LaBella
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TO: Daniel Acton, Supervisor, Town of Alfred

FROM: Christopher Centola, Senior Environmental Analyst
Mary Steblein, PE, CPESC, Senior Civil Engineer

DATE: September 2, 2021
RE: NY Alfred I Community Solar Farm Project (Jericho Hill Road Solar)
Review of Site Plan and Special Use Permit Application
LaBella Project No 2212451

Supervisor Acton,

We have reviewed the application, including documents, plans and Stormwater Pollution Prevention Plan (SWPPP), developed by Bergmann Associates, dated 05/28/21, and last revised 7/1/21.

We offer the following observations:

Site Plans and General Comments

There are no demolition or landscape plans included with the submission.

C001 General Notes

- The type of wetland and jurisdiction should be included on the wetland impacts table.

C004 Site Plan

- Show the total area leased by the developer in the site plan data table
- Add the number of panels/modules or racks to the site plan data table.
- Add area(s) of brush/tree removal to the plan and site plan data table.
- Add the limit of disturbance line to the site plan, and add the limit of disturbance area to the site plan data table.
- Change the proposed height of the panel height in the site plan data table to <15'.
- Proposed fence height allowed by solar law is seven feet, not eight feet as shown. If an eight foot fence is proposed, a variance will be required.
- Is the existing asphalt driveway being removed and being replaced with a gravel drive?
- It is difficult to see proposed utility poles near the interconnection.
- Are field posts to remain? Two of them are within the proposed fence line.
- Label the temporary staging and parking areas on the plan.
- Add the hatch pattern of the staging area to the legend.
- Show typical dimension between panels/ modules
- Show distance between panels/modules and fence.
- Show gate width.

C005 Grading Plan

- The proposed LOD, OGE, OHE, & SWL lines are difficult to read at 1” = 100’

C008 Grading Plan Details

- Detail for access road is shown for 0-10% slopes. There are portions of the proposed gravel road that exceed 10% (+/- 3+00, & +/- 10+50).

C012 Details IV

- Change fence height to 7’ above ground.
- The fence details appear to show significant concrete embedment (hatch) along the entire length of the fence. The applicant should review the fence details.

Landscape Plan (Suggested- Not in Plan Set)

- Add buffer plantings in areas indicated. These will increase screening where it appears that it might need some additional plant material.

Photo Simulations

The Photo Simulation locations submitted do not adequately demonstrate the visual impact of the proposed project. We suggest two additional locations to supplement the current photo simulations.

- Provide a photo simulation that includes both leaf on and leaf off for an area north of the site near 77 Pine Hill Drive.
- Provide a photo simulation that includes both leaf on and leaf off at the existing driveway to the site.
- Provide leaf off conditions for the existing photo simulations at existing locations 1 & 2.

Decommissioning Plan

The applicant has submitted the Decommissioning Plan (Appendix 4) that has been provided by the Town of Alfred.

We recommend that as part of a conditional approval, that the applicant provide:

- Acknowledgement of the Town of Alfred Solar Energy Systems and Facilities Local Law, specifically Section 8 (h)3b, and 8(h)3c
- Provide photographs to document the pre development condition of the property.

Operations and Maintenance Plan

The operations and Maintenance Plan addresses all the items listed in I.7.

Stormwater Pollution Prevention Plan (SWPPP)

- The SWPPP/NOI indicates a total disturbance of 14.5 acres, and the plans indicate a limit of disturbance of 30.9 acres. Section IV of Appendix A and the plans also indicate that no more than five acres will be disturbed at any one time. The applicant is requested to provide a potential phasing approach (written or visual) to accomplish this activity. The Construction Sequence should also be modified to reflect the limitation of five-acres disturbed at any one time.
- The NOI indicates 14.5 acres of disturbance and Sheet C006 indicates 30.9 acres of disturbance. Resolve.
- It is noted that the project follows NYSDEC's guidance for solar facilities regarding the use of a pervious gravel access driveway.
- Section D of Appendix A of the SWPPP indicates "the project does not propose any impervious areas on-site." However, we note that there is an approximately 800 SF concrete pad for an inverter. Water quality treatment must be provided for this area (potentially a filter strip may be used to address this). We note the Stormwater Management Report Section III(A) refers to the equipment pads as negligible, however, the NYSDEC Solar Panel Construction Stormwater Permitting/SWPPP Guidance memo clearly indicates these impervious areas must be treated.
- The Contractor and Subcontractor certification should be revised to match the language in GP-0-20-001 Part III.A.6.

MISCELLANEOUS COMMENTS

- Article 8(g) Tree cutting. The removal of existing trees larger than 6" should be minimized to the extent practicable. Has the applicant investigated the existing wooded area and assessed the number of trees with diameters greater than 6"?
- Article 8(i) 4. Preliminary equipment specification sheets. Although there are summaries of some of the equipment listed in the project summary, the applicant has not included specification sheets in this submission
- Provide answers to specific electrical-related questions regarding stray voltage and dirty electricity from Fred Sinclair – Planning Board .

Please feel free to contact our office with any comments or questions you may have in this regard.
We recommend that you forward these comments to the applicant for that they have the opportunity to respond to them prior to the next Board meeting.

Thank you.