



Albany Office

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July 21, 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 7/8/2022 and Comment Response Letter dated 7/13/2022 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

1. The Table of Contents has been updated to match the sections of the report; **however, the Applicant should revise the subsection number of “Material Handling and Waste Management” to 6.1 in the Table of Contents and revise the subsection number of “Historic Preservation” to 4.3 in the text of the report.**
2. Borrego stated in the comment response letter that the SWPPP Preparer Certification page will be completed and submitted with the Notice of Intent when the SWPPP is finalized and the project is closer to the start of construction, satisfying our previous comment.
3. NOI comments:
 - a. The “Wetland / Federal Jurisdiction on Site” item is now selected within Question 9a, addressing our previous comment.
 - b. **The area of the wetland impact now shown in response to Question 41 of the NOI does not match the total area shown on the wetland impact figure by Shumaker Consulting Engineering & Land Surveying D.P.C. dated March 2022. The total area shown on the figure, including temporary impacts, is 6,908.36 square feet (0.159 acres). The area shown in Question 41 should be revised to this number and the box should be checked “yes”.**
 - c. The Applicant has written the name of the owner/operator in the Certification section of the NOI and Borrego stated in the comment response letter that the Certification will be signed when the project is closer to the start of construction, satisfying our previous comment.
4. The Applicant updated the construction phases listed in Appendix F to match those listed in Section 3.3 of the SWPPP, addressing our previous comment.

Original Conditions of Approval

1. Borrego stated in the comment response letter that the finalized SPDES permit will be received by the contractor prior to construction and issuance of the building permit, satisfying our previous comment.



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2. Borrego stated in the comment response letter that the decommissioning estimate and surety bond amount was approved by the Town Board on June 13, 2022, satisfying our previous comment.
3. Borrego stated in the comment response letter that the existing buffer to the cemetery will remain and the contractor will maintain a 15' minimum buffer between the project and the cemetery fence, satisfying our previous comment.
4. Borrego stated in the comment response letter that the contractor will provide a qualified SWPPP inspector to perform all required inspection duties, satisfying our previous comment.
5. Borrego stated in the comment response letter that Cornell Cooperative Extension has been consulted, geotechnical testing has been performed, and future geotechnical testing will also be performed in the same spots during decommissioning to meet the decommissioning requirements, satisfying our previous comment.
6. Borrego stated that the buffer between the project and the Shrine will be maintained and no work will be performed within the buffer, satisfying our previous comment.

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

