



**Cortland County Soil and Water Conservation District**

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*SWCD...established to promote the conservation and wise use of our county's natural resources*

September 29, 2020

Bruce Weber, Planning and Zoning Officer  
Town of Cortlandville  
3577 Terrace Road  
Cortland, NY 13045

Re: Cortlandville II and III, Bell Crest Drive

Dear Mr. Weber:

We have reviewed the proposed plans for the above-referenced solar array sites on Bell Crest Drive off Blue Creek Road. The two projects were reviewed together because they are immediately continuous. These projects combined encompass 111.3 acres, of which approximately 2.38 acres are proposed to be disturbed to install elevated ground-mounted solar arrays. The projects were designed by Delta Engineering, Architects and Surveyors. Our review included consideration of permit application materials, SWPPPs and design packages dated 7/22/20 for both projects, updated plan sheets dated 9/18/20 provided by the applicant, a site visit to the property on 9/25/20 and communications with the applicant and the design engineer who clarified details of the proposed solar arrays and stormwater facilities on the property.

We offer the following comments on this proposed project:

General

General concerns associated with installation of solar arrays include: 1) erosion and sediment control (ESC) practices during construction, 2) successful establishment of permanent vegetation after installation, 3) maintenance of adequate vegetation on the entire site relative to site slope, vehicle usage, and shading, 4) maintenance of adequate vegetation in particular areas where panels would be perpendicular to the slope and concentration of flow off panel drip edges would have the greatest potential to cause erosion and 5) inspection and maintenance requirements to ensure that additional actions are taken if vegetative coverage is ever inadequate to control erosion.

Stormwater

- In the past, the general area of these projects has caused flooding problems for landowners downgradient. Thus, any ground disturbance and/or removal of woody vegetation that would hasten water flow and movement of sediment must be avoided or mitigated during project installation and operation.

- A stormwater retention basin is present on Cortlandville III that should be protected from any additional flows or sediment so that its design goals remain intact. The 9/18/20 project plan sheets appear to avoid the basin but do not acknowledge the significant ditch that currently runs from the north wetland to the stormwater basin. The effects of this ditch on solar panel installation and vice versa, and associated stormwater effects must be considered in future design work.
- Because approximately half of the property is classified as hydric soil group (HSG) C (slow infiltration) and 53.1% is classified as HSG D (very slow infiltration), indicative of high runoff potential, ESC during installation, avoidance and mitigation of impacts on hydrology, and prompt and successful revegetation of disturbed areas will be critical to avoid excess flows and erosion off the site.
- We strongly encourage the use of species native to central New York wherever possible for the benefit of pollinators, songbirds and other wildlife species. We recommend that the proposed conifer buffers be planted with native New York tree species and that all other revegetation of disturbed areas be planted with suitable NY native plant species. Solar arrays are compatible with reestablishment of ecological values such as habitat for pollinators and songbirds and commercial seed mixes are available that do not interfere with solar panels. Additional links regarding the compatibility of solar arrays and native plants are below:

<http://bedford2020.org/pollinator-friendly-solar/>

<https://www.solarpowerworldonline.com/2017/05/pollinator-friendly-solar-vegetation/>

<https://encorerenewableenergy.com/planting-pollinator-forage-at-encores-solar-arrays-a-triple-bottom-line-success-story/>

<https://www.utilitydive.com/news/pollinator-habitats-the-bees-knees-of-rural-solar-development/530716/>

Based on our review, we believe the SWPPPs and associated materials meet the intent and requirements of the Town's stormwater ordinance.

Please call me at 756-5991 if you have any questions.

Sincerely,



Kathleen E. McGrath  
Water Quality Specialist

Cc: Amanda Barber, Cortland SWCD  
John Switzer, SSC Cortlandville II and III LLC  
Jeffrey Palermo, Delta Engineering