



**June 12, 2020**

**Mr. Frank Alessandrini**  
Planning Board Chairman

Town of Schaghticoke  
Planning Board  
RD#1, Box 19B  
Northline Drive  
Melrose, NY 12121-9707

Regarding: Herrington Solar Farm Project  
33 Bracken Road

**Dear Mr. Alessandrini:**

The Environmental Design Partnership, LLP. (EDP) is in receipt of review comments provided by Mr. Jason Dell of Lansing Engineering, PC, dated June 10, 2020. On behalf of the Applicant, Herrington Solar, LLC, we offer the following comments, revised plan set and additional information (Mr. Dell's original comments are provided along with EDP's response in bold where applicable).

1. Section D.2.e of Part 1 of the EAF shall be checked yes as the project area disturbs more than 1 acre.  
**Question D.2.e of the EAF Part 1 has been check yes.**
2. The applicant shall submit a signed EAF for consideration.  
**The enclosed EAF Part 1 has been signed by the Applicant.**
3. The Planning Board should review the revised Visual Impact Assessment including the removal of proposed screening along Bracken Road prior to finalizing a SEQRA determination.  
**No response required.**
4. The sediment control fencing should be revised to run parallel to the contour intervals and not continue across contour lines.  
**The sediment control fencing has been revised as requested.**
5. The detail for the stone level spreader shown on the Site Details Sheet does not conform to the level spreader detail outlined in the NYSDEC Standards and Specifications for Erosion and Sediment Control (Blue Book). Applicant to revise detail per NYSDEC Standards.  
**EDP has reviewed the use of alternative level spreader designs with the Mr. David Gasper of the NYSDEC who has confirmed the acceptability of alternative designs as proposed by the design engineer.**
6. The applicant shall verify the locations and feasibility of the level spreaders as it appears some existing slopes exceed the 10% threshold outlined by guidance provided by Maryland Department of the Environment (MDE) and adopted by the NYDEC. As stated by the MDE, "Installations on slopes greater than 10% will require and engineered plan that ensures adequate treatment and the safe and non-erosive conveyance of runoff to the property line or downstream stormwater management practice."  
**EDP has reviewed the April 5, 2018 NYSDEC Solar Panel Construction Stormwater Permitting/SWPPP Guidance and Maryland Department of the Environment guidance with the NYSDEC relative to solar panel applications on slopes exceeding 10%. The NYSDEC has confirmed that the use of level spreaders at a maximum horizontal spacing of 100 feet, as proposed, is an appropriate means to maintain sheet flow in these applications.**

7. The applicant shall provide appropriate locations for material/soil stockpiles. A detail should also be added to the plans outlining the proper sediment and erosion control measures relating to the material/soil stockpiles.  
**Locations relative to soil stockpiles have been shown on the plans and silt fence has been proposed around the stockpiles to provide sediment and erosion control. Material staging will take place in the 1-acre temporary staging area shown on the plans on the southern border of the solar field adjacent to the access road, this area will also be protected by silt fence on the downgradient side.**
8. In response to comment 11 of Lansing's March 04, 2020 letter the applicant states, "There is an existing culvert at this swale. No modifications are proposed to this culvert." The applicant shall verify the condition of this existing culvert to ensure the proposed access road can be installed and used with the necessary vehicle loadings without compromising the existing culvert.  
**The existing culvert has been determined to be in good working order. A note has been added to the plans requiring the existing culvert to be plated during construction to protect it from excessive construction loading.**
9. It appears the SHPO sign-off and Environmental Mapper information is missing from Section 6 of the SWPPP.  
**The requested information has been added to the SWPPP.**
10. The SWPPP should also include documentation pursuant to Part 1.F.4 of GP 0-20-001 with respect to federal threatened and endangered species. Provide any documentation received from agencies having jurisdiction, or database searches to support permit eligibility. This includes the USFWS Ipac.  
**The requested documentation has been added to the SWPPP.**
11. The title on the post-development map appears to indicate it is the existing conditions map. Applicant to revise.  
**The post-development map has been updated.**
12. The applicant should label all stormwater management features including the two Stormwater Management Basins on the post-development stormwater map.  
**The stormwater management features have been more clearly labeled on the post-development stormwater map.**
13. Provide Test pit locations and information on the pre and post development stormwater maps.  
**The test pit information has been added to the post development stormwater maps.**
14. It is not clear where rainfall data has been acquired from. This information shall be outlined in the Stormwater Narrative.  
**The rainfall data was acquired from the "Extreme Precipitation in New York & New England" which is a joint collaboration between Cornell University, Northeast Regional Climate Center, and Natural Resources Conservation Service for the project site location. The Stormwater Narrative has been updated to indicate the source of the rainfall data as well.**
15. The applicant shall provide an Operation and Maintenance Manual in the SWPPP for all stormwater management features as required by Section 3.5 of the New York State Stormwater Design Manual.  
**The Operation and Maintenance information has been added to the SWPPP.**
16. Section 5.1 of the Stormwater Narrative and included HydroCAD modeling indicates that SMA#1 has been designed as a P-5 Pocket Pond and includes a proposed outlet structure. However, the plans appear to show an infiltration basin with no outlet structure or permanent pool. The applicant shall

revise accordingly.

**The Stormwater Narrative has been updated to reflect the use of an infiltration basin at this location.**

17. The Stormwater modeling provided in the Stormwater Narrative indicates SMA#1 has a top of basin elevation of 400'. However, the plans indicate a top of basin elevation of 380'. Please clarify.  
**The Stormwater Narrative and Plans have been updated to reflect a consistent top of basin elevation of 380'.**
18. Calculations should be provided to verify the proposed vegetated swales provide the required pre-treatment volume prior to entering the Stormwater Management Basins. This volume shall be based on the existing infiltration rates as stated in the New York State Stormwater Design Manual. Permanent check dams may be needed to achieve the required volume.  
**The requested calculations and pretreatment descriptions have been provided in the stormwater narrative section for each respective stormwater management area.**
19. Cross sections of both Stormwater Management Basins shall be provided and should include peak water elevations of the storms analyzed as well as elevations of the design features of the basins including the top of basin, bottom of basin, and any outlets/emergency overflows that have been proposed.  
**Cross sections have been provided as requested.**
20. Stormwater Management Basin 1 does not appear to include an emergency overflow as required by the New York State Stormwater Design Manual.  
**An emergency overflow weir has been added to SMA#1.**
21. The applicant shall revise the Runoff Reduction Volume (RRv) calculations as the proposed swales have been identified to provide pretreatment to the Stormwater Management Basins and therefore cannot be counted as a runoff reduction. In addition, the runoff reduction appears to be counted twice as the downstream practice of an infiltration basin has also been calculated as a reduction for the same contributing area as the swales.  
**The Runoff Reduction Volume calculations have been updated as requested.**
22. Include an MS4 acceptance form in section 3 of the SWPPP.  
**An MS4 acceptance form has been included in Section 3 of the SWPPP.**
23. Revise the SWPPP to include information regarding if or how soil restoration will be achieved in accordance with Section 5.1.6 of the New York State Stormwater Design Manual. It may be necessary to revise the stormwater modeling and Water Quality Volume calculations to comply with that New York State Stormwater Design manual if no soil restoration is being proposed.  
**The SWPPP has been updated to include information regarding soil restoration under the Long Term Operation and Maintenance Procedures. Soils restoration requirements are also included on the Erosion and Sediment Control Plan.**
24. A signed owner/operator certification form will need to be signed prior to filing the Notice of Intent (NOI).  
**Comment noted.**

**Mr. Frank Allesandrini**

June 12, 2020

**ENVIRONMENTAL DESIGN PARTNERSHIP, LLP.**

Shaping the physical environment

---

We have enclosed (and forwarded electronic copies to the Lansing Engineering) the following information for distribution as necessary in support of this application.

- 2 full size and 8 reductions of the Revised Site Plans
- 2 copies of a Stormwater Management Report
- 2 copies of SWPPP
- 8 copies of Updated Full EAF
- A PDF Version of the plans and applications was email under separate cover

Please do not hesitate to contact our office if you have any questions or require additional information.

Sincerely,



Travis J. Mitchell, P.E.  
Environmental Design Partnership

cc: Giovanni Maruca (via email)  
Jason Dell (via email)