

December 31, 2021

Mr. Joseph Lupia
Town of Manlius Planning Board
301 Brooklea Drive
Fayetteville, New York 13066

Re: Proposed Solar Array: Town of Manlius Landfill

Dear Mr. Lupia

Miller Engineers has conducted a preliminary review of the above referenced project submission to the Town of Manlius Planning Board. The solar array proposed for the Town of Manlius Landfill location is required to meet the requirements of Section 155-27.2 Solar photovoltaic energy systems of the Town Code. In addition to recently received documents from the applicant, the following items should be requested submittals as outlined in the Town Code for review of the proposed project:

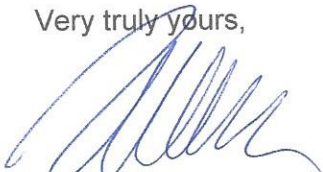
- View sheds and screening. Adequate measures shall be taken to screen through landscaping, grading or other means to mitigate the view of the solar panels and other equipment of the solar systems from roadways and neighboring residential properties. Digital model-based renderings have been submitted on recent similar projects
- Solar system must meet all Federal Aviation Administration requirements, and documented as compliant.
- Lightning protection. All solar systems shall have adequate lightning protection via internal lightning arrestors, surge protectors or adequate grounding.
- Utility notification and approval. No solar system shall be constructed until evidence has been given to the Town Board that the utility company that operates the electrical grid where the installation is to be located has been informed of the construction of the solar system and has agreed to an interconnection.
- Access road. Local first responders have requested the proposed access road to be twenty feet wide in accordance with all other solar arrays in the Town
- Property operation and maintenance plan is required. Plan shall also address Town requirements to access the site for environmental monitoring associated with landfill closure plan including but not limited to water sampling, air sampling, site security and landfill cap/cover maintenance & mowing. Town Highway Dept currently conducts mowing of the landfill cover 2-3 times per year. Formal input and coordination on these operations from the Highway Dept should be obtained by the applicant and included in the operation and maintenance plan. Coordination of the operation and maintenance plan should be coordinated with NYSDEC and documented in the submission to the Planning Board and incorporated into current procedures as required.
- Decommissioning plan and security

In coordination with the Planning Board issuing a special use permit, the Planning Board shall review the site plan for the GMSs pursuant to Section 155-28 Site Plan Review of the Code. The following submission requirements are of special note and must be observed regarding a site plan application.

- Submit a stormwater management plan, certified by a professional engineer that demonstrates stormwater runoff will infiltrate into the ground beneath at a rate equal to that of the infiltration rate prior to the placement of the system. Stormwater issues have arisen on other recent solar arrays within the Town and submission of a Stormwater management plan for this site is imperative. Applicant has indicated pursuit of a waiver for this activity. It is strongly advised that a stormwater plan be submitted by the applicant for this site in accordance with local regulations and potential impacts to stormwater reporting criteria on the site required by the Town Landfill closure operation and maintenance program.
- Location and elevation of the proposed solar system.
- Electrical diagram detailing the installation, associated components, electrical interconnection methods with all National Electrical Code compliant disconnects and overcurrent devices.
- Documentation of the major system components to be used, including PV panels, mounting system additional on-site poles, structures, and inverters.
- Location of all existing aboveground utility lines and other on-site solar energy conversion systems within 1,200 linear feet of the site.
- Plan showing proposed changes to the site including grading, clearing, lighting, screening, and structures.
- All applications shall be accompanied by a long environmental assessment form, including a visual impact analysis.
- Digital elevation model-based project visibility map showing the impact of topography upon visibility of the project from any affected locations.
- That there be reasonable compatibility on all respects with any structure or use in the neighborhood, actual or permitted, which may be directly substantially affected.
- Details approvals and need for oversight on any on-site proposed modifications and/or penetrations to the existing NYSDEC landfill cap to be coordinated and approved by NYSDEC.

Additionally, it is advised that the entire submission for the project be coordinated with NYSDEC for their input and approvals as to integrate any requirements into the site closure requirements and annual reporting of the same. Other recent site reviews for solar arrays have including integration of impacts of glare, migratory bird overview and potential environmental impacts of internal panel construction material review and insight and should be considered by the Planning Board

Very truly yours,



MILLER ENGINEERS

Douglas A Miller, P.E.