

Project :

Date :

Full Environmental Assessment Form
Part 3 - Evaluation of the Magnitude and Importance of Project Impacts
and
Determination of Significance

Part 3 provides the reasons in support of the determination of significance. The lead agency must complete Part 3 for every question in Part 2 where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.

Based on the analysis in Part 3, the lead agency must decide whether to require an environmental impact statement to further assess the proposed action or whether available information is sufficient for the lead agency to conclude that the proposed action will not have a significant adverse environmental impact. By completing the certification on the next page, the lead agency can complete its determination of significance.

Reasons Supporting This Determination:

To complete this section:

- Identify the impact based on the Part 2 responses and describe its magnitude. Magnitude considers factors such as severity, size or extent of an impact.
- Assess the importance of the impact. Importance relates to the geographic scope, duration, probability of the impact occurring, number of people affected by the impact and any additional environmental consequences if the impact were to occur.
- The assessment should take into consideration any design element or project changes.
- Repeat this process for each Part 2 question where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.
- Provide the reason(s) why the impact may, or will not, result in a significant adverse environmental impact
- For Conditional Negative Declarations identify the specific condition(s) imposed that will modify the proposed action so that no significant adverse environmental impacts will result.
- Attach additional sheets, as needed.

See Attached EAF Part 3 Narrative

Determination of Significance - Type 1 and Unlisted Actions

SEQR Status: ☒ Type 1 ☐ Unlisted

Identify portions of EAF completed for this Project: ☒ Part 1 ☒ Part 2 ☒ Part 3

Upon review of the information recorded on this EAF, as noted, plus this additional support information
Site Plan Application materials and amended and supplemental information provided by the Applicant, Delaware River Solar (or consultant Bergmann Associates), on July 1, September 7, October 12, November 13, December 6, and December 27, as well as in associated phone conversations.

and considering both the magnitude and importance of each identified potential impact, it is the conclusion of the
Town of Alfred Town Board _____ as lead agency that:

☒ A. This project will result in no significant adverse impacts on the environment, and, therefore, an environmental impact statement need not be prepared. Accordingly, this negative declaration is issued.

☐ B. Although this project could have a significant adverse impact on the environment, that impact will be avoided or substantially mitigated because of the following conditions which will be required by the lead agency:

There will, therefore, be no significant adverse impacts from the project as conditioned, and, therefore, this conditioned negative declaration is issued. A conditioned negative declaration may be used only for UNLISTED actions (see 6 NYCRR 617.7(d)).

☐ C. This Project may result in one or more significant adverse impacts on the environment, and an environmental impact statement must be prepared to further assess the impact(s) and possible mitigation and to explore alternatives to avoid or reduce those impacts. Accordingly, this positive declaration is issued.

Name of Action: Jericho Hill Road Solar Farm

Name of Lead Agency: Town of Alfred Town Board

Name of Responsible Officer in Lead Agency: Dan Acton

Title of Responsible Officer: Town Supervisor

Signature of Responsible Officer in Lead Agency:

Date:

Signature of Preparer (if different from Responsible Officer)

Date:

For Further Information:

Contact Person:

Address:

Telephone Number:

E-mail:

For Type 1 Actions and Conditioned Negative Declarations, a copy of this Notice is sent to:

Chief Executive Officer of the political subdivision in which the action will be principally located (e.g., Town / City / Village of)

Other involved agencies (if any)

Applicant (if any)

Environmental Notice Bulletin: <http://www.dec.ny.gov/enb/enb.html>

FEAF PART 3

NARRATIVE

Part 3: Evaluation of the Magnitude and Importance of Project Impacts and Determination of Significance

NY Alfred I, LLC – 5568 Jericho Hill Road Solar Farm Project, Town of Alfred, New York

The action proposed by NY Alfred I, LLC (Applicant) involves the construction of an approximate 5-MW AC solar energy system on a parcel of land located at 5568 Jericho Hill Road (parcel tax id. 164.-1-8.1). The parcel is currently utilized for agricultural purposes and contains wooded area. The Town of Alfred Town Board, as the designated Lead Agency under SEQR, has considered the impacts of short-term construction activities, as well as the long-term operation of the solar energy system, including decommissioning plans, in preparing its determination of significance for the proposed action.

The Town Board has carefully reviewed the information and answers given in the Part 1 EAF, the application materials, and supplemental applications materials provided by the Applicant. This information was utilized in the Town Board's identification of impacts in preparing the Part 2 EAF. In order to assess whether the potential impacts identified by the Town Board, with input from the Planning Board, Town staff, the Town's consultants, and comments at the public hearing, may have a significant adverse impact on the environment, the impacts reasonably expected to result from the proposed action were compared against the criteria for determining significance provided in 617.7 of the SEQR regulations.

Based on this analysis, the Town Board has not identified any large or significant adverse impacts on the environment as a result of the proposed action. Instead, the potential impacts identified using the criteria provided in Part 2 of the EAF were found to be small to moderate in importance, particularly in consideration of their magnitude, geographic scope, irreversibility, duration, number of people affected, and probability. The Town of Alfred Town Board therefore issues a Negative Declaration for the Project.

The following information has been provided to document the findings of the Town Board with regard to the significance of potential adverse environmental impacts.

3.1 Impact on Land

The Jericho Hill Road Solar Farm (Project) would consist of about 11,440 freestanding solar modules, a gravel access road, security fencing, new electrical equipment, equipment pads, and landscaping as a visual buffer between adjoining uses and properties. The access road has been extended within the solar array and designed using a geosynthetic product specification for sufficient load rating, to ensure that emergency vehicles can readily access all portions of the solar array. The area occupied by the solar panels and associated facilities would fall within approximately 30.9 acres ("limit of disturbance") of the approximately 162 acre site.

Ground Disturbance

Ground disturbance associated with construction of the solar panels would affect about half (14.5 acres) of the 30.9 acre limit of disturbance area. Ground disturbance is associated with the installation of the panel posts, access road, fencing, filter strips, inverter pad, utility

trenching, vegetation and tree removal/cutting, and temporary construction staging, office and parking areas.

Within the existing cleared areas of the site, such as agricultural fields, the installation of the solar panels will be accomplished with little overall ground disturbance, as panel supports are usually constructed with driven H-piles. However, a portion of the solar array will be installed within an area that is currently wooded. Removal of trees and vegetation in this area, totaling approximately 10.6 acres, would involve clearing and grubbing, using a bulldozer and stump grinder. Trees would also be cut in a second wooded area (approximately 1.6 acres), east of the power line easement, in order to prevent shading of the panels. However, grubbing and stump removal would not occur in this area. The Applicant indicates that tree cutting would be scheduled during a period when the ground is frozen, if possible, in order to minimize impacts of the movement of vehicles and equipment over the surface.

Areas of ground disturbance would be restored and re-seeded to prevent erosion. Details regarding erosion prevention measures are included in the Stormwater Pollution Prevention Plan (SWPPP), prepared for the Project site in accordance with New York State Department of Environmental Conservation (NYSDEC) regulations.

Depth to Bedrock

Per the Part 1 EAF provided by the Applicant, the depth to bedrock at the Project site is listed at approximately 3.5 feet below the surface. Early details submitted by the Applicant show the H-Piles to be installed at depths of up to 9.5 feet. If concrete footers are needed, the submitted detail shows a depth of approximately 6.5 feet. It is unknown how often or in what locations bedrock will be encountered during installation of H-Piles, as no geotechnical borings were undertaken to provide information on sub-surface conditions.

When bedrock is encountered during the pounding of the H piles, posts can be bent, twisted or mushroomed and may not be embedded deep enough to meet structural standards or pass inspection tests. The Applicant indicates that in instances where bedrock is encountered, they plan to utilize concrete footers or screwposts to achieve the necessary stabilization of posts and mitigate structural concerns.

The shallow bedrock would increase construction-related impacts, including noise during installation activities, as well as the extent of ground disturbance. Specifically, the use of concrete footers requires a greater degree and depth of soil disturbance, both during construction and during decommissioning. Excavators would be needed to create a cavity to contain the concrete footers and would be needed again to remove the concrete during decommissioning. Concrete trucks would need to travel to and within the Project site to access the areas where concrete pours are needed for the footers, increasing truck trips on area roadways.

The impacts described above would be confined to the construction period and once operational, the solar array would not be associated with significant noise, truck trips, or continuing ground disturbance. With regard to drainage, the Applicant provided a worst case analysis indicating that stormwater management requirements would be met for the Project even if every post installed for the array required a concrete footer and those footers were installed with no soil depth atop the footer. LaBella Associates (the Town of Alfred's engineering/environmental consultant) has reviewed the worst case analysis and has confirmed that the inclusion of concrete at each pier would not negatively impact the stormwater management calculations as currently provided. The worst case calculations

continue to show no increase in peak flow rate, which would meet NYSDEC stormwater requirements. In addition, appropriately cited and maintained concrete wash-out areas would be required for compliance with the erosion and sediment control standards.

Depth to Water Table

The proposed Project would occur on land where depth to water table is less than three feet. Per the Part 1 EAF provided by the Applicant, the average depth to groundwater on the Project site is just over one foot. Given the shallow water table and the potential for erosion and sedimentation impacts, the Town of Alfred will require the contractor to implement erosion control measures in accordance with the SWPPP prepared for the Project site.

The shallow depth to groundwater may affect the Project design which calls for a limited use pervious access road, and the detail for this roadway indicates a cut area of 8-inches minimum. In some area with shallow water table conditions, the water that is intended to flow through the pervious access road would not drain as intended, and the access road would not effectively function as a "pervious" surface. If groundwater conditions at the proposed site do not allow for use of a limited use pervious access road, the Applicant would need to change the design of this road and demonstrate with a revised SWPPP that the project still is able to meet stormwater management requirements.

An Operation & Maintenance Plan has been submitted that details how the site would be maintained and will include the requirement for annual inspection and reporting, and, if necessary, corrective action to ensure functionality of stormwater management measures. Additionally, the Applicant has prepared a Decommissioning Plan, including a financial security instrument, to protect the Town from a scenario in which the solar project is abandoned in place (i.e. the Town would have the financial wherewithal to remove the solar facilities in such an instance and return the land to productive agricultural or other use). Based on the information above, no large or significant impacts on land have been identified.

3.3 Impact on Surface Water

A wetland delineation conducted on the site indicates the presence of federal wetlands regulated by the U.S. Army Corps of Engineers (USACE) within and around the proposed Project area, as well as two ephemeral streams and one perennial stream. The perennial stream is classified by NYSEC as a Class C unprotected stream which is a small tributary to a tributary to Canacadea stream within the Village of Alfred. The delineated wetlands and streams are shown on the plans submitted by the Applicant.

The proposed array avoids any construction within DEC or USACE regulated wetlands or adjacent areas or impacting the perennial stream. Fencing, racking and solar panels would be installed along portions of the ephemeral streams totaling around 100 linear feet (+/- 200 s.f.) of temporary impact. Fencing, racking and panels would be installed in such a way as to maintain the existing drainage.

Ground disturbance within the approximately 14.5 acre area has the potential to result in a large impact on surface water if the exposed area is not managed with appropriate stormwater and erosion control measures. New York State law requires that development

not increase the peak flow rate of stormwater leaving a site post-development. In other words, stormwater peak flow rates after the installation of the solar array must be demonstrated to be equal or less than stormwater rates under existing conditions. Stormwater management measures are typically proposed in a SWPPP to manage or detain stormwater flows in order to achieve regulatory compliance.

For the Jericho Hill Road project, the Applicant has provided and would implement a SWPPP prepared in accordance with NYSDEC requirements. The SWPPP demonstrates that under the current design, peak flow rates would not increase post-development. The stormwater management plan for the current design is based on the following parameters:

- the access road to the site will be designed as a limited use pervious access road;
- construction will be sequenced such that no more than five acres will be disturbed at any one time, and a 5 acre waiver from NYSDEC would not be necessary. (The Applicant plans to provide a formal phasing plan to elaborate on how the proposed construction activities will be accomplished);
- stormwater runoff would follow existing drainage patterns and no specific stormwater management measures or facilities are necessary to achieve compliance with NYSDEC peak flow requirements; and
- water quality treatment for the concrete equipment pad would be addressed via grass filter strip and level spreader.
- to maintain sheet flow and to reduce possible erosion and runoff throughout the project site, level spreaders will be installed parallel with the existing contours at intervals of 50 feet within the area of the solar panels

If prior to building permit issuance or construction, the Project design is changed such that any of the above parameters are no longer met, a revised stormwater management plan would be required along with confirmation of compliance with NYSDEC requirements.

The SWPPP also includes design plans that address how disturbed areas must be stabilized (seeding, mulching, geotextile, etc.) within 14 days, as well be inspected and maintained in accordance with the New York State Standards and Specifications for Erosion and Sediment Control (aka Blue Book). The Owner must be responsive to any deficiencies noted during weekly/twice-weekly inspections throughout active soil disturbance. Finally, the Operations and Maintenance Plan will be updated to include a requirement for annual inspections of stormwater components to confirm proper functioning.

As stormwater management would be accomplished under the SWPPP and the solar panel structures would not impede the function of the wetlands or streams, no large or significant impacts have been identified to surface water.

3.7 Impact on Plants and Animals

The U.S. Fish & Wildlife Service IPaC website lists the Northern Long-eared Bat, a federally-listed threatened species, as potentially present on the site. However, records maintained by NYSDEC's Natural Heritage Program do not indicate presence of the bat in this area. Moreover, according to NYSDEC, the Project site does not contain any critical habitats, and there are no records of rare or State-listed animals or plants, or significant natural communities on, or in the immediate vicinity of the site.

The installation of the solar array involves the removal of approximately 12 acres of wooded habitat from the site. The 12-acre portion to be cleared is part of a larger forested area that extends north and south of the proposed solar site along a ridgeline to the east and is bisected by an electric transmission line.

Based upon a tree inventory undertaken by the Applicant's consultant, Bergmann Associates, the forested area is a predominantly maple-beech mesic forest. The majority of the trees are roughly 10 inches in diameter, with some randomly dispersed larger trees (15-20 inch diameter). Predominant species include beech, maple, cherry, ash, basswood and hophornbeam trees. The forest is a mid-successional young forest with a sparse herbaceous layer, some shrubs and samplings, many young trees and some old trees, typical of an upland, dry, sloped forest. The woodland is estimated to be between 20 and 40 years of growth.

The installation of the solar array would result in the clearing of trees and brush, and removal of stumps, within about 10.5 acres of wooded area that falls within the site boundary. This wooded area would be replaced by the solar panel array with a ground cover of herbaceous plants, seeded with a pollinator mix. Trees would also be cut in a second wooded area (approximately 1.6 acres), east of the power line easement, in order to prevent shading of the panels.

The presence of nearby wooded areas adjacent to the site and within the larger forested ridgeline would mitigate the effects of habitat loss or change, and therefore, no large or significant adverse impacts on tree or wildlife species have been identified.

3.8 Impact on Agricultural Resource

The Project site is not located in an agricultural district. The proposed Project would occupy approximately 22 acres of soils listed as farmland of statewide importance according to the United States Department of Agriculture (USDA) Web Soil Survey. The New York State Department of Agriculture and Markets (NYSDAM) Soil Mineral Groups has the soils listed as being in groups 6, 7, & 8. Prime Farmland (if drained) is also present in the wooded portion of the site, however, this area is not currently used for agricultural purposes.

All of the land occupied by the solar array would be available to return to agricultural use at the end of the useful life of the Project, estimated at approximately 30 years. The proposed action includes a Decommissioning Plan, including a financial security instrument, to protect the Town from a scenario in which the solar project is abandoned in place (i.e. the Town will have the financial wherewithal to remove the solar facilities in such an instance and return the land to productive agricultural or other use). As a result, no large adverse or irreversible impacts on agricultural are anticipated.

3.10 Impact on Historic and Archeological Resources

The Project site is not located within an archeologically sensitive area, but it is near to one National Register eligible resource, the Alfred University President's House. Project information has been reviewed by the New York State Historic Preservation Office (SHPO), and a No Effect letter was issued by the agency. This letter indicates that no further investigation of historic or archeological resources at the sites is necessary. As such, no large

or significant impacts to historic or archeological resources have been identified. Correspondence from SHPO is attached.

3.14 Impact on Energy

The Project involves the development, installation and operation of a solar photovoltaic facility which will produce and transmit energy into the Utility electrical grid. In addition to compliance with the Town of Alfred Solar Law, the design and safety of the solar facility are regulated by design guidelines found in the NYS Uniform Fire Prevention and Building Code, the NYS Energy Conservation Code, and the National Electric Code (NEC), as well as national and international electric industry standards [eg. Institute of Electrical and Electronics Engineers (IEEE); International Electrotechnical Committee (IEC)]. Compliance with these standards ensures the safety and integrity of the electricity produced by the solar array and its smooth interconnection with the existing Utility grid.

Potential impacts regarding the electric system, including harmonics (dirty electricity), stray voltage, etc. would be avoided if the solar facility is designed in compliance with the applicable codes and industry standards. Potential environmental impacts associated with these technical issues were addressed by the Applicant and reviewed by electric engineers at LaBella Associate. Responses to potential impacts are summarized as follows:

Harmonics: Inverters go through a stringent approval process in order to receive approval to operate in parallel with the utility grid. One of the pertinent standards that inverters must comply with is IEC 61000-3-4 which governs the amount of total harmonic distortion produced. This standard is created by the International Electrotechnical Committee (IEC).

According to the manufacturer's specification sheet, the inverters to be used in the Jericho Hill Road Solar Farm will produce a maximum harmonic distortion of <3%. The IEC 61000-3-4 limit for harmonic distortion for electrical equipment like these inverters is <3%. As such, the proposed inverters comply with the governing International Electric Code Statutes, and issues of harmonics ("dirty electricity") would be avoided at this site.

In addition, LaBella's electrical engineers note that compliance for harmonics is covered in IEEE 1547-2018, specifically Article 7.3. LaBella has confirmed with the Applicant that the inverters will be compliant with this standard, and a specification sheet documenting compliance has been provided.

Current Flow during Overproduction: There is no current flowing to the ground during operation of the system, even during array overproduction. LaBella adds that the inverters will limit the maximum output safely. Solar arrays properly designed in conformance with the National Electric Code (NEC) would avoid potential impacts associated with such issues.

In the event that the facility is disconnected from the utility system either voluntarily or through operation of a protective device at the connection to the electrical distribution system or within the boundaries of the array, the system will not generate power. The inverter units which convert the DC current from the solar modules to AC power, discontinue operation as they require a reference voltage to operate that is only

available if the electrical circuit is complete from solar modules to utility. The solar modules will still act under solar radiation to produce a DC current, however, because the inverter units will not operate, this 'remains' as a stored current in the DC wires from modules to inverters.

Stray Voltage: All metal components of the system would be grounded, as required by the National Electrical Code (NEC). This eliminates the potential for stray voltage. Technical drawings to demonstrate compliance were provided by the Applicant in the initial submittal package.

In addition, the installation must comply with Articles 250 and 690 Part V of the NEC for grounding and bonding to eliminate any potential ground currents. As a result, the facility would be designed to include a device to detect any ground current and de-energize the facility safely, if a ground fault should occur. The Utility also includes monitoring for ground faults.

The possibility of a stray voltage to ground is limited, but if it were to occur, there are several solutions that are implemented to eliminate potential adverse impacts. Firstly, grounding is provided for metallic structures such as racking, fencing, enclosures, solar module frames, etc. that ensures that the parts are 'bonded' together and that there is no opportunity for a difference in potential between metallic parts that can lead to a voltage path. The grounding will be connected to the general mass of earth to ensure that the installation complies with the National Electric Code requirements to reduce or eliminate voltage accumulation by dissipation to the ground. Racking and additional grounding rods at equipment pads, fencing and racking provide the path to ground.

Protective devices detect any ground faults in the system and are designed to disconnect the part of the installation where the fault has occurred within milliseconds.

One additional physical code requirement defines the distance between adjacent metallic parts of a system that are not directly bonded together to eliminate the possibility that a body can be in contact with metallic parts that may be at different potential (voltage) levels.

Magnetic Fields: LaBella electrical engineers indicate that the electromagnetic fields (EMF) associated with the overhead transmission lines of the solar array would be similar to the EMF created by typical overhead utility lines serving residential and commercial properties. The overhead transmission lines of the solar array are of similar voltage levels to the typical overhead utility line and convey similar or lesser currents. Cables must be installed at heights compliant with National Electrical Safety Code requirements. EMF concerns are normally relevant at transmission system voltages, however this community solar facility would be interconnected at the distribution feeder level of the utility. As a result, no significant issues regarding the safety of EMF have been identified for the Project.

It is noted that most of the issues above are not typical concerns for Town review and approval, as they are Uniform Code compliance issues for which compliance is required before stamped engineering drawings or other certifications necessary for operation can be obtained. The receiving Utility will also require stringent technical compliance with Utility

interconnection standards before interconnection with the grid is allowed. If unanticipated electrical issues arise during operation, the receiving Utility will address them directly with the owner-operator of the solar facility.

3.15 Impact on Noise, Odor, and Light

No impacts on odor or light would result from the proposed Project. During construction, noise would be created by the movement of trucks, operation of equipment, and installation of the piles, racking and panels. During operation, noise from the Project would be minimal.

With regard to noise during Project construction, a pounding noise associated with pile installation would occur and may be exacerbated due to the shallow bedrock. Standard industry data for pile-driven solar racking posts indicates that the pile driver can produce a maximum instantaneous sound level of 84 dBA at 50 feet when the hammer is operating. However, a pile driver only operates at full power for a short period of time during post installation. Based on the standard noise attenuation rate of minus 6 dBA per doubling of distance from point sources, maximum off-site instantaneous noise levels from the pile driver operating at full power would be approximately:

- 84 dBA at 50 feet away (equal to the sound of an alarm clock)
- 78 dBA at 100 feet away
- 72 dBA at 200 feet away (equal to the sound of a washing machine)
- 66 dBA at 400 feet away
- 60 dBA at 800 feet away (equal to the sound of an electric toothbrush)

As the nearest residences are located at a distance of approximately 325 feet away on both Jericho Hill Road and Pine Hill Drive, an outside noise level of approximately 70 dBA might be expected at these residences during pile driving activities. This estimate does not account for intervening vegetation or other obstructions which would likely attenuate (or decrease) noise levels. For comparison purposes, the existing background noise levels in areas similar to the project vicinity typically occur in the range of 55 dBA to 65 dBA.

An additional comparison can be made with standard farm equipment that might be utilized on agricultural properties in the vicinity of the project site. Such equipment, including tractors and combines, operate at a noise range of 90 dBA to 97 dBA at 50 feet, producing noise at a factor of 10 higher than the proposed racking installation by pile driver.

Construction activities are expected to be completed over the course of eight months, however, the Applicant indicates that pile driving would take place over an approximately 3 to 4 week period (with an additional one to two weeks if a significant number of concrete pilings are needed). Increases in noise levels as a result of construction activities would be intermittent and temporary in nature. The Applicant proposes construction hours Monday through Saturday between the hours of 8 am and 6 pm. While the Town of Alfred's Noise Limit Law (1983 Local Law #1) does not specify acceptable hours of construction, it generally regulates noise at property boundaries between the hours of 10 pm and 8 am. In this regard, the Applicant's proposed construction hours are in conformance with Town noise guidance.

Once operational, there would be some noise from the inverters and the tracking panels, but such noise is expected to be minimal and to dissipate quickly with increasing distance from the panels. As a result, no large or significant noise impacts are anticipated when the solar array is operational.

3.17 Consistency with Community Plans

Solar energy systems are allowed under Town Code as a specially permitted use within the Agricultural District, where this Project is sited in the Town of Alfred. No solar arrays currently exist within Town boundaries. The proposed solar array would therefore be a distinct land use, different from the existing rural land use pattern of nearby properties, which include a mix of agricultural, wooded, and some residential uses.

The proposed action is unlikely to induce significant new growth, promote development, increase density or require expanded public infrastructure within the designated rural or residential areas. The purpose of this Project is to generate clean, renewable energy for local residences and businesses and not as a means to stimulate development.

The submitted Operation & Maintenance plans indicate how the Applicant proposes to maintain the solar energy system with regular monthly mowing and without the use of pesticides. The Decommissioning Plan illustrates the sequence of construction activities to remove the solar array once it has been permanently taken off line and to return the land to its pre-development state. Financial security is included in the Decommissioning Plan to assure that the Town would have the financial wherewithal to remove the solar array if the Owner/Operator of the array is unable to do so at the time. Although some components of the solar array may be recyclable, salvage value is not deducted from the decommissioning bond. The Decommissioning Plan is consistent with the Town's Solar Law with regard to its content and financial security.

3.18 Consistency with Community Character

The development of the solar facilities on the proposed site would result in a distinct visual contrast with the existing rural and agricultural character of the Town of Alfred. The uses surrounding the site of the solar installation primarily include plowed fields and agricultural crops, forested areas, roadways, and residences. The location of the Project utilizes existing wooded areas to minimize views into the site from Jericho Hill Road.

The racking and panels are set back a minimum of 600 feet from Jericho Hill Road, approximately 520 feet from the closest residence on Jericho Hill Road, approximately 325 feet from the closest residence on Pine Hill Drive. Much of the frontage along Jericho Hill Road in the vicinity of the solar array is vegetated with trees, or wooded areas, which already screens views into the area where the solar panels would be developed.

Photo simulations of the solar array were prepared by the Applicant to illustrate the potential for views of the solar panels from multiple viewpoints on Jericho Hill Road, Randolph Road, and Snyder Drive and are on file at the Town Hall. The Photo Simulations demonstrate the relatively dense buffer of trees and wooded areas along these roadways, and identify potential gaps in the buffer that could allow views. While no photo-simulation was prepared from the residential subdivision north of the site along Pine Hill Drive, a gap in existing wooded buffer which could allow open views of the solar array was identified there.

A supplemental Landscaping Plan was added to the engineering drawings by the Applicant to respond to questions posed by the Town Board and public comments regarding the photo-simulations, views, and potential visual impacts. The plantings proposed on the Landscaping Plan are designed to fill gaps or bolster existing vegetation by adding evergreen trees and shrubs in specific areas. The new plantings vary between approximately 180 and 300 feet in length and include tree species such as Eastern Red Cedar, Norway Spruce, White Fir, Eastern White Pine. Plantings are proposed on the site along the inside edge of the existing tree line parallel to Jericho Hill Road, on either side of the entrance drive, and at the gap at the residential subdivision site along Pine Hill Drive. Other areas may also receive landscaping at the Applicant's discretion or Town Board request, once construction is complete.

The solar arrays would most commonly be viewed from local roads, particularly Jericho Hill Road, during routine travel by Town residents or visitors. It is anticipated that the existing setbacks, along with the existing and proposed vegetative screening, would mitigate visual impacts by minimizing the immediate foreground views of the panels and racking. This area is not heavily populated and the number of people traveling by the sites is relatively low.

In addition, the Decommissioning Plan and financial security provided by the Applicant is an assurance that the solar array will ultimately be removed and the site restored to pre-construction conditions. The Decommissioning Plan includes photos of the pre-construction conditions. It is envisioned that the Town leaders of the time, in coordination with the property owner and the Solar Owner/Operator, can determine how the site should be restored, including whether the current wooded area be allowed to return to a forested state.

As a result, no large or significant impact on community character is anticipated.

The Town Board also notes positive environmental impacts resulting from the increase in the use and reliance upon renewable energy as a result of the proposed solar installation.



**Parks, Recreation,
and Historic Preservation**

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

July 16, 2021

Stephanie Parsons
Natural Resource Scientist
Bergmann
280 East Broad Street
Suite 200
Rochester, NY 14604

Re: USACE
Jericho Hill Road Solar Farm Project (5MW/27.56 Acres of 162.10 Acre Parcel)
5568 Jericho Hill Road (Parcel ID: 164.-1-8.1)
Alfred, Allegany County, NY
21PR03110

Dear Stephanie Parsons:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the submitted materials in accordance with Section 106 of the National Historic Preservation Act of 1966.

The project is near to one National Register eligible resource, the Alfred University President's House. We have reviewed the project for its potential impact on the Presidents House.

We understand that the solar farm project will not be visible from the President's House. It is the opinion of SHPO that the project will have No Adverse Effect on historic resources.

If you have any questions, I can be reached at sloane.bullough@parks.ny.gov.

Sincerely,

A handwritten signature in black ink that reads "Sloane Bullough".

Sloane Bullough
Historic Sites Restoration Coordinator by email only