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Our ref: 11227527

April 14, 2022

Mr. JD Downing, Chairperson Town of Glen 7 Erie Street Fultonville, New York 12072

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

Dear Mr. Downing:

On behalf of Borrego Solar and in connection with the 411 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 January 20, 2022, which was received via email.

Comments that were previous addressed or acknowledged have been removed, and comments that were addressed and accepted in the latest letter are shown with a strikethrough. We appreciate the time taken to review the documents and offer the following responses:

Building Permit Application

1. No further comments.

FEAF Part 1

1. No further comments.

Site Use Permit Plans

12. Crane Pad details and dimensions have been provided. Drawings now include maximum dimensions for the turbine pad. Applicant states that the turbine foundation is to be designed by licensed PE as per the geotechnical report. The foundation drawings are proposed to be submitted as part of the building permit application. Maximum pad dimensions of 70' in diameter and 20' in depth have been identified. In the event that these dimensions are exceeded, the project would need to come back to the Planning Board for approval of the increase.

Borrego Response: If turbine foundation dimensions exceed the maximum dimensions provided, we agree to present the change and justification to the Planning Board for approval.

16. We note that the site survey was not performed specifically to identify bedrock outcroppings. The FEAF indicates the possibility of rock outcroppings which is a more conservative measure if they are discovered during construction. However, it was noted in the October 21, 2021 letter that a geotechnical investigation is expected to occur to aid in foundation design. The results of the investigation and geotechnical report should be submitted to the Town for the record.

Borrego Response: We agree to submit the geotechnical report to the Town once it is completed.

27. Applicant has indicated they are prepared to submit a new application to the Army Corps of Engineers (ACOE) for the disturbance of 0.25 acres. A draft Joint Application was submitted for review, however, the applicant should submit final approval of plans by ACOE to the Town.

GHD/Borrego Response: By decreasing the temporary disturbance around the work areas, the wetland disturbance has been decreased to 0.21 acres. This is shown on the revised Plans. The Joint application for permit has been updated to match and was submitted on March 24, 2022. We will provide an update to the Town once received.

28. Proposed tree clearing has increased from 3.42 acres to 3.50 acres, plus the (2) additional clearings of 600sf and 300 sf respectively. The note on sheet C-3.0 should be updated accordingly.

GHD Response: Plans have been revised.

30. Plans should include all revision dates of each issuance of plans to easily identify which plans have been modified in each release. All plans have a date of **12/15/2021** but it is clear some have been modified since that date.

GHD Response: Revision dates have been added to the Plans.

31. We note that the proposed slope on eastern side of the site has decreased on the revised plan.

GHD Response: Plans have been revised.

SWPPP

- 1. Section 3.1 has been revised to note 80% vegetation establishment prior to removing erosion and sediment control practices.
- 2. Section 3.1 has been revised to include maintenance of erosion and sediment control practices throughout construction.
- 3. Applicant has revised the first paragraph in Section 3.2 regarding 5-acre disturbances. The SWPPP now confirms that the project will not include the disturbance of more than 5 acres at any one time. In addition alerting the NYSDEC Regional Office, applicant would need to notify the Town and apply for a new permit as this would not be covered under the current application.

Borrego Response: We agree that should a disturbance of 5 acres or greater be required at one time, Borrego shall notify the NYSDEC and the Town, as this would result in a change to the site plan.

4. In Section 3.5.a., there is a reference to a "lease exclusion zone". Applicant indicated they would show this zone on the plans, however, it has not been added to the plans.

GHD Response: The exclusion zone is shown on the Existing Conditions Plan C-1.0.

- 5. Applicant has not revised the plans to show the anticipated location of filter strips that are planned to be a post-construction stormwater management practice and the details for such practice. Applicant should resubmit plans and SWPPP showing these items. Furthermore, Section 3.5 has been revised to state that the RRv requirement will be met by utilizing dry swales. However, there are still various references to filter strips throughout this section and on page 6 under Runoff Reduction Techniques, use of filter strips is the proposed RRv method identified and the words "no vegetated swale was incorporated into the project." are included in this section. These statements appear to be contradictory. The SWPPP should be revised to be consistent throughout when describing means and methods of addressing stormwater management requirements. Furthermore, page 7 shows that dry swales are being used to meet the entirety of the RRv requirement, but Appendix D includes references to filter strips. There are numerous contradictions in this plan that need to be addressed by the applicant, including the list below:
 - Grass-lined swales are called out on plans and on the detail sheet, but not in the hydraulic calculations.
 - A level spreader detail is included, but the location is not shown on the plans.
 - No filter strip is shown on the plans or on the detail sheet.
 - Dry swales are stated to be used in the SWPPP but are not shown on the plans or on the detail sheet. Where will the underdrains daylight?

GHD Response: SWPPP has been revised. Level spreader detailed from revised Plans. Dry swales are no longer used in the project; therefore, no underdrains required.

6. The SWPPP appears to have been revised to show that peak flow for 1-year, 10-year, and 100-year events will not increase from pre and post construction and that CPv for pre and post conditions will not increase. The CPv calculations are not shown in the hydraulic calculations in Appendix F and need to be provided for review and verification. Furthermore, WinTR-55 calculations are not representative of the information presented in the tables. For example, the 10-yr storm values for both pre and post development conditions show 64.71 cfs in the calculations, but the post-development figure in the table is 64.39 cfs. Revised calculations should be submitted to correlate with information in the body of the Plan.

GHD Response: SWPPP has been revised. See HydroCAD model results Appendix F.

7. The SWPPP now includes the calculations of Channel Protection Volume, Overbank Flood Control, and Extreme Flood Control. However, as stated in other comments, it is unclear how the values representing each of these were obtained. The applicant should provide calculations for each of these items.

GHD Response: SWPPP has been revised. See HydroCAD model results Appendix F.

- 8. Section 3.6 now includes Operation and Maintenance of proposed Erosion and Sediment Control Practices that will be implemented for this SWPPP.
- 9. Section 4 has been revised to remove the Town as Owner/Operator. However, it still refers to Borrego as Owner/Operator. Borrego has made it clear that they will not own or operate the site long term. Section 3.6 appears to support the same idea. Therefore, the SWPPP should be revised to represent how the site will be maintained and inspected without Borrego's involvement.

GHD Response: SWPPP has been revised.

- 11. Appendix G has been revised to include the standard Construction Duration Inspection form.
- 12. The SWPPP now includes specific references for each contractor's responsibilities regarding implementing and maintaining the SWPPP.
- 13. The size of the proposed filter strips are included in the dimensions of the NYSDEC worksheet calculations in Appendix F, but they are not shown as a detail or on the drawings which makes it difficult to verify the location and dimensions of the proposed practices.

GHD Response: SWPPP has been revised. The only filter strip still proposed is the blade laydown area, which will remain a vacant grass area meeting the filter strip requirement.

14. The SWPPP should include the latest version of submitted plans.

GHD Response: SWPPP has been revised.

- 15. The Construction Sequence now includes a typical schedule to identify the timing of implementation of the erosion and sediment control practices.
- 16. The SWPPP includes details of the plans regarding erosion and sediment control practices, however, filter strip details are not provided.

GHD Response: Filter strips are undisturbed grass or vegetated areas. No details are provided because they are not constructed practices. They are shown on the revised Plans.

- 17. The SWPPP, in Section 3.3 includes a description of the pollution measures that will be used to control litter and construction debris, as to prevent it from becoming a pollutant source to stormwater discharge.
- 18. The Stormwater Calculations and Modeling Results (Appendix F) lacks a map showing pre and post development conditions including watershed/subcatchment boundaries, flow paths, routing and design points. The subcatchments should correlate with subcatchments shown in the NYSDEC worksheet calculations. The post-development map should show the stormwater control practices and how they will be utilized.

GHD Response: SWPPP has been revised.

19. We acknowledge that no soil testing has been performed to date, however, the applicant should confirm soil conditions support the design of their post-construction stormwater management practices.

GHD Response: SWPPP has been revised.

20. Site Plans in the SWPPP do not appear to be the most up to date version, but it is hard to tell since all prior versions have the same date of 12/15/2021. SWPPP should include all up to date drawings with revision dates.

GHD Response: SWPPP has been revised.

21. Water Quality Volume Calculations in Appendix F contain four (4) subcatchments, but Figure 2 and hydrocalculations only show the consideration of 3 subcatchments. Additionally, the "total area" should be representative of the entire acreage of the sub catchment. If the site needs to be broken out into additional subcatchments to accurately show changes to the site, these should be shown in Figure 2.

GHD Response: SWPPP has been revised.

22. The title for Table 2 in Section 3.5 says "Pre-Development 1-year, 24-hour event" but column headings indicate it is representative of Post-Development Runoff.

GHD Response: SWPPP has been revised.

23. The WQv is shown to be 4,334 cf. When considering all 3 subcatchments, totaling to 90.01 acres, and the new impervious surfaces, summing to 2 acres (according to WinTR-55 calcs Industrial and Gravel coverages), we calculate a larger figure. Applicant should verify how this figure was obtained. The identified subcatchments in the DEC provided worksheets sum to 4.26 acres and 4,334 cf, however, these do not appear to correlate with the new impervious surfaces shown in the WinTR055 calcs. It may be easier to verify these coverages if they were identified in the plans.

GHD Response: SWPPP has been revised.

24. The RRv is shown to be 752 cf. When considering all the new impervious surfaces in each subcatchment, that sum to 2 acres (according to WinTR-55 calcs Industrial and Gravel coverages), we calculate a larger figure. Applicant should verify how this figure was obtained.

GHD Response: SWPPP has been revised.

25. Borrego has made it clear that they will not own or operate the site long term, however, the final paragraph of Section 3.6 contradicts this. SWPPP should be revised to represent how site will be maintained without Borrego's intervention.

Borrego/GHD Response: SWPPP has been revised. To ensure future owners/operators of the facility will adhere to any conditions or requirements, Borrego establishes an LLC for each project. This allows all permits, documentation, or correspondence related to the project to be owned by the LLC, which is legally bound to adhere to the conditions placed on any special permit, environmental permit, or specialty permit. When Borrego transfers the LLC to a new owner/operator, any and all permits and associated conditions or requirements will transfer as well. This includes the statements included in the SWPPP. For the project located at 411 Reynolds Road, the project LLC is Glen Wind 1, LLC.

26. How are dry swales intended to be used to handle stormwater? In class D soils, very little infiltration is expected. As dry swales are required to have a 2' separation from the groundwater table, test pits in the proposed areas of their use need to be performed to support this design selection.

GHD Response: SWPPP has been revised.

27. Section 2.1 <u>Project Background</u> says that Reynolds Road is a "Town roadway", however, it is County Route 121.

GHD Response: SWPPP has been revised.

28. Section 2.4 <u>Involved Parties</u> has the NYSDEC Regional Office stated as Region 7, however, Montgomery County is in NYSDEC Region 4. The name and address should be revised accordingly.

GHD Response: SWPPP has been revised.

General Wind Energy Based Comments

Applicant has provided a pre-construction avian study for the project site. Applicant has noted that
no additional state and federal permits have been identified for the project (above those stated in
FEAF PartI). The applicant should provide an update on the potential need for a Taking Permit from
NYSDEC. **

Borrego Response: We have provided the Avian Study to the NYSDEC and continue to coordinate. The NYSDEC has indicated they will be issuing Standard Activity Permits for Incidental Take for raptors and NLEB, and an individual permit for grassland birds. The expected timeframe for issuance is approximately 6 months. We request this be considered for a condition by the Planning Board.

Applicant has advised that communication and microwave studies have been submitted to the FAA
and they anticipate review to be complete within the next few months. Applicant should provide
information regarding FCC review status. *

Borrego Response: No update from last month. We request this be considered for a condition by the Planning Board.

- 5. A shadow flicker analysis has been performed and provided. The model results state that two (2) receptors (381 Reynolds Rd and 138 Severine Lane) will have between 10 hours and 30 hours of shadow flicker per year. The table in Appendix B has been updated with receptor addresses for clarity.*
- 6. A noise analysis has been performed and provided. The table in Appendix B has been updated with receptor addresses for clarity. Existing sound levels at these receptors should be obtained, so that the potential impacts from the proposed project can be further assessed. Applicant indicates these samples will be taken and presented to the board prior to construction. However, we believe these samples should be presented during the SEQR review so potential noise impacts may be quantified.*,**

Borrego Response: Ambient measurements have been submitted. The measurements show that at all residences, the impact of Vestas or GE turbines will result in a 4 dB change, or less. This is below the 6 dB acceptable increase pursuant to the NYS DEC Noise Policy guidance.

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, however, the Town of Glen Planning Board may require this as a condition of project approval. The applicant indicates they will comply with any Planning Board conditions. **

Borrego Response: We would like to propose the following condition: "A post-construction sound report shall be performed within 6 months of commissioning of the wind turbine to ensure material compliance with NYS noise standards. During the life of the project, the operator shall perform and provide additional noise measurement reports to the Town as requested, no more frequently than annually."

12. A draft Emergency Action Plan was submitted for review. Applicant should coordinate with local emergency response providers to provide an emergency response plan and training. As the local fire department is volunteer based, applicant should provide site specific training annually. Applicant is amenable to conditions of approval regarding emergency response plans. **

Borrego Response: Agreed.

- 13. Applicant has supplied manufacturer's specifications of the proposed turbine model. See the new comment under the respective section. **
- 14. Applicant has indicated that construction is planned to commence in Fall 2022, with complete operation by Summer 2023. The Planning Board should be notified of any changes to the anticipated schedule. Borrego's Transportation Standards have been provided. These include reference to a traffic analysis with a description of the routes to be used by construction and delivery vehicles that will be provided. A field visit has been performed and summarized and submitted for review. Please see comments under the respective section. **

Borrego Response: The Town will be notified of any changes in the construction schedule.

15. Applicant has agreed to provide pre and post construction photos to the Town of the public road system to verify that no damages have occurred. If damages are identified by the Town, road owner or its agents, applicant will be responsible for all repair costs associated with such damages. Borrego's Transportation Standards have been provided. These include references to bonds that will be secured in the case that roads are damaged and not properly repaired by applicant. When final agreement and bonds are agreed upon by applicant and road owner, they should be submitted officially for the record. **

Borrego Response: Agreed.

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 provided 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. Borrego's Transportation Standards have been provided. These include references to a traffic study and bonds that will be secured in the case that roads are damaged and not properly repaired by applicant. When final study is conducted, and agreement and bonds are agreed upon by applicant and Town or road owner, they should be submitted officially for the record. Applicant has requested this be a condition of approval as they believe the most detailed plan could be obtained closer to construction. **

Borrego Response: Agreed.

Decommissioning Plan

Submitted items still lack consistency. Latest drawings state the tip height is 650', while The Decommissioning Plan shows the same dimension as 640'. Blade dimensions in the Facts & Figures sheetshows a dimension of 73.7m, which equates to approximately 242'. Decommissioning Plan shows the same dimension at 246'. Applicant should verify that dimensions are consistent throughout submitted materials.

Borrego Response: The dimensions listed are correct and accurate, but depend on context, some of which may not have been made explicitly clear. Future submitted material shall provide more context around dimensions to avoid confusion. The values listed above are defined below:

- Tip Height of 650': This is the elevation above existing ground level. It accounts for the turbine and blades themselves (640', see below), as well as any grading, and foundation work. This value is what is provided to the FAA and any other permitting authority who may be specifically concerned with the elevation of the turbine.
- Turbine height of 640': This is the actual height (or rather length) of the turbine from the bottom of the tower (i.e., top of the foundation) to the tip height. This value is reflected in anything that is more component or material focused (cut sheets, decommissioning plan, etc.)

- 73.7m blade dimension: This is the actual blade measurement itself, if measured when not installed in the rotor hub.
- 75m blade dimension: This is often used to refer to the blades, but is actually the radius of the swept area, which includes the blades (73.7m) plus the width of the rotor hub.
- 4. It appears that the bond for decommissioning is proposed to be made in the amount of \$321,559. In order to complete a detailed analysis of the decommissioning cost estimate, we ask that the applicant provide a detailed construction cost estimate. This should include a breakdown of materials, equipment, and labor.

GHD Response: Construction cost estimate is attached.

Borrego Transportation Standards

1. These standards verify that a transportation study will be conducted by a licensed, professional engineer when the route for material transportation has been selected. The applicant requests that the full study be a condition of approval for the building permit as infrastructure is ever changing and the study would be more accurate closer to the commencement of construction.

Borrego Response: Agreed.

Borrego Wind Turbine Sound Standards – all comments have been addressed

Sound Level Modeling Report & Modeling Summary and Recommended Sound Level Limit Review

1. Applicant intends to sample existing ambient sound levels at the same receptors as proposed in thereport. This is required so that pre and post construction sound can be analysed.

Borrego Response: This has been submitted.

2. Hub height is identified as 120 m. This appears to correlate with other submitted materials.

Shadow Flicker Modeling Report

3. Shadow Flicker report references a 4.3MW turbine, however, submitted Facts and Figures reflect a 4.2MW turbine. Applicant should verify model type and be consistent moving forward.

Borrego Response: The project may use a model 4.2 or 4.3 MW turbine dependant on availability when purchase occurs. This is electrical output only. The turbine is the exact same dimensions, and this has no effect on shadow flicker.

Revised report reflects the adjusted location of the proposed wind turbine.

Preliminary Operations & Maintenance Plan

1. Planning board to determine whether submitting a revised O&M Plan shall be considered as a condition of approval or not.

Borrego Response: Agreed.

Draft Emergency Action Plan

Emergency equipment is stated to be located on a map, but no map was provided.

Borrego Response: This will be provided in the final Action Plan.

2. Emergency contact information should be added to the plan.

Borrego Response: This will be provided in the final Action Plan since it is TBD.

3. Has local EMS, including fire response, been notified of the proposed facility? Will they be trained on potential site-specific response activities? Applicant has requested that the Draft Emergency Action Plan be submitted as a condition of approval. Planning board to determine whether submitting a revised DraftEmergency Action Plan shall be considered as a condition of approval or not

Borrego Response: Agreed.

Wetland Report

- 1. The Wetland and Stream Maps developed by LaBella have been overlayed in the plans.
- 2. Applicant has provided a copy of the draft permit application to the Town. However, this should be finalized with missing information and signatures and submitted to involved agencies at the applicant's earliest convenience. Applicant should provide permits to the Planning Board.

Borrego Response: The Joint Application package was submitted to the ACOE/DEC on March 28, 2022. We are awaiting comments. We have requested that wetland mitigation credits for the impacted areas be put on hold with the In Lieu-Fee program for purchase upon approval of permit.

Facts & Figures of Wind Turbine

1. Submitted spec's reflect the V150-4.2MW model, however all other submitted materials reference a V150-4.3 MW unit. It is unclear if this Fact and Figure sheet accurately summarizes the proposed turbine.

Borrego Response: Please see response to Shadow Flicker #3.

Communication Tower Study

- 1. A communication Tower Study has been performed and results were provided.
- 2. This study does not show any site-specific recommendations or degrees of acceptability based on placement of the proposed turbine in proximity to the existing tower and antennae. We note that applicant is currently seeking expert advice on this item.

Borrego Response: We have confirmed with our subject matter expert that the National Telecommunications and Information Administration (NTIA) coordinates and protects communications (FCC is the regulatory body that governs the market, NTIA protects the infrastructure the FCC uses). The NTIA is reviewing the project via the FAA aeronautical study, which commenced on March 10, 2022. Depending on what comments are received during the study, we may have a response by the end of April 2022.

Microwave Study

1. The study indicates that the 6 total microwave paths within the 2-mile radius of the proposed turbine willnot be impacted by the installation of said turbine. Applicant shall provide FCC opinion on these findings when it is received.

Borrego Response: This is included in the FAA review (see above). We will provide the FAA filing determination when received.

Visual Impact Analysis – all comments have been addressed

Avian and Bat Mitigation

This statement shows that Borrego plans to comply with all NYSDEC regulations and will have a
pre- construction survey performed by EDR to show pre-construction qualities of the site.
Applicant advises determination from NYSDEC is forthcoming on this information.

Borrego Response: Correct, see response to comment #1 in the General Wind Comment Section.

Summary of Avian Field Surveys

- 1. Two (2) state listed *threatened* species and three (3) state listed species of *special concern* were observed over the course of the study (Spring, Breeding Season, and Fall) in the site location.
- It is believed that one threatened species (northern harrier) occupied breeding habitat on or adjacent to the project site. "Project-related impacts to such habitat could potentially occur depending on locations of proposed Project components."
- 3. It is noted that a Part 182 Incidental Take Permit may be required for the site. Applicant should provide Town with permit or other determination by NYSDEC when it is obtained.
- 4. The study should be submitted to NYSDEC Fish and Wildlife for review and comment prior to a determination being made.

Borrego Response: Study was provided to the NYSDEC on April 1, 2022.

Wind Transport Study – Field Visit Summary Memo

- 1. Summary of material presented in memo two routes were considered from I-90 to the site. Both routes would fall within the jurisdiction of NYSDOT and Montgomery County. Both routes may require the raising or relocating of utilities and it would be the applicant's responsibility to acquire proper permits prior to construction. The independent agency that developed the report does not have a preference or recommendation of the route of delivery vehicles.
- 2. The 290' radius identified in figures is said to be an overhang radius. We believe this appears to represent the trailer inner rear wheel path, as the 165' radius would represent the tractor outer front wheel path. Please confirm as this is the basis for some of the following comments.

Borrego Response: Creighton Manning reviewed the documentation provided by the vendor and confirmed that for the V150 model vehicles, vehicles require a minimum 16 feet of paved width, a minimum widening radius of 150 feet, and a clear area radius of 250 feet for 90-degree turns. Our analysis assumed a widening radius of 165 feet to provide a conservative assumption and result.

- In Figures B1 and B4, delivery equipment R290' radius appears to require additional paving as the
 entirety of the hatched area is not paved. This appears to contradict the opinion that widening would
 not be required for this chosen route.
- 4. In Figure B4, there appears to be a manmade object inside the hatched area that does not appear to be a tree or branch. It is not identified in this imagery. This should be field verified and labeled on the plan.
- Figure B8/G8 seems to show that delivery equipment would need to occupy space off the side of the road. This appears to contradict the opinion that widening would not be required for this chosen route.

Borrego Response: Due to the turbine manufacturers preference for Route I-88, a revised routing memorandum is being completed that will show this new route and make the edge of vehicle vs. clearance areas clearer. The intersections questioned in comments 3-5 will no longer be applicable.

6. The applicant will have to provide a maintenance and protection of traffic plan for the selected route.

Borrego Response: MPT plans will be provided to the Town prior to the scheduled delivery of turbine components. This phase is focused on feasibility and identify locations at which temporary roadway improvements will likely be required. Results can be used for scoping and budget purposes for the effort.

 Weight and loadings do not appear to be considered in this report. These items should be considered before determining the actual improvements that may be required prior to or following installation.

Borrego Response: During this phase of the project, the routing was cross referenced against the NYSDOT bridge database to ensure we were not utilizing any load restricted crossings. During field visits, existing culverts within intersections are noted and will be assessed during design to determine the need for reinforcement, monitoring, or other treatment.

Notes:

- * 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,

Camie Járrell, PE Project Manager

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camie.jarrell@ghd.com

Copy to: Douglas P. Cole, PE – Prime AE

Brandon Smith - Borrego Solar

Attachment

Borrego Solar Wind Project - 411 Reynolds Road, Glen, NY Turbine Construction Costs April 7, 2022

Construction Cost Summary				
	Item Description		Total Cost	
1	Mobilization to Site	\$	88,900.00	
2	Installation/Construction of Turbine	\$	4,417,700.00	
3	Foundation Construction	\$	901,500.00	
4	Excavation, Grading and Construction of Access Roads	\$	133,200.00	
5	Electrical System and Interconnection	\$	295,000.00	
6	Demobilization	\$	86,900.00	
TOTAL CONSTRUCTION COST USE		\$ \$	5,923,200.00 5,925,000.00	