



August 15, 2024

**VIA ELECTRONIC MAIL**

Town of Dryden Planning Board  
Town of Dryden  
Dryden Town Hall  
93 E Main Street  
Dryden, NY 13053

**Re: NY Dryden III, LLC  
Commercial Solar Project  
Response to T.G. Miller, P.C. Comment Letter dated July 19, 2024**

Dear Chairman and Members of the Board:

P.W. Grosser Consulting (PWGC), as the project engineer and environmental consultant to NY Dryden III, LLC, is in receipt of the letter prepared by T.G. Miller, P.C. (hereinafter "TGM Letter") dated July 19, 2024. This letter has been prepared to respond to such comments, and modified plans and documentation are enclosed, as noted below.

**TGM Letter – Operation and Maintenance Plan**

1. *Comment addressed. Please provide the O&M Agreement to the Town once complete.*

**PWGC Response:** The applicant will provide the Operations and Maintenance Agreement to the Town once completed.

**TGM Letter – Decommissioning Plan**

2. *The cost estimate seems reasonable. Please update and provide the Town with a NYS PE stamped cost estimate once the site plan is finalized.*

**PWGC Response:** Once the site plan is finalized, a New York State Professional Engineer-stamped cost estimate will be provided to the Town.

**TGM Letter – Visual Assessment**

4. *Provide additional detail for upgrade to existing NYSEG infrastructure. Will additional poles be required outside project limits? Show full extents of NYSEG upgrade. Suggest providing an elevation view of the interconnect (PCC) location.*

**PWGC Response:** The applicant has informed NYSEG of the POI change and NYSEG has received the updated layout. This change will require reconductoring of West Malloryville infrastructure from single to three-phase line. This proposed design would require easements from the current landowner and neighboring landowner. The extent of easements will be further determined at the NYSEG design stage.



## TGM Letter – SWPPP

- The time of concentration should be calculated from the hydraulically most distant point of a watershed. The time of concentration shown on the C-603 begins is in the middle of a much larger watershed that extends up to Morris/W Malloryville Rd. Please provide a drawing of the watershed boundaries, areas, and update time of concentration flow path and calculations. Alternatively, review use of diversion swales or adjusting location of practices to treat impervious surfaces.*

**PWGC Response:** PWGC would like to discuss the time of concentration with the Town engineer. Once this is discussed, an updated Stormwater Pollution Prevention Plan (SWPPP) will be provided.

- In the site plans and HydroCAD calculations 11.04 acres of soil in the preconstruction watershed is classified as row crop, HSG D. In the post construction watershed 0 acres are classified as HSG D. Please explain how the HSG changed from pre to post construction. Additionally, if existing land use is agriculture, the curve number for the pre-developed condition must be modelled as “meadow” not row crop per Section 4.5 of the New York State Design Manual. Please adjust runoff calculations accordingly.*

**PWGC Response:** The hydrologic soil group (HSG) ratings included in the pre- and post-construction conditions (Appendix D of the SWPPP) will be revised for consistency. Additionally, cover types will be broken down into specific areas relating to their HSG ratings. Lastly, the curve number for the pre-developed condition will be modeled as meadow, rather than row crop, per Section 4.5 of the New York State Design Manual. Runoff calculations will be adjusted accordingly.

- The reduction in slopes through site grading is acceptable. Add water bar inspection and maintenance to the SWPPP.*

**PWGC Response:** Water bar inspection and maintenance has been included in Section 3.4 of the SWPPP. The revised SWPPP is enclosed.

- Please add silt fence to the phasing plan. Silt fence should be shown parallel to the contours.*

**PWGC Response:** The Phasing Plan (Sheet C-602) will be revised to include silt fence, which will be shown parallel to the contours, as needed.

- Add “Conduct a preconstruction meeting with the Town of Dryden Code Enforcement/Stormwater Management Officer” to the 2.0 Construction Sequence and Scheduling section of the SWPPP Narrative. This should be the first item on the list.*

**PWGC Response:** The Construction Sequence and Scheduling section of the SWPPP has been revised to include, “Conduct a preconstruction meeting with the Town of Dryden Code Enforcement/Stormwater Management Officer” as the first item (see enclosed).

- Please demonstrate or describe where the 1.16-acres of impervious cover is coming from or update to match plans.*

**PWGC Response:** The area of impervious is approximately 1.26 acres, which includes 1.23± acres of gravel for the proposed access road and 0.03± of impervious cover for the concrete equipment pads.

- Add impervious area to SWPPP narrative section 3.2.2.*



**PWGC Response:** Section 3.2.2 of the SWPPP has been revised to include impervious area (see enclosed).

12. *Please justify why the CN for post-development is larger than the existing*

**PWGC Response:** PWGC will address this comment once the HydroCAD calculations are complete.

13. *In the SWPPP narrative, please describe the receiving water body and identify if there are any special conditions that affect the design of the rain gardens (i.e. discharge to a trout stream).*

**PWGC Response:** The SWPPP narrative includes a description of the receiving water body. Specifically, the proposed design would include water bars and three (3) rain gardens. Stormwater runoff would flow to the rain gardens and then towards the existing unregulated wetland located in the southwest portion of the subject property, which is where stormwater runoff currently flows to. The proposed action is not anticipated to result in a change of flow to this wetland as compared to pre-construction conditions. Additionally, the location of the on-site water bodies will be updated on the site plan once the survey is completed. It is noted that the proposed design does not include a specified discharge point going into a regulated body of water.

14. *Verify whether or not the project will discharge to a 303d impaired water body. NYSDEC Stormwater Interactive Map shows a 303d stream is within the project parcel.*

**PWGC Response:** The proposed project would not discharge directly to a 303(d) impaired water body. Stormwater runoff would flow to the rain gardens and then towards the existing unregulated wetland located in the southwest portion of the subject property, which is where stormwater runoff currently flows to. The proposed action is not anticipated to result in a change of flow to this wetland as compared to pre-construction conditions. Additionally, the location of the on-site water bodies will be updated on the site plan once the survey is completed. It is noted that the proposed design does not include a specified discharge point going into the 303(d) impaired water body.

15. *How does the proposed design handle stormwater runoff that drains onto the site.*

**PWGC Response:** This comment will be discussed with the Town engineer. Once this is discussed, a response will be provided accordingly.

16. *Please provide a rain garden detail with a cross-section. Additionally, the rain gardens need to be modeled in the HydroCAD calculations.*

**PWGC Response:** PWGC is working on including the rain garden detail, which will include a cross-section and be added to the site plan. The rain gardens will also be modeled in the HydroCAD calculations.

### **TGM Letter – General Comments**

1. *Please provide the following documents*
  - c. *Notice of Ground Disturbance Form*  
*Notice of Ground Disturbance is enclosed.*



***Provided, but impervious area does not match plans or HydroCAD calculations. Please revise. It shows 0.02 acres plans show 0.05 acres.***

e. *Wetland Delineation Report*

***Provide wetland delineation report when finalized.***

f. *Glare Assessment Survey*

***Review with Town/Planning board. Consider providing condition for glare mitigation as outlined above.***

**PWGC Response:**

c. The applicant will revise the Notice of Ground Disturbance to match the Site Plan and the HydroCAD calculations. The Notice of Ground Disturbance will be provided to the Town under separate cover.

e. A final wetlands survey and report will be provided once completed.

f. This comment is noted.

2. *Is the design intent to stockpile topsoil until the solar facility is decommissioned? If so, I would suggest the topsoil be replaced after final grading is complete to provide adequate growing media. Note on plans to strip, store, and reinstall topsoil.*

**PWGC Response:** The proposed design does not include stockpiling of topsoil. However, the topsoil will be replaced after final grading is complete to provide adequate growing media. The site plan will be revised to include a note to strip, store and reinstall topsoil.

4. *Provide additional information for offsite improvements that are required for NYSEG infrastructure.*

**PWGC Response:** Additional information for offsite improvements that are required for NYSEG infrastructure will be provided by the applicant.

5. *Easement to be acquired and shown as site plan progresses. Show locations of proposed easements on the maps.*

**PWGC Response:** The site plan will include any acquired or proposed easements, as necessary.

12. *Please review the site plan with the Fire Chief for approval.*

**PWGC Response:** The applicant will coordinate with the McLean Fire Department for review and approval of the site plan by the Fire Chief.

**TGM Letter – FEAF Part 1**

5. *impervious area does not match plans or HydroCAD calculations. Please revise. It shows 0.02 acres, plans show 0.05 acres.*

**PWGC Response:** The Full Environmental Assessment Form (EAF) Part 1 has been revised to include impervious area as 0.03 acre, which is consistent with the site plan and HydroCAD calculations. The revised Full EAF Part 1 is enclosed.



Thank you.

Sincerely,  
**P.W. Grosser Consulting**

A handwritten signature in black ink, appearing to read "Usman", written over a light gray rectangular background.

Usman Chaudhry  
Sr. Project Manager

A handwritten signature in black ink, appearing to read "Michael Scanlon", written in a cursive style.

Michael Scanlon, PE  
Project Manager

Enc. (2)

1. NY Dryden III, LLC Stormwater Pollution Prevention Plan – August 2024
2. NY Dryden III, LLC Environmental Assessment Form Part 1 – August 15, 2024