

September 4, 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  
REVISED SITE PLAN, SWPPP  
MRB PROJECT NO. 0610.12001.000 – PHASE 086  
PB -1004-18 & 1006-18**

Dear Mr. Brand:

MRB has completed a review of the submitted Revised Preliminary Site Plan dated July 3, 2018, last revised July 28, 2020 and Stormwater Pollution Prevention Plan (SWPPP) dated October 2019 prepared by Schultz Associates, last revised July 30, 2020. We offer the following comments for the Planning Boards consideration. A brief written response to each comment should be provided by design engineer.

**SITE PLAN AND GENERAL COMMENTS**

1. A sheet named Erosion and Sediment Control should be added to include silt fence layout, topsoil stockpile locations with silt fencing, the limits of disturbance, and all other erosion and sediment control measures being utilized. All erosion and sediment control measures should be done outside the wetland buffer. Please note that if work is to occur within this buffer then an approval/ permit may be required from NYSDEC.
2. Proposed fencing is currently shown intruding into the 100' state wetland buffer on the west side of sheet S-1. There should be no overlap of the fencing and the buffer to comply. Please note that if work is to occur within this buffer then an approval/ permit will from NYSDEC is to be provided.
3. Concrete pads detail should be added to the plans not just the SWPPP.
4. 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.

**SWPPP**

5. Page 1 of the SWPPP indicates that the project has a total area of disturbance of 38± acres of land, and that the leased area will be 37 acres. Please clarify these discrepancies.

6. 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.
7. 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).

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

8. 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**

9. 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.
10. 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.
11. The plans are to be revised to address the Director of Planning & Development comments.
12. 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.

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