

Genevieve M. Trigg
Special Counsel

November 16, 2020

Town of Goshen Planning Board
Town Hall
41 Webster Ave.
Goshen, NY 10924

Re: Forefront Power LLC – Varano Solar
Proposed 5MW Solar Farm Located at 270 & 276 Maple Avenue
Revised Site Plans

Dear Chairman Bergus and Members of the Planning Board:

As you are aware, Forefront Power LLC (“Forefront”) has submitted site plan and special use permit applications to allow for the construction of a proposed 5MW large-scale solar farm development located at 270 & 276 Maple Ave in Goshen, NY (the “Project Site”).

Upon receiving a Negative Declaration from the Planning Board, the project was referred to the Town of Goshen’s Zoning Board of Appeals (“ZBA”). Over the course of a six-month period, the ZBA heard and deliberated the requested area variances related to setbacks and above-ground cable wiring. The ZBA approved all requested variances at its October 6, 2020 meeting.

Forefront submitted revised plans to the Planning Board on or around September 30, 2020 to reflect changes based on comments from Orange & Rockland Utility (“O&R”), as well as comments from the Orange County Department of Public Works (“OCDPW”). The plans were further revised on November 16, 2020 and are enclosed herewith. Revisions to the plans include the following:

- 1) Relocating the point of interconnection.

The original interconnection point was located at the intersection of Maple Avenue and the private drive known as Bonfut Lane. However, O&R required the interconnection to be relocated to an area behind the first group of solar arrays. This is an improvement to the project as the interconnection poles will be less visible from Maple Avenue. Existing O&R poles will be utilized, as determined by O&R. In accordance with a former determination by the Town of Goshen Building Inspector, “the connection to the public utility grid, consisting of utility poles, as determined necessary by Orange and Rockland Utilities, Inc. ..., is not required to be located underground.” In accordance with Town Code § 97-55(F)(10), all other power lines from the solar energy system to the onsite interconnection equipment, will be located underground with the exception of the above-ground cables for which the ZBA granted a variance.

2) New access drive.

The existing private drive located along the eastern property boundary was proposed as the original access to the Project Site. However, this was deemed unacceptable by OCDPW. At the direction of OCDPW, a new driveway access is proposed for the project, located approximately 320 feet east of the existing drive. Forefront will utilize this drive mainly during construction and it will be decommissioned at the end of the project. As demonstrated on the revised plans, there is adequate site distance from the access drive onto Maple Avenue. (See Sheet C-902). In addition, a construction entrance sign will be installed prior to the start of construction and will remain in place for the duration of the project. The access drive will be gravel-based and the minor additional grading will be addressed under the project Stormwater Pollution and Prevention Plan.

The above-referenced changes are minor in nature and will not result in any significant adverse environmental impacts under SEQR. We respectfully request this supplemental submission be reviewed by the Planning Board at the December 3, 2020 meeting to present the project. In the meantime, should you have any questions or require any additional information concerning this project, please feel free to contact me.

Thank you for your consideration.

Very truly yours,

/s./ Genevieve M. Trigg

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Encl.