

**Dave Herrick,**

Principal – T.G. Miller, P.C.

**Ray Burger,**

Director of Planning, Town of Dryden

Sub: Clarifications pursuant to comments from June 28, 2017

Mr. Herrick and Mr. Burger,

Please accept the following clarifications as an addendum to our submittal dated June 1, 2017. These clarifications incorporate responses to questions and comments from T. G. Miller, P.C. (“TGM”).

**Ellis Tract and 2150 Dryden Road Projects:**

**1. Tree removal in general.**

SUN8 appreciates TGM’s concern in general over tree clearing. Our standard protocol has been to present the impact associated with potentially clearing all areas shown on the drawings. Our team ultimately prefers to only clear trees that are deemed to be either a fall hazard or pose a shading concern, within permissible environmental constraints. Consistent with its normal approach, SUN8 agrees to review each grove of trees for potential fall hazards or shading concerns before clearing; only those trees that fit the criteria of either being a fall hazard or a shading concern will selectively be removed. Outside the fenced area, we do not anticipate that the stumps need to be removed. Cornell Botanic Gardens has recommended that newly cleared areas be seeded with a pollinator-friendly seed mix to foster birds and insects that may use the area. We have also agreed to cooperate with Cornell University and the National Renewable Energy Laboratory to allow them to research the suitability of certain native seed mixes to local pollinator groups in and around the solar arrays. Several researchers at Cornell University have also expressed an interest in the same topic.

As stated in the long-form SEQR, clearing within delineated wetlands will be performed by non-mechanized means.

**2. Designation of proposed tree clearing areas & methods.**

Of all proposed tree clearing areas, there are two principal areas that SUN8 has designated to follow specific protocol – trees with potential habitat for the Northern Long Eared Bat (NLEB) and trees within delineated wetlands. USFWS recommends clearing after July 31 (SUN8

voluntarily proposes August 31) under Section 4-D rule for exemption to avoid harming any NLEB. Those trees within delineated wetlands will be cleared using non-mechanized means. Any remaining clearing can be performed at any time in the year, with mechanized crews, subject to clarification #1 above and appropriate SWPPP protocol. TGM requested that all these areas be shown on the Tree Clearing Plan to provide a one-stop resource for this purpose. While these affirmations have already been stated in several of the documents previously submitted, we acknowledge that per TGM's request an updated drawing sheet, which enhances the illustration, no new facts or methods presented however, will be provided.

### **Ellis Tract Projects:**

#### **3. Clearing of hedgerow to the north of proposed array N1 and east of N1, N2 & N3.**

Clearing will occur consistent with clarification #1 above.

Specifically, with reference to the proposed tree clearing area to the east of N1 - N3, we estimate that for the first third of the area vegetation taller than 10' will be removed, for the second third of the area, trees taller than 20' will be removed, and for the last third of the area, trees taller than 30' would be removed. Such clearing will occur with non-mechanized means and tree stumps will not be uprooted.

#### **4. Wildlife corridor between N3 and N4.**

Per your request, we will provide a corridor along the existing mature E-W hedgerow currently running in the middle of N3 - in lieu of corridors between N2 and N3, and N3 and N4. Clearing and trimming will be limited to trees that pose a fall hazard or a shading concern (height greater than 20'). Please see the draft layout included as Appendix A to this correspondence.

#### **5. Simulated view from Turkey Hill Road.**

Per your request a simple visual simulation model is being provided as an attachment. As stated in the Ellis Tract Visual Impact Statement, a double-row vegetative buffer proposed at approximately 100' from the centerline of Turkey Hill Road. The plantings will be chosen to expect maturity at a height of 12-14', so as not to obstruct the vista view.

The viewshed is comprised of array N5 primarily. Array N4 is located on ground that drops in elevation and is behind array N5; occupying a negligible proportion of the viewshed and indistinguishable from the vantage point on Turkey Hill Road. In order to have a clear visual of Array N4, the vantage point had to be elevated to a height of 300 feet in the 3D model. So, the visual rendering provided includes substantially all of array N5, but not array N4.

**6. Prime Soils in the Ellis Tract Area.**

A table showing the prime soil classification is provided along with this list of clarifications. In summary, the Project vicinity consists of 144 ac of prime soils and 30ac of Project area contains prime soils and overlaps with the fenced area. This information is presented on the Soils Map (part of the Site Plan) but is being excerpted into the requested form.

**2150 Dryden Road Projects:**

**7. Approved Location of the Verizon Tower.**

We acknowledge the new information received from Mr. Dave Sprout regarding the approved location of the cell phone tower – 150’ north of the first proposed location. Placement of the tower in our drawings was based on Site Plan drawings received from the tower developer. We confirm that approved location of the tower will not impact our proposed arrays. We will respect the fall zone (two times the break height, plus 10’ buffer) around this approved location and will not locate any permanent structures within the fall zone.

**8. Prime Soils in 2150 Dryden Road Parcel.**

A table showing the prime soil classification is provided along with this list of clarifications. In summary, the Project vicinity consists of 61 ac of prime soils and 35 ac of the Project area contains prime soils and overlaps with the fenced area. This information is presented on the Soils Map (part of the Site Plan) but is being excerpted into the requested form.

**9. Revised landscaping plan.**

SUN8 had proposed shorter plantings immediately north of the yellow building at the Willow Glen Cemetery that do not obstruct the vista view. This affirmation is provided in the 2150 Dryden Road – Visual Impact Statement. TGM requested that a note be added to sheet C-105 of the Site Plan or that sheet L-101 be revised. We agree that sheet C-105 is best suited to include an updated note to reference the statement from the visual impact statement submitted.

Please accept these clarifications as an addendum to our submittal. We request the opportunity to compile all these modifications to the Site Plan drawings through these written clarifications, and be allowed at the conclusion of your review to incorporate above-mentioned clarifications efficiently in one new revision.

Please let me know if you have any questions,

Bharath Srinivasan  
SUN8 PDC LLC

Appendix A – Draft Layout of N3 and N4 with new wildlife corridor (NTS)

