

June 10, 2020

Mr. Frank Alessandrini, Chairman
Town of Schaghticoke Planning Board
290 Northline Drive
Melrose, NY 12121

**Re: Herrington Solar Farm Special Use Permit and Site Plan Review
LE Project No. – 79302**

Dear Mr. Alessandrini:

Lansing Engineering (LE) has reviewed the Preliminary Submission Package for the above referenced project prepared by Environmental Design Partnership, LLP; which included the following information:

- Preliminary Submission Package dated February 14, 2020
 - Site Plans dated March 31, 2020
 - Comment Response Letter dated May 14, 2020
 - Stormwater Management Narrative dated March, 2020
 - Stormwater Pollution Prevention Plan (SWPPP) dated March, 2020
 - Full Environmental Assessment Form Part I (FEAF)
- Visual Impact Assessment (VIA) Report dated October 23, 2019 and revised on April 15, 2020
 - Report Text
 - Report Figures

Our review assumes the plans and reports submitted for consideration are an accurate and true depiction of the existing and proposed conditions of the project and project site. This review does not absolve the Applicant and their Agent of their responsibility for the accuracy and completeness of the information shown on the submitted maps, plans, and reports.

Based upon our review of the above information, we offer the following comments:

State Environmental Quality Review

1. Section D.2.e of Part 1 of the EAF shall be checked yes as the project area disturbs more than 1 acre.
2. The applicant shall submit a signed EAF for consideration.
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.

General Comments

4. The sediment control fencing should be revised to run parallel to the contour intervals and not continue across contour lines.
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.

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."
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.
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.

Stormwater Narrative/ SWPPP Comments

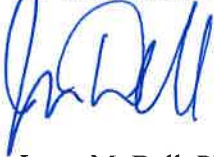
9. It appears the SHPO sign-off and Environmental Mapper information is missing from Section 6 of the SWPPP.
10. The SWPPP should also include documentation pursuant to Part 1.F.4 of GP 0-20-001 with respect to federal threatened and endangered species. Provide any documentation received from agencies having jurisdiction, or database searches to support permit eligibility. This includes the USFWS Ipac.
11. The title on the post-development map appears to indicate it is the existing conditions map. Applicant to revise.
12. The applicant should label all stormwater management features including the two Stormwater Management Basins on the post-development stormwater map.
13. Provide Test pit locations and information on the pre and 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.
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.
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.
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.
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.

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.
20. Stormwater Management Basin 1 does not appear to include an emergency overflow as required by the New York State Stormwater Design Manual.
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.
22. Include an MS4 acceptance form 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.
24. A signed owner/operator certification form will need to be signed prior to filing the Notice of Intent (NOI).

Should you have any questions or require anything further, please do not hesitate to contact me at (518) 899-5243 x 102 or jmd@lansingengineering.com.

Sincerely,

LANSING ENGINEERING, PC



Jason M. Dell, PE, CPESC, CPSWQ
Principal Engineer

ecc: Peter G. Barber
Travis Michell, PE