

July 14, 2020

Mr. Ronald Brand  
Director of Planning & Development  
Town of Farmington  
1000 County Road 8  
Farmington, New York 14425

**RE: DELAWARE RIVER SOLAR, LLC – YELLOW MILLS RD SOLAR FACILITY  
PRELIMINARY SITE PLAN, SWPPP, DECOMMISSIONING, OPERATIONS, & MAINTENANCE PLAN  
MRB PROJECT NO. 0610.12001.000 – PHASE 086  
PB -1004-18 & 1006-18**

Dear Mr. Brand:

MRB has completed a review of the submitted Preliminary Site Plan dated July 3, 2018, last revised October 21, 2019 and Stormwater Pollution Prevention Plan (SWPPP) dated October 2019 prepared by Schultz Associates. We have also completed a review of the submitted New York Community Solar Facilities Decommissioning Plan, dated June 2020, Version 5 and the New York Community Solar Operations and Maintenance Plan dated February 2020, Version 2, prepared by Delaware River Solar, LLC. We offer the following preliminary comments for the Planning Boards consideration. A brief written response to each comment should be provided by design engineer.

**SUBDIVISION PLAT**

1. If not done so already, the subdivision plat plans are to be signed.

**SITE PLAN AND GENERAL COMMENTS**

2. The plans are to be updated to identify the proposed clearing and limits of disturbance boundaries. These boundaries should be shown on the plans and labeled with the associated acreages.
3. A detail of the proposed perimeter fence is to be provided. Also if a gate is proposed, the location(s) should also be identified on the plans and a detail included.
4. Proposed fencing is currently shown intruding into the 100' state wetland buffer on the west side of sheet S-1. Please note that if work is to occur within this buffer then an approval/ permit will from NYSDEC is to be provided.
5. Are any signs proposed as part of this project? If so, the locations of all signage are to be shown on the plans and a detail of such signs included.
6. Dimensions of the concrete pads should be labeled on the site plans.

7. The plans are to be updated to include a trenching detail for the proposed electrical conduit.
8. The access road dead end which are greater than 150' from an intersection shall be provided with a hammer head turnaround. A detail is to be included on the plans. Please refer to the Town of Farmington Site Design and Development Criteria.
9. All entrances should be labeled with recorded sight distances.
10. All portions of the access roads located within the Town R.O.W. are required to be of a paved surface as required by the Town of Farmington. The existing farm access road should be labeled with this note.
11. The Planning Board should consider requiring the height of the proposed Arborvitae be 6-8' tall at planting to further screen the solar array.
12. Additional screening in the form of evergreens should be considered along Fox Road to screen the proposed solar array, the access roads, and transformer pad areas.

**DESIGNATION OF ENVIRONMENTAL MONITOR & STATEMENT OF DUTIES**

13. The Health & Safety inspection report is to be distributed to the Town of Farmington as well as the identified stakeholders. Listed. Please update this to include the Town of Farmington.

**DECOMMISSIONING PLAN & OPERATION AND MAINTENANCE PLAN**

14. Section 1, paragraph 4, the removal of power poles and overhead wiring should be identified as being part of the decommissioning plan, regardless of who's responsible.
15. Page 4, number 5, under Decommissioning and removal, this section is to be updated to include the removal of utility poles, overhead wiring, signage (if any), roadway entrances, and landscaping.
16. The plans are to be revised to address the Director of Planning & Development comments.
17. The following comments pertain to the decommissioning cost estimates:
  - a. The note which states "combined estimate, unit rates have been reduced where applicable..." should be removed from all of the estimates. The estimates provided for each lot and the overall combine should use the same unit cost (higher cost).
  - b. Each of the cost estimates are to include a cost for road repair (Town Roads) incase damaged during decommissioning of the site.
  - c. The unit price for PV Modules decreases to \$0.40 on the combined estimate whereas on the individual estimates it's at \$0.50 each. The

combined estimate is to be revised to match the individual estimates at \$0.50.

- d. The unit price in the combined estimate for a number of line items appears to be less than as shown on the individual estimates. The combine estimate is to be revised to increase the unit prices to match the unit prices shown for the individual estimates.
- e. The total of the combined estimates should be \$257,591.00. Please revise and resubmit.
- f. Overhead wires and utility pole removal should be added to the estimates.
- g. Two of the proposed facilities do not appear to be separated by any internal fence and share a common perimeter fence. The estimates for these facilities should include an item for relocating and/or installing new perimeter fence to provide security for the remaining facility in the event of one facility remaining.

#### **SWPPP**

18. Page 1 of the SWPPP indicates that the project will utilize 38 acres of land, and that the leased area will be 37 acres. It also identifies that the parcel area is 135.4 acres, and that the owner controls 156.6 acres of land. Please clarify these discrepancies.
19. It is our understanding that post or pile mounted solar arrays achieve stormwater treatment by providing filter strips between panel rows which are of greater area than the panel rows themselves. As such, the SWPPP should include a description and typical detail which demonstrates that the vegetated area between panel rows meets or exceeds the width of each panel rack at its maximum horizontal extents.
20. The SWPPP states that the concrete pads will achieve the required stormwater treatment through the use of filter strips. The plans should delineate the filter strip areas utilized for treating the concrete pads. The SWPPP should include calculations and detailing which demonstrates that the filter strip areas will meet or exceed all required criteria and are adequately sized to treat the pads.
21. The erosion and sediment control standards and specifications pages from the NYS Standards and Specifications for Erosion and Sediment Control should be replaced with the most up to date version (November 2016).
22. Both the pre-development and post-development drainage maps should show the boundaries of the subcatchment areas listed within the HydroCAD subcatchment summary pages, and should show the TC flow paths and delineate each segment.

23. While it is not anticipated that the concrete pads would have significant impacts to hydrology, for completeness and thoroughness of the analysis, the concrete pads should be included in the post-development hydrology modeling.
24. The Qualified Inspector Form should be replaced with the Town of Farmington Stormwater Inspection Form.
25. The USDA soil survey descriptions for all soils on site should be included within the SWPPP.

Please feel free to contact our office with any comments or questions you may have in this regard. Thank you.

Respectfully submitted,



Lance S. Brabant, CPESC  
Director of Planning & Environmental Services

- C     Ed Hemminger, Planning Board Chairman  
       Planning Board Members  
       Dan Delpriore, Code Enforcement Officer  
       Don Giroux, Highway Superintendent  
       Robin MacDonald, Water & Sewer Superintendent  
       Matt Heilmann, Construction Inspector