

T.G. MILLER, P.C.

ENGINEERS AND SURVEYORS

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April 26, 2017

Jason Leifer, Supervisor
Town of Dryden
93 East Main Street
Dryden, New York 13053

Re: Solar Photovoltaic Plants
2150 Dryden Road and Ellis Tract
SUN8 PDC, LLC
State Environmental Quality Review

Dear Supervisor Leifer,

Based on our review of the numerous studies, drawings, analyses and applicant correspondence we recommend the Town Board receive the following documentation from the Applicant to supplement the Full Environmental Assessment Form and inform the determination of significance.

2150 Dryden Road

1. Provide a response from NYSOPRHP that the Phase 1 Archaeological Survey is deemed complete and no further resource investigations will be required.
2. Provide a response from both USACE and NYSDEC that proposed disturbance impacts within or adjacent to the mapped and recently delineated wetlands are 'non-jurisdictional'.
3. Provide a response from USFWS for review of the project and concurrence for "incidental taking of wooded habitat" for the Northern Long Eared Bat. Confirm that submitted material to USFWS is consistent with the most recent revised site plans.
4. The Habitat Assessment and Preliminary Impact Determination dated April 10, 2017 includes information specific to the Northern Long Eared Bat. Complete a field evaluation and submit an expanded Habitat Assessment and Preliminary Impact Determination Report to include any species of plant or animal that are listed by NYS as rare, or as species of special concern that have not previously been identified in NYSNHP records.
5. Revise the site plans to incorporate alterations and modifications agreed upon by the Applicant as of April 26, 2017.
6. Update the FEAF to be consistent with the latest information submitted.
7. Provided a revised SWPPP narrative and run-off curve number calculation that is consistent with revised site plans.

Ellis Tract

1. Provide a response from NYSOPRHP that the Phase 1 Archaeological Survey is deemed complete and no further resource investigations will be required.
2. Provide a response from both USACE and NYSDEC that proposed disturbance and conversion impacts within the mapped and recently delineated wetlands are 'non-jurisdictional'.
 - a. Quantify the total acreage of wetland footprint that will be utilized for solar panel installation.

David A. Herrick, P.E.
Frank L Santelli, P.E.
Andrew J. Sciarabba, P.E.

Steven R. Rowe, P.E.
Dondi M. Harner, P.E.
LEED A.P., C.P.E.S.C.

Lee Dresser, L.S.
Darrin A. Brock, L.S.

3. Provide a response from USFWS for review of the project and concurrence for “incidental taking of wooded habitat” for the Northern Long Eared Bat. Confirm that submitted material to USFWS is consistent with the most recent revised site plans.
4. The Habitat Assessment and Preliminary Impact Determination dated April 11, 2017 includes information specific to the Northern Long Eared Bat. Complete a field evaluation and submit an expanded Habitat Assessment and Preliminary Impact Determination Report to include any species of plant or animal that are listed by NYS as rare, or as species of special concern that have not previously been identified in NYSNHP records.
5. Based on the Tompkins County Scenic Resources Inventory the Ellis Tract is located within a Noteworthy View. Provide a view simulation depicting the solar panels and vegetative screening. Provide an official response from the Ithaca Tompkins Regional Airport relative to glare analysis for air traffic.
6. Revise the site plans to incorporate alterations and modifications agreed upon by the Applicant as of April 26, 2017.
7. Update the FEAF to be consistent with the latest information submitted.
8. Provided a revised SWPPP narrative and run-off curve number calculation that is consistent with revised site plans.

I will be attending the public meeting this evening and look forward to addressing your questions.

Respectfully,

A handwritten signature in black ink, appearing to read "David A. Herrick". The signature is fluid and cursive, with the first name being the most prominent.

David A. Herrick, P.E.

Cc: Ray Burger, Director of Planning