

January 15, 2019

Town of Farmington Planning and Zoning Boards  
1000 County Rd. 8  
Farmington, NY 14425

Dear Town of Farmington Planning and Zoning Boards,

Delaware River Solar (“DRS”) is pleased to have the opportunity to bring the benefits of Community Solar to the Town of Farmington. DRS has proposed three Community Solar facilities that will generate, in the aggregate, approximately 7 MW of clean and “green” electricity that will be distributed over the existing electrical grid (the “Projects”).

This letter is in response to the memorandum on January 10, 2019, ***“Identification of requested information that was asked for by the public and the planning board as is documented in the December 5, 2019 Public Hearing Record on the pending Delaware River Solar Applications.”***

We have copied the memo with this letter, and have responded to all questions in line below each question.

We look forward to the January 16th public hearing, and the continued review of our application.

Sincerely,

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Daniel Compitello  
*Project Developer*



DELAWARE RIVER SOLAR  
130 North Winton Road #415  
Rochester, NY 14610

**Memorandum**

TO: Daniel Compitello, Delaware River Solar

FROM: Ronald L. Brand, Director of Planning and Development *Ronald L. Brand*

DATE: January 10, 2019

RE: Identification of requested information that was asked for by the public and the planning board as is documented in the December 5, 2019 Public Hearing Record on the pending Delaware River Solar Applications.

The Planning Board, at their January 2, 2019 meeting, requested a review of the above referenced public hearing record and listing of additional information that was requested at said hearing. I have prepared this list, it has been reviewed by the members and I have been instructed by the Planning Board Chairperson to submit it to you for your response.

1. The Planning Board requests a copy of the Delaware River Solar interconnection agreement with RG&E for the file on this Action.

**DRS Response:**

DRS has provided this information. Please refer to Appendix M of the November 7, 2018 Public Hearing Comment Responses, submitted on November 28, 2018, for all Interconnection Agreements with RG&E relating to the three proposed systems.

2. The Planning Board notes that the land is going to be leased from the Smiths to an ... "Affiliate of DRS." (Page 2 of Appendix I). Therefore, the applicant is to identify who this Affiliate is. In addition, how does this "Affiliate of DRS" affect any decommissioning plan/obligation(s) on the rest of the yet to be agreed upon items?

**DRS Response:**

Under the New York State Department of Public Service (DPS) Standard Interconnection Requirements (SIR) each Community Solar systems in New York State are required to be listed as individual Limited Liability Corporations (LLC). The "New York Farmington I, LLC", "NY Farmington II, LLC", and "NY Farmington III, LLC" were each created by Delaware River Solar, and each respectively refer to the more easily referenced project names of Yellow Mills Road Solar I, II, and III. Each are wholly owned subsidiaries of Delaware River Solar, LLC. All decommissioning

obligations of each system will be carried by Delaware River Solar, and the respective subsidiary company names of each system.

3. The Planning Board requests the applicant to describe what... “the needs of the farm operation” is going to be for the Smiths over the life of the lease agreement for the solar panels operations on their lands.

**DRS Response:**

Please refer to the updated Preliminary Landscape Plan submitted on January 9, 2019. DRS has worked with the landowners to design the systems so that both the existing cattle farm and solar systems can co-exist on the land. This requires DRS to realign the pasture fences on the land prior to construction. A general construction phasing plan has been designed with the landowner to ensure cattle will have ample acreage to graze during and after construction. This plan is dependent on the season in which construction will commence, and so is preliminary at this time. It can become final prior to seeking building permits, when the season for construction commencement is better known.

The needs of the farm that are impacted by the solar systems relate to grazing land availability, and safe cattle movement from the grazing land to and from the barn, during and after construction. Cattle pasture fences, movement paths and gates, circulation areas, and adequate grazing fields are designed with this plan, which has been approved by the landowner.

4. The Planning Board needs to understand how the two calculations that have been used for determining the amount of land occupied by panels has been determined and then the remaining green space on each parcel. For example, if one calculation is used for flat panels then it appears to be 9.6 acres of panels per parcel. The applicant is calculating the occupied portion of each site to be 3.39 acres of land.

**Schultz Engineering Response:**

Please see “Appendix A – 12-5 – Lot Coverage Calculation Sheet” which shows the necessary calculations for all 3 systems. Lot 3 (PV System 2) has the smallest total lot area at 15.235 acres and therefore will have the highest lot cover percentage.

As shown in the most current Project Memorandum, Section 2.4.3 Supporting Structures, Table 5, the length of the proposed rack is 45.6’ and the horizontal width is 12.2’. Note that the horizontal width is not the same as the face of the panels that are set on an angle. The area of one rack is  $45.6' * 12.2' = 556.3$  square feet. Each PV System has 250 racks.

The area of racks within one system is  $250 * 556.3SF = 139,080$  square feet (3.193 acres). Each system has some additional lot coverage from either the temporary construction drives within the system, the main access drive, the temporary construction facilities or the inverter pads. PV System 2 has approximately 0.23 acres of lot coverage which are not the racks. The total area of racks and the other lot coverage is 3.193 acres + 0.23 acres = 3.423 acres. The percent of lot coverage on Lot 3 (PV System 2) is determined by dividing the area of cover by the lot area,  $3.423 \text{ acres} / 15.235 \text{ acres} = 22.4\%$ . The amount of remaining green space on the lot is  $100\% - 22.4\% = 77.6\%$ .

Note that the total area within the solar fence for the entire project is approximately 29.9 acres. Each row of racking systems is 12.1' wide and each grass pathway between the racks is 19' wide. Only looking at the land inside the fence line there is 65%+/- green space.

5. The Planning Board requests a detailed landscaping plan be submitted identifying what landscaping and planting schedule is being proposed for the frontages along Fox Road and Yellow Mills Road.

**DRS Response:**

Please refer to the updated Preliminary Landscape Plan submitted on November 28, 2018, and updated on January 9, 2019. Plant species and planting locations are described in this plan. A Final Landscape Plan, and planting plan can be created after more input is received on this plan.

6. DRS had stated at a previous public hearing that they would provide photographic evidence of a solar farm with 21,000 panels. To date they have not provided this photograph. Therefore, the Planning Board is requesting this documentation be provided.

**DRS Response:**

Please refer to images attached with this memo in Appendix B – 12-5 – Pictures of Solar Farms 5 to 9MW in Size, as well as the Photo Simulations of the proposed solar systems.

7. It has been asserted by a resident, that “someone” will have to swish the snow off the solar panels in winter months. Is this a true statement, or not? If it is true how does this swishing of the snow off the panels occur?

**DRS Response:**

DRS will employ qualified local maintenance workers to maintain the solar systems. If heavy snowfall blocks sunlight from reaching the panels, this maintenance can include brushing snow off panels with hand tools similar to how snow is brushed off parked cars. Sunlight can penetrate snow up to several inches, and in some cases light traveling through snow can increase the refraction and intensity of light absorbed by the panels. Snow can also melt and fall into the rows between the panels, and so, snow removal from the surface of panels is a rare need.

8. The Planning Board is requesting identification of the Environmental Manager (EM) for this project? In addition, what will this individual, when will this person start work? How often will the EM be on site during construction and then during operations? What qualifications and experience does the selected EM possess?

**DRS Response:**

DRS will employ an Environmental Manager in accordance with the 2017 Solar Law and New York State Agriculture and Markets solar siting guidelines. The qualifications of the EM will be provided for review when one is selected, and before building permits are obtained, and will meet all standards set forth by the New York State Division of Agriculture and Markets (AGM). This individual will begin work when construction activity begins, and will be onsite as required by the AGM standards.

Town Code Section 165-65.3.6(1)[b](3)[a] requires the EM to be on-site whenever construction or restoration work is occurring on the Class 1 through 4 soils. The responsibilities of the EM will include overseeing the construction, restoration and follow-up monitoring in agricultural fields, coordinate with the OCSWCD and NYSDAM to develop an appropriate inspection schedule, ensure vehicles and equipment stay within the designated work area, and determine the appropriate mitigation for any surface or subsurface drainage problems caused by construction.

9. The Planning Board is requesting clarification upon the State’s declared efforts to reach 50 percent renewable energy by 2030. Is this a goal, or a mandate? Please explain the differences between these two terms.

**DRS Response:**

In 2016, New York State issued the 50X30 mandate. Quoting the State, this is “the most comprehensive and ambitious clean energy mandate in the state's history, to fight climate change, reduce harmful air pollution, and ensure a diverse and reliable energy supply. The Clean Energy Standard will require 50 percent of New York's electricity to come from renewable energy sources like wind and solar by 2030, with an aggressive phase in schedule over the next several years.”

Please refer to the full Governor’s press release: “First-ever State Mandate will More than Double Renewable Resources, Slash Carbon Emissions, Protect the Environment and Grow the Clean Energy Economy”, August 2016

<https://www.nyserda.ny.gov/About/Newsroom/2016-Announcements/2016-08-01-Governor-Cuomo-Announces-Establishment-of-Clean-Energy-Standard>

According to Webster’s dictionary, a goal is defined as: “the end toward which effort is directed”; and a mandate is defined as: “to officially require (something)”. The 50X30 clean energy mandate is a requirement that all New York State communities must fulfill together.

10. It has been alleged by residents that Delaware or the Smiths have to produce their proof that the only feasible alternative for this land is a solar plant and then they have to show why it is the only feasible alternative. The Planning Board has asked the Town Code Enforcement Officer for an interpretation on this issue. The Planning Board now asks the Applicant’s Attorney to also provide a legal opinion of this need.

**DRS Response:**

Please refer to the letter “Alternative Definition letter” provided by Boylan Code, LLP and submitted on January 9, 2018.

11. The Planning Board would like to know if the decision by Delaware River Solar is based upon the remaining capacity of the nearby RG&E Substation to only be able to accept an additional 7MG source of power without having to expand the utility’s facility.

**DRS Response:**

It is assumed the term “7MG” refers to 7 Mega Watts of power, or 7MW. As described in the November 7, 2018 Comment Responses, submitted on November 29, 2018, the interconnection agreements made with RG&E dictate what type of connection may be made, and what amount of power may be interconnected within the capacity that RG&E deems is available in their infrastructure. DRS is a separate company than RG&E, and does

not control or govern RG&Es decisions on what amount of capacity they deem is acceptable to interconnect. The decision to develop 7MW of capacity is based on the injection capacity rated by our interconnection agreements into the RG&E grid. Were more land available for development beyond 7MW of capacity, DRS, or any landowner, could request RG&E to study upgrade costs to the substation.

12. The Planning Board would like to know if the nearby RG&E Substation could be economically expanded by installing lithium battery storage units similar to those units being installed at the RG&E Hook Road Substation. If so, what then would be the maximum capacity of the nearby RG&E Substation to accommodate additional energy from a solar farm?

**DRS Response:**

DRS is not able to answer this question, or speak on behalf of RG&E. RG&E owns and operates the substation, not DRS. Any planning for this substation is governed by RG&E. DRS is not aware of any plans RG&E has to upgrade the utility's substation other than to allow interconnection from the Yellow Mills Road solar systems.

13. The Planning Board asks the applicant to explain how this solar farm project is consistent with the goals, objectives and policies contained in the adopted 2011 Edition of the Town of Farmington Comprehensive Plan.

**DRS Response:**

All aspects of the solar systems are consistent with the 2011 Comprehensive Plan, and the 2017 Solar Law that was written and adopted to be consistent and in harmony with the 2011 Comprehensive Plan. Any new development application adhering to the 2017 Solar Law implicitly implies that it also adheres to the Comprehensive Plan.

Here are notable sections of the Comprehensive Plan which the solar systems are consistent with:

**Chapter 1 – Executive Summary –**

- i. **Sustaining Quality of Life.** *“Green Energy Concepts and Principles”* and being conscious of energy costs, are explicitly referred to as guiding principles of the Comprehensive Plan. The solar systems positively impact these criteria by providing locally generated, affordable, clean energy.

- ii. **Agricultural Issues** – The creation of the Farmland Protection Plan, and the adoption of the 2017 Solar Law to be in harmony with the Farmland Protection Plan, show that the drafting of the solar law took into consideration the impacts of solar systems on the agricultural character and assets of the Town. The solar systems positively impact these criteria by co-existing with the landowner’s farm, any by supporting their farm through lease payments and newly designed pasture fields.

### **Chapter 3 – Goals, Objectives, and Recommended Actions –**

- i. **Goal 2 - Managing the Built Environment** – *“Improving the quality of the built environment by focusing growth so as to provide for the needs of Townspeople”* is directly addressed by building clean energy solar systems that can serve large portions of town energy needs. Yellow Mills Road solar systems can power 1,100 to 1,200 homes, nearly 20% of town resident electricity needs.
- ii. **Goal 3 - Conservation, Open Space, and Environmental Protection:** *“To preserve the natural environment and protect it from degradation.”* Unlike permanent developments like homes, buildings, or roads, solar systems are designed to be semi-permanent developments that can be removed and decommissioned, returning the land to its current state, and they do not impact wetlands or surface features. Solar systems are in a way, a short term land bank which preserves and fallows the land they reside on, allowing soils of any quality to be recharged in the same way that up to 30 percent of all agricultural land is regularly fallowed across the state annually.
- iii. **Goal 4a, and 4c** – The Economy and Associated Land Uses:
  - a. **Goal 4a.** – *“To promote a stable and diverse local economy.”* The solar systems will produce clean, affordable energy available to local residents at a discount to current energy prices. The systems will generate additional tax revenue that will support Town functions. The lease payments will support the landowner and their farming business and family.
  - b. **Goal 4c.** – *“To enhance agricultural viability and preserve agricultural land resources.”* In addition to meeting Goal 3, the lease payments will support the landowner and their farming business and family. The solar systems are



designed to co-exist with the current farming activities on the land – the solar systems will not impede these activities and will enhance them.

14. The Planning Board would like to learn more details about how a dollar amount is established as surety for the decommissioning of the proposed solar farm. Who monitors the periodic investments made to this surety and how is the Town able to use the surety to decommission the site?

**DRS Response:**

Please refer to Appendix K of the November 7, 2018 Public Hearing Comment Responses, submitted on November 28, 2018, for the Decommissioning Package, which outlines a draft decommissioning proposal and cost estimates. A dollar amount for decommissioning is typically based on the cost of labor to decommission, and the waste, salvaging and recycling costs, and the cost for any grading or earth work needed to return the land to a certain post-removal condition.

According to the 2017 Solar Law, details of this plan can be further refined upon input from the Planning Board and Town Engineer during Special Use Permit review. It is normally the Town or acting holder of the decommissioning surety, and the issuer of the surety, that monitor periodic investments made to a surety, if they are required. A final Decommissioning Agreement will outline how the Town can use the surety, if ever needed, once these details can be reviewed by the Planning Board and Town Engineer, and agreed to by the Town Board. Should the Town ever need to use the surety, it would be used to fulfill the Decommissioning Plan.

15. The Planning Board would like to know whether it is the property owner who will be ultimately responsible for the clean-up of the decommissioned solar farm site, or who will be responsible? If it is to be the property owner, are they identified as part of the surety for the decommissioning?

**DRS Response:**

Please refer to Appendix K of the November 7, 2018 Public Hearing Comment Responses, submitted on November 28, 2018, for the Decommissioning Package, which outlines a draft decommissioning proposal. DRS as the owner of the solar systems will be ultimately responsible for decommissioning, unless the decommissioning surety is exercised by the holder of the surety.

16. The Planning Board would like the applicant to explain whether this 7MG solar farm allows any other landowners being served by the RG&E Substation to also enter into an agreement with the utility provider? Or, does this application closeout any other landowner from a separate solar farm application?

**DRS Response:**

DRS assumes 7MG refers to 7 Mega Watts, or 7MW for short. At this time, the maximum interconnection capacity for Community Distributed Generation (CDG) infrastructure, as reported by RG&E, will be filled once the Yellow Mills Road solar systems are connected to the RG&E grid. Additional connection requests can be made to RG&E by other landowners, and RG&E would inform them through studies as to what further connections can be made, with necessary upgrades.

17. The Planning Board would like the applicant to identify what types of chemicals are to be used within the solar panels and whether these materials are hazardous. In addition, verify that the outside surface of the panels/arrays will not be cleaned with chemicals. If not chemicals, how will they be cleaned?

**DRS Response:**

Please refer to Appendix I of the November 7, 2018 Public Hearing Comment Responses, submitted on November 28, 2018, for the Jinko TCLP Solar Panel Test, which outlines the chemical composition and leachate tests performed on the typical solar panel DRS uses.

Water sprayed in the form of rain, or brought in by truck, is used to clean solar panels.

18. The Planning Board requests a specifications sheet on a typical solar panel detailing any hazardous materials contained and the amount of the hazardous materials. In addition, who will be cleaning these panels and how frequently are they to be cleaned?

**DRS Response:**

Please refer to Appendix H and I of the November 7, 2018 Public Hearing Comment Responses, submitted on November 28, 2018, for the Specification Sheet of typical solar panels used, and Jinko TCLP Solar Panel Test, which outlines the chemical composition and leachate tests performed on the typical solar panel DRS uses.

DRS will employ qualified local maintenance workers to clean panels, and they will be cleaned as frequently as needed to maximize the energy production of the solar systems. Solar farms are normally cleaned two times per year or as needed.

19. The Planning Board would like the applicant to address the issue of whether photo voltaic (PV) arrays create a seasonal microclimate during the summer and during cool and dry weather. Is there a correlation to the size of the solar panels, or the amount of power being generated?

**DRS Response:**

Regarding the first question on micro-climates, a microclimate is defined by the Webster Dictionary as “ the essentially uniform local climate of a usually small site or habitat”. All features of the built and natural environment effect microclimates. The solar systems will generate marginally more surface heat during the day than the pasture land they will cover, but they will also create shade under them which cools the panels, and balances this heat, and they will not be able to produce microclimates noticeably different than those that naturally exist from the parcel.

A good amount of study has been done on microclimate effects from solar arrays. Please refer to the National Renewable Energy Laboratory report, **“Native Vegetation Performance under a Solar PV Array at the National Wind Technology Center”**, which addressed “how constructed PV arrays affect ground-level environments, and to what degree plant cover, having acceptable characteristics within engineering constraints, can be re-established and thrive.”

As quoted from this study: “Conditions under PV modules were tested by monitoring air temperature, relative humidity, wind speed, soil temperature, crop temperature, and incident radiation in Marrou, Guilioni et al. (2013). Over the course of the experiment, the daily average air and crop temperature, relative humidity, and pressure deficit were comparable in shaded areas when compared to full sun plots. However, soil temperature was greatly reduced in the shaded treatments, and balance of incident radiation was different in shaded areas than in full sun (Marrou, Guilioni, et al. 2013).”

This study may be accessed online at:  
<https://www.nrel.gov/docs/fy17osti/66218.pdf>

Regarding the second question. There is a correlation to the size of solar panels and the amount of power they can generate. A good source for this explanation is the Solar Energy International, "Solar Electric Handbook", 2004 through 2019, which is the industry standard training manual for solar energy workers. The wattage rating of a solar panel determines the amount of power they can generate by converting light into electricity. This rating is calculated by the amount of surface area of the panel, and the light absorbing photovoltaic elements within that surface area. A higher wattage panel may be larger than a lower wattage panel, and this is dependent on the efficiency and capacity rating of the panel.

DRS typically uses 300 to 350 watt panels. Most panels in these wattage ratings are similar in size. Please refer to the November 7, 2018 Comment Responses, submitted on November 28, 2018, for a specification sheet of the typical panels used.

20. The Planning Board would like the applicant to provide documentation on what the noise level(s) will be from the solar inverter. Both at the inverter and at the closest property line.

**DRS Response:**

DRS proposes to use an inverter similar to the INGECON SUN PowerMax UB Series which has an "Acoustic Emission" of <66 decibels (db) at 33 feet per the manufacturers information. The inverter product specification sheet is attached as "Appendix C - 12-5 - Typical Inverter Spec Sheet". The Inverse Square Law is used to determine the noise level at the nearest property line.

Inverse Square Law:

**DSPL = 20 log(D2/D1), where**  
DSPL = the change in sound pressure level  
D1 is the reference distance (33 feet)  
D2 is the desired distance (698.5 feet from the Inverter of PV System 1 to Fox Road)  
DSPL = 20 log (698.5/33)  
DSPL = 26.5 db

At 698.5' the noise level will be 39.5 db (66 db – 26.5 db = 39.5 db)

Please refer to "**Appendix D – 12-5 – Decibel Scale**", for a range of decibel levels from common sources of noise. 40 db is less than the sound that a refrigerator makes. Therefore, the predicted noise level from the

proposed inverters should have no effect on ambient noise levels in the neighborhood.

21. The application states “minimal noise and no nighttime noise.” The Planning Board requires the applicant to provide the decibels levels associated with the operation of the inverter units and the hours these units will operate each day. These decibel levels are to be at the inverter units locations on the property and at nearby property lines. In addition, the Planning Board wants to know do the inverters operate only during daylight hours, or at other times. If at other times, then describe what those are.

**DRS Response:**

Using the Inverse Square Law, the same as in response #20, the following noise levels are predicted at the property lines.

- North property line: At 698.5 feet from the inverter, the noise level will be 39.5 db
- East property line: At 877 feet from the inverter the noise level will be 37.5 db
- South property line: At 889 feet from the inverter, the noise level will be 37.4 db

40 db, equivalent to a refrigerator running, and the inverters are located within array rows, which will absorb and dampen the noise. The inverters operate only when there is sunlight and the solar system is generating power that is sent through the inverter. The inverter treats the energy, and converts it from Direct Current, to Alternating Current, and uses a cooling fan to do this. Without sunlight there is no energy to be converted, and the inverters do not operate. Full moonlight does not generate enough power within the solar system to engage the inverter, and so, no night time operation of the inverter will occur.

22. The Planning Board requests the applicant to answer how deciduous trees are going to provide an effective year-round buffer, or as screening of the panels from along the public ways?

**DRS Response:**

Please refer to the Preliminary Landscape Plan, and Photo Simulations which show where additional planting is proposed to strengthen existing vegetative screening, or provide screening where none currently exists. Some areas of existing treed areas are dense enough to adequately screen from public roadways, and others are not. The Landscape Plan seeks to address views that the Town wishes to be screened, and DRS welcomes comments and guidance on the landscape plan design. Some

Town's prefer to see solar arrays, and others do not. We wish to rely on the preference of the Planning Board to inform the design, and have offered to meet with neighbors to do this as well.

23. The Planning Board requests documentation as to where the off-site monitoring of the panels be performed? What type of internet connection will be used?

**DRS Response:**

Like all energy infrastructure owners, DRS must conform to National Energy Regulatory Commission (FERC) rules on system monitoring, and cannot disclose the location where this is performed. Typical monitoring connections can include telephone, cellular or satellite connections.

24. The Planning Board requests documentation of what lighting will be used on the site and where is it going to be located? Will it be motion-activated? In addition, the applicant is to provide illumination pattern(s) for all site lighting.

**DRS Response:**

No lighting has been proposed onsite, and no lighting is required to be used onsite.

25. The Planning Board requests documentation that answers will all damaged panels be removed from the site? If so, how soon after discovery. Will all residue from the damaged panels be cleaned on the site, or removed from the site without being cleaned?

**DRS Response:**

Damaged panels, and any damaged materials or residue will be removed from the site and properly disposed of or recycled. DRS will be alerted to damaged panels via remote monitoring, or, from site inspections or both, and will work to replace panels as quickly as possible to maintain system operations and performance standard requirements.

26. The Planning Board requests documentation that will verify that only panels that pass the TCLP test will be used on this project?

**DRS Response:**

DRS commits to using only panels that pass the TCLP test in all solar systems we develop.

27. The Planning Board requests documentation that there are no other landowners located along the RG&E interconnection route who were willing to lease land their lands to Delaware River Solar.

**DRS Response:**

According to company policy, and to preserve the integrity of our neighbors rights, DRS will not disclose the identity or intention of landowners with whom we do not enter a land lease with to develop a solar system.

28. Appendix I is confusing and raises questions. Although it may meet “EPA Regulations,” the Planning Board requests documentation as to what are the actual concentrations of waste materials associated with the proposed solar farm operation.

**DRS Response:**

DRS commits to using only panels that pass the TCLP test in all solar systems we develop. Please refer to 4.4 of the Decommissioning Plan for a list of materials used in the solar system. Any waste generated from the system during construction, operations, or at decommissioning will be properly disposed of, reused, or recycled. As the decommissioning plan is further reviewed by the Planning Board and Town Engineer in Special Use Permit review, an independent Decommissioning Cost Estimate can be produced that lists each material and the cost of decommissioning, to quantify the total waste produced at decommissioning.

29. Although the applicant has provided a photo simulation of views from different angles along both Fox Road and Yellow Mills Road, the Planning Board agrees with the residents concerns that the photos submitted do not adequately identify the visual impact(s) this project will have. Therefore, additional photo simulations are requested to be provided. These simulations are to be from along the frontages of the property.

**DRS Response:**

Please refer to the Preliminary Landscape Plan, and Photo Simulations updates, provided on 1/9/2019, and produced by Saratoga Associates. The Photo Simulations include 2 new additional vantage points that proactively addressed this request from public comment, and provide simulated views from the property frontages of Fox Road and Yellow Mills Road. Notably, these images are similar to those previously produced,

and all simulations show an accurate depiction of the solar systems when built.

Note: The Planning Board's calculation of site coverage is based upon their understanding that there is to be a total of 28 modules per array/rack, 250 arrays/racks per parcel. Each array/rack is 45.7 feet x 12.2 feet.

RLB:btb

c: Farmington Planning Board Members  
James Morse, Town Code Enforcement Officer  
Jeffrey Graff, Attorney to the Town  
Farmington Zoning Board of Appeals Members  
John Robortella, Clerk of the Boards  
Peter Dolgos, Delaware River Solar, New York City, New York  
Donald Young, Boylan Cole Attorneys, Rochester, New York  
David Matt, P.E., Schultz Associates, P.C.