

T.G. MILLER, P.C.

ENGINEERS AND SURVEYORS

605 W. State Street, Suite A | Ithaca, NY 14850 | phone 607-272-6477 | fax 607-273-6322 | www.tgmillerpc.com

October 21, 2020

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

Re: Solar Photovoltaic Plants
2150 Dryden Road
Dryden-Tompkins Solar II, LLC
Revised Interconnection Review

Dear Supervisor Leifer,

We received the George Road Electrical Interconnection and Visual Impact Analysis dated July 29, 2020; a response letter dated September 17, 2020; a SWPPP Modification Report dated September 23, 2020; and a Pole Farm Site Plan, Option 1A dated October 16, 2020 all as prepared by LaBella Associates. Upon review of these documents, I offer the following comments as they pertain to the previously approved plan.

1. The SWPPP Modification Report that was provided, incorporates the additional work proposed at the point of common coupling and shall be kept onsite with the approved project SWPPP and SPDES General Permit for Stormwater Discharges from Construction Activity. I recommend the pervious access road detail per NYSDEC requirements be added to the plan set if not already incorporated with the Building Permit submission.
2. The proposed vegetation removal across Virgil Creek has increased from 20 feet in width to approximately 100 feet to accommodate three sets of overhead lines. The total wooded area to be cut on either side of the creek is approximately 0.85 acres, or an additional 0.68 acres. I recommend the vegetation removal across the creek be limited to only those trees that will immediately impair the overhead lines and that shorter understory vegetation not be cut. Any tree stumps should remain to avoid soil disturbance. In addition, future tree cutting should be limited to these same requirements. Per a conversation with NYSDEC on September 21, 2020, an Article 15 permit for disturbance of a protected stream does not appear to be required for the proposed work since the application has stated no disturbance will occur within the creek bed or bank. What is not clear from the plans is if there is a defined bank along the creek that would set clear limits for top of bank. If there is no discernable top of bank then NYSDEC regulates 50 feet from the creek channel. Based on the Pole Farm Site Plan, Option 1A, it appears the poles will be placed to meet this minimum setback. Therefore, no significant impacts on plants and animals are anticipated as a result of the proposed modification.
3. The siting of the poles within the field will reduce the total tillable acreage by approximately 0.7 acres. The system can be decommissioned and removed, allowing the land to revert back to agricultural use. The pole placement and spacing depicted in the Pole Farm Site Plan, Option 1A indicates a 40-foot wide access lane is maintained around the poles and any guy wires for agricultural equipment. Based on this latest information, no significant impacts on agricultural resources are anticipated as a result of the proposed modification.

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

Dondi M. Harner, P.E.
LEED A.P., C.P.E.S.C.

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

4. Five interconnection locations along George Road were originally shown on the SUP plans dated July 7, 2017. Although no specific site plan was provided showing the detail interconnection requirements, the approximate location was noted with the understanding that additional design was necessary for the interconnection to the NYSEG system. The total number of connections have since been reduced from 5 to 3 with only one point of connection to the NYSEG power poles along the George Road right-of-way. Prior to combining the three connections, we understand the multiple poles are required as shown on the Pole Farm Site Plan, Option 1A in order to meet NYSEG interconnection requirements. NYSEG further described these requirements in a letter dated August 3, 2020. The applicant has prepared a revised site plan outlining the detail connections and a Visual Impact Analysis. Based on the visual renderings and line of sight profiles provided, the visibility of the proposed infrastructure will be limited to nearby residences and vehicles traveling along George Road. The proposed infrastructure will be partially screened by native vegetation surrounding the site. While no significant adverse impact to aesthetic resources are anticipated as a result of the proposed modification, I do suggest the Town consider a requirement for planting of evergreen trees within the current vegetated area adjacent to George Road to supplement the seasonal visual screening of the existing deciduous trees and shrubs. If supplemental screening is deemed appropriate, a Planting Plan prepared by a qualified design professional or landscape contractor should be submitted to the Town for review and approval. The quantity, size and placement of evergreen trees would be based on sight lines that will soon become revealed by the falling leaves.

Based upon my review of the above referenced documents, together with my recommendations, it is my opinion the proposed modifications do not trigger a supplemental environmental review; therefore, the Town Board can consider re-affirming the 2017 Negative Declaration of Environmental Significance.

Feel free to contact me with any questions related to this recent review. Thank you.

Respectfully,



David A. Herrick, P.E.
Principal

Cc: R. Burger, Director of Planning