various data can be found in the application documents as follows:*

**Wetlands** – *See wetland report provided electronically 12/14/21 and hardcopy sent to the Town.*

**Surface and Groundwater** – *The Stormwater Pollution Prevention Plan (SWPPP) addresses the specific measures that will be taken to protect water resources from construction level erosion and sediment, as well provide post-construction stormwater controls.*

**Geology and Land Use** - *See WebSoil Survey data included in SWPPP. Additionally, see Sheet C-1.0 which includes information on land use for the property and neighboring parcels. This plan was produced via information provided by an on-site survey of the property, property tax rolls, and aerial imagery.*

**Construction Phase Impacts** – *Community wind projects are on a much smaller scale than utility wind farms, and therefore construction impacts for this project are expected to be minimal. Comment response #16 addresses potential impacts due to turbine component delivery. Construction duration is expected to take approximately 6 months.*

**Traffic Impacts** – *The site will be unmanned and so will have no permanent traffic impacts. For delivery traffic, please see comment #16 for measures taken to ensure no adverse impact.*

**Sound Impacts** – *Please see Sound report and supporting documents emailed 12/8/21 followed by hardcopy sent to the Town.*

## **Decommissioning Plan**

*GHD Response:*

*Decommissioning Plan has been updated to address the comments and provided with this letter.*

**1. The Decommissioning Plan is said to be updated and the SWPPP will provide further clarification that the height of the turbine will be 394' to the top of tower. The blade length will be 246'. And at the highest rotation, the overall height will be 640'. The Decommissioning Plan and SWPPP should be resubmitted and shall be consistent with these values.**

2. The Decommissioning Plan is said to have been revised to include a general description of the removal process. This revised plan should be submitted for review. We note that the demolition contractor will be responsible for true means and methods at the time of disassembly.
3. Applicant has noted that the amount for the surety bond will be based on the Decommissioning costs before salvage.
4. The decommissioning plan will be updated to note that a surety bond will be provided. \*\*
5. Decommissioning plan will be updated every 5 years by a licensed professional engineer. Applicant indicates the revised decommissioning plan will indicate this. \*\*

\* - This comment is based on the Wind Energy Guidebook for Local Governments by NYSERDA.

\*\* - This comment is based on the Town of Duanesburg Wind Energy Facility Law, as the Town of Glen does not currently have a local law for wind energy.

If you have any questions or require additional information, please do not hesitate to call me at the number below.

Regards



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