

Nexamp Alturus Landfill Solar Array

LaBella Associates, D.P.C. (LaBella) Response to Hoffman Engineering Comments

Comments Provided: February 10, 2023

Response to Comments: March 10, 2023

*Responses to Comments:*

**1. Zoning:**

- a. No response required.
- b. *Response:*
  - The plans have been revised, dated 3/10/2023, to include a detail for the TruGrid reinforcing system on C-501.
  - The project Team has contacted Town emergency services and Building Inspector Leva to discuss the radii and angles of approach for emergency vehicle access to the Site. Potential installation of two (2) turnarounds where road dead ends are shown will be evaluated.
- c. No response required.
- d. The plans have been revised, dated 3/10/2023, to include the Stream Corridor & Reservoir Watershed Overlay (SC) district on the permit drawings.
- e. The plans have been revised, dated 3/10/2023, to include the Floodplain & Ponding Area Overlay (FP) district on the permit drawings
  - The proposed fencing is outside the limits of the FEMA Zone AE floodplain
- f. *Dimensional Regulations:*
  - *General:* Nexamp is seeking setback variances for adjoining project parcels.
  - *Lot Size:* Approved as of 2/21/2023
  - *Road Frontage:* Approved as of 2/21/2023
  - *Setbacks:* Approved as of 2/21/2023
  - *Fencing:* Approved as of 2/21/2023
- g. *Supplementary Regulations:*
  1. *T&E Species and Sensitive Environmental Receptors Map:*
    - A figure has been provided, identifying any wetlands, floodplains, stream corridors, wetland transition areas, habitats for endangered, rare, or threatened species, historic and/or culturally significant areas, conservation easements or conservation deed restricted areas.
  2. *PV System Tree Clearing:*
    - Tree clearing to be performed is being done to accommodate placement of utility poles to interconnection point.
    - Confirmed that none of the parcels included in the application contain conservation easements or deed restrictions impacting the solar energy system.
    - *Seed Mix:* The seed mix used for any restoration required as part of the solar project will be consistent with the existing vegetative cover on the landfill.

3. *Equipment Pad Details:*
  - IFC drawings will show equipment orientation.
4. *Permanent Signage:* No response required.
5. *Voltage Signage:* A detail showing proposed equipment pad layout including warning signage will be included as part of the IFC package.
6. *Glare Abatement:*
  - The panels will have an industry-standard anti-reflective coating applied. The SGHAT Glare Analysis factors in the anti-reflective coating.
  - *Glint-Glare Receptors Map:* Latitude, Longitude, aerial location image, ground elevation, and vertices for each receptor location can be found in Appendix A as part of the SGHAT Glare Analysis Report.
  - *Glint-Glare Flight Paths:* The FAA does not provide helicopter flight paths for the Town of Goshen. Flight paths are required to assess glare at helipads that are not in the immediate vicinity of the project area.
  - *Glint-Glare Observation Heights:* The 15.50 feet height on Observation Points 12, 17, and 25 accounts for an average person height of 5.5 feet, at a second story window on a standard building. The 25.50 feet height on Observation Point 25 accounts for an average person height of 5.5 feet, at a third story window on a standard building. The 10-foot heights for Routes 1, 3, 5, and 7, account for the approximate eye level of a person in a box or semi-truck. The 4-foot height accounts for the approximate eye level of a person in a passenger vehicle
  - *Glint-Glare Tree Removal:* The glint-glare analysis has been re-run to account for potential tree removal conditions. The full glint-glare analysis has been provided as part of this response package.
7. *Lighting:* No lighting is proposed
8. Refer to comment response in 1b.
  - Refer to comment response in 1b.
  - Confirmed that two (2) hatchings show existing and proposed areas. The drawing legend on C-001 has been revised, dated 3/10/2023.
  - The crowned detail applies only to the proposed gravel turnaround constructed on the landfill. The existing road to be improved is intended to match existing grades and drainage conditions.
  - Compacted subgrades will apply to areas with gravel base. The note on C-001 has been revised, dated 3/10/2023.
9. No response required.
10. *Underground and Aboveground Power Lines:*
  - IFC Drawings for issuance of Building Permit will include details and exact locations of cable trays, wire harnesses, trenches, and above ground wire routings.
  - Note 1 has been revised on C-201 to reference the waiver received from the Town of Goshen.
11. No response required.
12. *Landscaped Vegetative Screening:*
  - A vegetative screening plan has been developed for this area to help supplement existing vegetation and provide screening for the array from Route 17M that is located within the lease area parcels.
  - The proposed fencing detail has be revised to include additional dimensions on overall height and ballast size. Additional details for securing the proposed fence to the existing fence will be developed as part of the Construction Documents.
13. *Non-Function and Construction Completion Clause:* Noted.

14. *Operation Manual*: Noted. This manual will be provided to the Building Department and Fire Department upon project completion.
15. *Wind and Snow Loads*: These loading parameters were taken into account as part of the ballast system design. This information will be submitted as part of the Construction Documents for Building Permit Issuance.
16. *Scenic Road Corridor Overlay District*: Noted.
17. *Decommissioning Plan*: The decommissioning plan was previously submitted to the Town Board – revisions and approval of the Decommissioning Plan will be coordinated directly with the Town Board.
18. *Utility Interconnection Agreement*: Redacted CESIR study was submitted in original submission in July 2022. Additional utility interconnection agreement information will be provided.

## 2. Site Plan:

- a. *Access, Parking, and Staging*:
  - The laydown area will be stoned. No clearing is required for the laydown area; as discussed above in Response 1.g.2, tree clearing shown is to accommodate utility poles for interconnection.
- b. *Utilities*: No response required.
- c. *Stormwater*:
  - LaBella has reached out to the NYSDEC Division of Water for clarification as to whether these two projects (cover repairs and solar array installation) are considered to be separate. The cover repair project plans received approval from NYSDEC prior to Nexamp identifying the Site as a potential solar array project.
  - *Drainage Modification*: Site grades and accessways have been designed to have the most minimal effect possible on existing collection and conveyance systems. Existing collection and conveyance systems do not require modifications based on the current design.
  - *Soil Stockpile*: Minimal soil is expected to be stockpiled as part of this project. However, in the event that soil stockpiling is required, a soil stockpile detail has been provided to account for this.
- d. *Miscellaneous*:
  - *Access Drive*: See response to comment above in Section 1.g.8, “Turnarounds.”
  - *Access Gate*: A Knox box has been added to the access gate detail on Sheet No. C-502.
  - *Right-of-Way*: Copies of the deed report will be provided as part of this full response to comments package.
  - *Operations & Maintenance*: Operation and maintenance responsibilities and delineation will be provided to the Building Department in the form of the PCMM Plan. This plan is currently being reviewed by NYSDEC and will be provided upon completion of this review and approval by NYSDEC.
  - *Snow Removal*: Snow removal will be modified from plowing following an event of 10” or more to plowing following a snow event of 4” or more over a 24-hour period.

## 3. SEQRA: Confirmed.