



Albany Office

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P: 518.382.1774

May 28, 2022

Mr. JD Downing, Chairperson
Town of Glen Planning Board
7 Erie Street
Fultonville, NY 12072

Re: Town of Glen
NYS Route 5S Borrego Solar Project
Our Project No. 67-1901

Dear Mr. Downing:

We are in receipt of the revised Stormwater Pollution Prevention Plan (SWPPP) dated June 2022, Comment Response Letter dated 6/24/2022, and Site Use Permit Plans dated 6/24/2022, all as prepared by Borrego Solar. 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 revised documents, we have the following comments:

SWPPP

The SWPPP has been extensively revised due to the site plan changes incorporating the federal wetlands and cattle guard crossing.

1. The page number references are no longer accurate in the Table of Contents due to the additional text added to the body of the SWPPP and need to be updated.
2. Water Quality Management for Water Quality Volumes (WQv) and Runoff Reduction Volumes (RRv) Volumes are proposed to be provided with a combination of open vegetated dry swale with pocket pond, cattleguard weir/wet swale, and sheet flow to natural buffers/filter strips, which are all standard practices accepted by NYSDEC.
3. Water Volume Management is proposed to be provided by a detention pond (berm construction method) in the northwesterly portion of the site and a pocket pond to the north of the wetland system adjacent to the access road. The summary comparison table of pre-development versus post-development runoff rates for the three design storms (1-yr, 10-yr and 100-yr) shows an overall decrease in post-development runoff rates due to the proposed stormwater management practices employed.
4. The SWPPP Preparer Certification page in Section 9 will need to be signed and provided to the Town.
5. NOI comments:
 - a. Question 9a should have the "wetland/Federal Jurisdictional On Site" item selected.
 - b. Question 41 should be answered "yes" as a USACOE wetland permit is required and the size of the impact entered. As per the ACOE letter dated March 9, 2022, the wetland impacts will be authorized under NWP #14.
 - c. The Owner/Operator Certification page needs to be completed.
6. Appendix F – the three (3) Phases in the Construction Site Notice do not agree with the four (4) phases called out in Section 3.3 Construction Sequencing.



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Site Use Permit Plan Set

1. No further comments. All prior comments have been addressed.

Original Conditions of Approval

Below are the conditions of approval that PRIME AE originally recommended for this project.

1. Prior to the issuance of site development and/or building permits by the Town of Glen, the applicant shall obtain a SPDES General Permit for Stormwater Discharges from Construction Activity from the New York State Department of Environmental Conservation (NYSDEC GP-0-15-002).
2. Decommissioning surety to be agreed upon by all parties and provided by owner. Surety to be provided under written agreement with the Town.
3. Decommissioning Cost Estimate shall be updated every 5 years by a N.Y.S. Licensed P.E. and be provided to the Town for review and approval.
4. An approximate fifteen-foot wide vegetative buffer must be retained between the Auriesville Cemetery and the proposed access road and solar panel installation per NYS OPRHP requirements.
5. Completion of SWPPP inspections and reporting during construction shall be performed by a Qualified Inspector and submitted to the Town.
6. The applicant shall consult with Cornell Cooperative Extension to have an appropriate number of soil samples taken within the project disturbance area to properly define the existing soil conditions through testing, so that such pre-construction conditions of prime agricultural land can be reestablished by the project owner at the time of decommissioning. Test results shall be provided to the Town.
7. The existing vegetative buffer must be retained in the easterly fifty-foot setback between the subject parcel and the neighboring Friends of Our Lady of Martyrs Shrine, Inc. property.

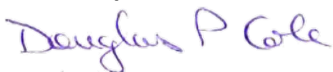
Proposed Additional Conditions of Approval

The three (3) proposed additional conditions of approval from our May 18, 2022 letter have been satisfied.

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

