



Also Doing Business As (DBA):



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*Architect*

September 21, 2017

Ms. Marisa Scavo  
Cypress Creek Renewables  
3250 Ocean Park Boulevard  
Santa Monica, CA 90405

RE: Rosemond Solar, LLC  
191 Rosemond Road  
Woodridge, New York 12789  
SBL No. 30.-1-9.4

Dear Ms. Scavo:

We have reviewed the drawings entitled "Rosemond Solar, LLC" with the latest revision date of June 8, 2017, the SWPPP dated February 15, 2017 and the Emergency Action Plan dated October 26, 2016, and offer the following comments.

Our number of the comments reflects our November 28, 2016 and January 3, 2017 letters.

#### Planning

8. Applicant must provide formal training to Mountindale Fire Department on appropriate emergency response to photovoltaic (PV) system fire as it specifically relates to Rosemond Solar as well as PB systems in general.
11. Please, provide a letter of credit for Cypress Creek Renewables.
18. The lease boundary must be written into the lease agreement. Please provide a revised lease agreement prior to final completion of the project.

#### General

1. A survey stamped by a licensed surveyor must be a part of the plan set.
2. Prior to construction, please confirm benchmarks and transfer benchmarks into and through work zone.
3. Provide a Stamped Set of Structural Drawings (During Building Permit Submission).
4. Provide written authorization by NYSEG for any construction within their easement (During Building Permit Submission).
5. Coordinate proof rolling with both the Town and Keystone prior to the placement of the subbase.
6. Record drawings stamped by a licensed engineer in New York State will be required upon completion of construction and prior to activation of the system.
7. Please revise Note No.'s 2 and 3 indicating no revisions to the approved plans will be made during construction without Town approval.

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#### Grading and Stormwater Plan (C4)

1. Provide computations for the size of the culvert which will be required under the construction entrance.
2. Please provide length, slope, size and inverts of all pipes on the plan.
3. Please label the size of each stone outlet protection and level spreader. Also, the size of the stone must be identified either on the plan or correlated with a table associated with the "Rock Outlet Protection Detail".

#### Stormwater Details (C7)

1. Please provide a width of the "French Drain Detail".
2. Please specify the Filler Cloth Wrap.
3. Replace "Wappinger" with Fallsburg in the "Stormwater Pipe In Trench Detail".
4. Although the peak elevation remains below the minimum berm elevation provided on the ASD Outlet Control Detail, a minimum one (1) foot freeboard is recommended.

#### Erosion & Sediment Control Details (C8)

1. The following details appear on C7 and should be removed from C8: Grass Lined Diversion Swale/Dike, Rock Outlet Protection Detail and Stormwater Pipe In Trench Detail."
2. We recommend providing appropriate sizing of sediment traps at 3,600 cubic feet per acre of drainage area.
3. Several of the Rip Rap Outlet Sediment Trap Detail specifications appear incomplete with text errors. Please review and revise.

#### Site Details (C9)

1. You indicate compacted 6" ABC stone base on the gravel road cross section. Please provide a gradation for the material. The section also indicates two (2), 5 ft. shoulders making the surface of the road 30 ft. Please revise the contours to reflect this or revise the detail.

#### SWPPP Report

It appears that nearly all of the original SWPPP/NOI comments were either addressed or are no longer applicable. As such, the following comments are applicable to the most recent SWPPP, revised February 15, 2017.

1. Clarification should be made to Section 1.2 stating that greater than five (5) acres will not be disturbed at any given time. Currently reference is made to greater than five (5) acres "likely" being disturbed.
2. Section 3.0 indicates submittal of MS4 Acceptance Form. Note this is not required as the Town is not considered an MS4.
3. Section 6.1.2 describes three (3) design points. This should be revised to state only two (2) design points.

4. The 15 foot minimum clearance Native Compacted Soils Perimeter Access Road in sub catchments 2A, 2B, 3A, 3B and 3C was modeled as a post “meadow” condition.
5. Infiltration rates were assumed to be 0.5 inches per hour for each of the bioretention areas. As the soils are “D” type soils, please provide infiltration testing data per the Design Manual at each proposed bioretention area, otherwise model them without infiltration and revise the SWPPP as applicable. The infiltration testing may be completed after the site is cleared. The SWPPP must be amended if the infiltration rate does not meet 0.5 inches per hour.
6. A review of Appendix F calculations indicates that a Hydrologic Soil Group Specific Reduction Factor was utilized to meet the minimum RRv treatment. The remaining WQv was treated by oversizing the bioretention areas (since bioretention areas in C and D type soils only contribute to 40% RRv/WQv treatment). However, since 100% RRv was not treated via green infrastructure practices, an “evaluation” of how all available green infrastructure practices was considered and why they were not considered applicable to the site should be provided.
7. Section 6.9 states that 100% RRv is met for all developed sub catchments. It appears this statement should read that via use of a hydrologic soil group specific reduction factor, the minimum RRv and remaining Total WQv is met for all developed sub catchments.
8. Throughout Appendix F, RRv/WQv calculations use an incorrect P-value of 1.10 inches. In accordance with the Design Manual’s Figure 4.1, the Town of Fallsburg P-value ranges from 1.3 to 1.35 inches. Please revise these calculations and SWPPP, as applicable.
9. Please consider use of the NYSDEC Runoff Reduction Worksheets in order to standardize submittals, as review of internal calculation worksheets with hidden excel formulas cannot easily be verified which lengthens the SWPPP review process. The Worksheets can be found online at <http://www.dec.ny.gov/chemical/8694.html>. These worksheets have been designed with locked formula cells to incorporate restrictions identified within the Design Manual.
10. Verify the Appendix F calculations match the unnamed data tables located within Section 6.8 and Section 6.9 as well as the Notice of Intent. In the future, please consider naming all SWPPP report tables to promote accurate reference. It appears there are discrepancies between the Total WQv listed in the tables and associated calculations. Please review and revise as necessary.

#### Notice of Intent

As mentioned above, it appears that nearly all of the original NOI comments were either addressed or are no longer applicable. As such, the following comments are applicable to the NOI.

1. Please complete missing information on Page No. 1.
2. Question 8. Consider revising the end date.
3. As noted in the SWPPP Section 6.4 table and Appendix E calculations, it appears the Qf post value should be 172.18. This does not affect the SWPPP but should be updated for clarification purposes.

4. Question 42 should be marked as “no” since the Town is not an MS4.

Erosion & Sediment Control Plan (Sheet No. C6)

1. E&SC Note No.'s 9 and 13 should replace “City” with “Town”.

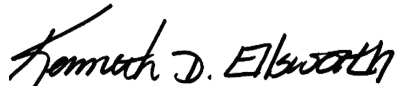
SWPPP General

1. Please consider describing how deed restriction(s) must be filed for applicable Post Construction Stormwater Management Practices.
2. In the future, please reference all Stormwater Management Plans, Details and Specifications within the SWPPP report.
3. In the future, please provide a USGS Map, Location Map, Aerial Photograph, Wetland Map, Soil Map, FEMA FIRM Map and Stream Classification Map (if applicable), showing the site boundary.

If you have any questions, please do not hesitate to contact our office.

Very truly yours,

Keystone Associates  
Architects, Engineers and Surveyors, LLC



Kenneth D. Ellsworth, P.E.  
Managing Member

KDE:las

cc: Will Illing  
Mollie Messenger  
Paula Kay, Esq.  
Paige Bakken  
Kyle Ellsworth  
Mari Giurastante