



Albany Office

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November 18, 2021

Dale Warner, Town Planner
Town of Duaneburg
5853 Western Turnpike
Duaneburg, NY 12056

**Re: Oak Hill 1 and 2 Solar Project Review
Our Project No. 18510-01**

Dear Mr. Warner:

On October 20, 2021, PRIME AE received Comment Response Letter 3 from AMP, Post Meeting Cover Letter, United States Army Corps of Engineers (USACE) Permit Correspondence, Pervious Access Road Assessment, CohnReznick Property Value Impact Study, and An Exploration of Property-Value Impacts Near Utility-Scale Solar Installations. Based on a review of the documents we provide the following comments (comment numbers have been kept the same as previous letters for clarity):

IFC Site Plan Drawings

11. Sheet S1.01 has been revised to remove geotextile from infiltration trenches.

Site Plan C2 – all prior comments have been satisfactorily addressed.

Grading Plan C3 – all prior comments have been satisfactorily addressed.

IFC Landscape & Planting Plan – all prior comments have been satisfactorily addressed.

IFC Mechanical Drawings 1 & 2 – all prior comments have been satisfactorily addressed.

IFC Electrical Drawings 1&2 – all prior comments have been satisfactorily addressed.

SWPPP

14. The applicant has submitted Figure 1: “EAF VS SWPPP AREA – PREDEVELOPMENT” and Figure 2: “EAF VS SWPPP AREA – POSTDEVELOPMENT” which shows how the SWPPP and EAF landcover types were determined by color-coding and shows how the two analyses (EAF vs SWPPP differ). We find these figures clearly define the areas of contribution.
21. We find the applicant’s response to meeting runoff reduction requirements and the use of infiltration basins to be acceptable, as long as the results of the test pit & perc tests to be performed support the design. If the data does not support the design, revised stormwater plans will need to be submitted for review.



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27. The SWPPP, FEAF, and the submitted figures show the removal of 0.30 acres of forested area. All items now agree.

SPDES General Permit Owner Operator Certification, Contractor Certification, and SWPPP Preparer Certification

1. If the SWPPP is revised, each certification shall be re-signed.

NOI for Coverage under Stormwater General Permit for Construction Activity – all prior comments have been satisfactorily addressed.

USACE Permit Package

1. USACE has made the determination that revised impacts are under the authorization of the originally issued permit.

NYSDOT Application and Minor Commercial Driveway Plans – all prior comments have been satisfactorily addressed.

Agricultural Data Statement – all prior comments have been satisfactorily addressed.

Full EAF Part 1

7. The applicant has submitted Figure 1: “EAF VS SWPPP AREA – PREDEVELOPMENT” and Figure 2: “EAF VS SWPPP AREA – POSTDEVELOPMENT” which shows how the SWPPP and EAF landcover types were determined by color-coding and shows how the two analyses (EAF vs SWPPP differ). We find these figures clearly define the areas of contribution.

9. We acknowledge that Section D.2.q. has been revised to note the use of herbicides for spot treatments.

Full EAF Part 2 – all prior comments have been satisfactorily addressed.

Full EAF Part 3 – all prior comments have been satisfactorily addressed.

Decommissioning Plan Summary of Changes Letter – all prior comments have been satisfactorily addressed.

Revised Decommissioning Statement – We have been asked by the town planning board to further scrutinize the submitted decommissioning statement. Through our evaluation, we determined that Amp doubled the value of the *BESS Specific Breakdown of Decommissioning Costs* for each project site. This offers an additional level of buffer to the cost associated with decommissioning.



We cross-examined the *Breakdown of Decommissioning Costs* with NYSEDA's Sample list of decommissioning tasks and estimated costs. When comparing this sample with Amp's *Breakdown of Decommissioning Costs* per MW, we found Amp's assessment to exceed the provided sample. We also compared Amp's cost assessment for decommissioning against a similar sized facility in this region for an equal footing for labor and equipment unit costs. Amp's total decommissioning cost for each project exceeded the comparable project costs. Finally, we compared their cost estimate, per MW, to other area projects and found that Amp's assessment slightly exceeds the average per-MW costs associated with those projects. Therefore, it appears that the decommissioning cost that Amp has provided is sufficient. It should be remembered that the decommissioning cost estimate will need to be revisited every 5 years for potential cost increases and the security amount updated as necessary.

Glare Analysis and Module Specifications – all prior comments have been satisfactorily addressed.

Battery Storage Specification and Photos – all prior comments have been satisfactorily addressed.

Pervious Access Road Questions Received by the Town from Concerned Citizen

Pervious access road questions received by the town from concerned citizen on 7/27/2021 and provided for our review. Answers provided by AMP on 8/6/2021.

1. & 2. The applicant submitted a certified letter by NYS licensed PE stating the design is in compliance with AASHTO guidelines to support occasional use by local fire equipment. We find this certification satisfactory.

52'x8' Enclosure Drawings – all prior comments have been satisfactorily addressed.

Powin Fire Alarm SOP

1. Powin fire alarm SOP will be provided to ESRG for review.

Permit VS IFC Comparison Plan – all prior comments have been satisfactorily addressed.

Powin 53' Enclosure Stack Drawings – all prior comments have been satisfactorily addressed.

UL 9540A Test Date Letter – all prior comments have been satisfactorily addressed.

Amp Storage System Risk Mitigation Strategy – all prior comments have been satisfactorily addressed.

Fire and Off-Gas Emergency Procedure – all prior comments have been satisfactorily addressed.

Powin's Approach to Safety Product Guide, Powin Stack230P Product Manual, Fire Suppression Cut Sheet, & Powin Stack Technical Specifications – all prior comments have been satisfactorily addressed.



Supplemental Visual Impact Assessment – all prior comments have been satisfactorily addressed.

Schletter Tracking System Assembly and Installation

1. Manufacturer has verified that the site is within the slope tolerance of the racking system standards.
If you have any questions, please feel free to contact me.

Sincerely,

KB Group of NY, Inc. dba PRIME AE Group of NY



Douglas P. Cole, PE
Senior Director of Engineering

cc: Roger Tidball, Supervisor

