



September 10, 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 – 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: A grassed waterway and five (5) 24" CMP culverts have been added north of the project area in order to divert stormwater from offsite to the existing wetlands onsite and away from the proposed rain gardens, therefore the time of concentration has remained the same to focus on the disturbed areas for pre-construction and post construction flows.

- 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) have been revised for consistency. Additionally, cover types have been broken down into specific areas relating to their HSG ratings. Lastly, the curve number for the pre-developed condition has been modeled as meadow, rather than row crop, per Section 4.5 of the New York State Design Manual. Runoff calculations have been 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.

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

PWGC Response: A note has been added to The Phasing Plan (Sheet C-602) that states “All silt fence to be installed parallel to contours during each phase.”

9. *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).

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

PWGC Response: The SWPPP has been revised to show 0.03 ac. of impervious area, which is from the transformer pads.

11. *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: The HydroCAD models have been revised and the post-development CN is now less than the existing conditions, see Appendix D of the SWPPP.

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 receiving water body has been described as a 303d impaired water body in section 3.0 of the SWPPP. According to the DECinfo Locator, the stream on site is not a trout stream.

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 with a compacted earth berm and emergency overflow 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.

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



PWGC Response: To help divert water from running onto the site, a grassed waterway and five (5) 24" CMP culverts have been added north of the project area. During construction, sediment traps are proposed for each phase of the work and post construction rain gardens area proposed and sized to infiltrate the water quality volume.

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: Cross sections for each rain garden and a rain garden detail have been provided on sheet C-201 of the Site Plans. The rain gardens have also been included in the HydroCAD calculations.

Thank you.

Sincerely,
P.W. Grosser Consulting

Usman Chaudhry
Sr. Project Manager

Michael Scanlon, PE
Project Manager

Enc. (2)

1. NY Dryden III, LLC Stormwater Pollution Prevention Plan – September 2024
2. NY Dryden III, LLC Site Plans