17 Computer Drive West
Albany, NY 12205
518.438.9900

70 Linden Oaks, Third Floor, Suite 15
Rochester, NY 14625
585.866.1000

Via Overnight Delivery

February 3, 2026

Town of Homer
Planning Board
31 North Main Street
Homer, NY 13077

Attention: Michael McMahon, Planning Board Chairman

Re: Response to Comments Summary
Scott Road Solar
331 Houghton Hill Road
Homer, New York

Dear Mr. McMahon,

On behalf of our client, Seaboard Solar, we are pleased to submit this response to comments summary to the Town of Homer for the above referenced project. This summary is in response to the various comments received in the January 23, 2026 letter from Timothy C. Buhl, P.E., as noted below with our responses in italics.

Please find the following items in support of our application:

A. Seven (7) copies of Part 1 of the FEAF, consisting of fifteen (15) pages, prepared by Bohler, last revised January 28, 2026
B. Seven (7) copies of the Report of Geotechnical Investigation, consisting of thirty-two (32) sheets, prepared by Whitestone Associates Engineering & Geology NY, PLLC, dated January 15, 2026, no revisions listed.
C. Seven (7) copies of Site Development Plans (full size) for Scott Road Solar, LLC consisting of nineteen (19) sheets, prepared by Bohler Engineering, dated May 6, 2025, last revised February 2, 2026.
D. One (1) copy of the Stormwater Pollution Prevention Plan (SWPPP) for Albany Road Solar, consisting of 234 sheets, prepared by Bohler Engineering, dated September 22, 2025, last revised February 2, 2025

I. Timothy C. Buhl, P.E. Engineering Comments

1. Decommissioning Plan has been upgraded and the bond amount significantly increased.

   Comment noted.

2. The new O&M plan has some minor changes, mostly to reference the proper Town contacts.

   Comment noted.

3. The permit package is still lacking in specific details relating to this particular site. For example, the method of array mounting, racking embedment details, fencing details, & the erosion control sections only reference the generic types & components, all subject to change.

The generic details will be updated as required once final array racking specifications are finalized and submitted with the construction plans and building permit application.

4. There still is no Geotech Report on the soil mantle thickness/depth to bedrock.

   A Geotech Report has been completed and is being included in this resubmission, as requested. Per the report, depths to bedrock vary throughout the site from ±0.9 feet to ±5.5 feet below grade. The grading has been revised so that there are no areas of deep cut that would conflict with the existing bedrock. Additional testing along the proposed utility corridor is forthcoming and results will be provided to the Town upon receipt.

5. No cut and fill sections shown for the regraded areas, nor are any earthwork balance quantities shown. From experience I know that the shale bedrock depths are typically a shallow 18" to 30" depth in the proposed disturbed project areas, which will impact any regrading needed, runoff/groundwater seepage to the surface, as well as the placement of any array screw-type anchors/supports. These may have to be changed to driven piles or drilled into the bedrock.

   Cut and fill sections for regraded areas and earthwork calculations have been added to the plans, as requested. The grading has been revised so that there are no areas of deep cut that would conflict with the bedrock. Per the provided Geotech report, it is recommended that screw anchors be used, with pre-drilling as required.

6. Concerning the SWPPP document and Hydrology model, DP-1 was moved the recommended location at the Houghton Hill Road culvert crossing, but the requested sub-catchment/reach boundaries and points are still not shown on the drawings.

   The subcatchments and reach points are shown on the existing and proposed condition watershed maps. Refer to the legend shown on both watershed maps. The HydroCAD and Watershed Maps have also been updated to show matching names throughout for clarification.

7. The hydraulic model references only 2-4% slopes in the disturbed areas, when in fact there are some array areas over 8% and downslope, and over 50% in the leased ROW strip for the overhead interconnection line down to West Scott Road.

   The model shows a Time of Concentration that is the slowest path in terms of time, which is standard practice, and may not necessarily show all slopes within a subcatchment area. The time of concentration within the subcatchment area containing the utility corridor has been revised appropriately and better reflects the steep slopes.

8. The drawings should have the requested sub-catchment/reach details added to the drawing so the model can be verified, and the model should be corrected to reflect all the actual site conditions, including the steeper slopes.

   The drawings and HydroCAD have been revised to show matching names throughout for clarification. The time of concentration within the subcatchment area containing the utility corridor has been revised appropriately and better reflects the steep slopes.

9. Seeding, regrading & reclamation measures for disturbed soil areas have been upgraded to NY Specifications. There have also been upgrades to erosion control plans and details for the main array site – new vegetative buffer/grass filter strips along the access roadway & laydown area

are noted, along with silt fences, and new temporary straw wattles, grass filter strips, and a new pea gravel diaphragm/infiltration trench is shown in the steeper south end of the array area running across the ground contours.

Comment noted.

10. The tree removals have been outlined on the site, and the note on the total acreage has been appropriately revised. That said, there has been a change to the tree removals, in that the eastern narrow steep slope down to the National Grid interconnection point will be trimmed/cut down but no stumps removed. The applicant should model the effect of the canopy removal which will impact runoff on these steeper slopes to determine what the runoff impact will be. While the water bars now proposed (every 75' downslope) will help in this regard, we have concerns that the tree removals, temporary construction for the access roads, and equipment traffic for the pole placements & cabling will cause rutting of the site and result in more erosion and runoff problems. This should be planned for and documented in the SWPPP document.

    The model previously showed canopy removal from the utility corridor, however the appropriate time of concentration is now being shown with the updated modelling. Construction of the utility corridor will be limited to the drier months of June – October to help prevent risk of rutting and further erosion. The corridor will then be stabilized prior to the rainy fall season.

11. It is still suggested that a settling/retention practice should be installed at the base of the hill at the interconnection point, in order to prevent damage to West Scott Road.

    The existing drainage ditch at the bottom of the slope has been enlarged to better hold runoff associated with the utility corridor, as requested.

12. On a different note, I have marked up the LFEAF that was re-submitted, as there were several items that were either left blank or inaccurate. Please request the applicant address these items quickly so that the Town can proceed with the SEQRA process.

    The FEAF has been revised and is being included as a part of this resubmission, as requested.

13. I feel the applicant should still provide the Town with more detailed information to address the additional comments outlined above (especially the bedrock depth/grading issue), provide the Geotech Report and grading sections & yardage balance data, as well as refine the model on the more critical steeper sections of the disturbance areas. As before, I would still suggest that the Town schedule a meeting with key project individuals and local planning staff to discuss these concerns and any other issues that crop up before proceeding with the SEQRA process and for any permit approvals.

    The Geotech report is being included as part of this resubmission, along with cut and fill/earthwork calculations. The HydroCAD model has been revised to show steeper sections of the disturbed area. The applicant met with Town staff on 1/29 to review the comments provided herein. The responses provided and changes made to the plans and SWPPP are consistent with the discussion with Tim Buhl and Town Officials during last week's meeting.

Should you have any questions, or any additional needs please do not hesitate to contact our office at steven.wilson@bohlereng.com or at 518-438-9900.

Sincerely,

Bohler Engineering NY, PLLC

Steven R. Wilson, LEED AP
Project Manager