



150 John Vertente Blvd. | New Bedford, MA 02745

| 508-995-0192 x13 | M. 508-328-7877 | F. 508-207-1147 |

3/31/2023

VIA EMAIL

Town of Riga
Town Board

RE: Mumford Solar Farm

Project Address: 63 Riga Mumford Rd, Churchville, NY

Project Applicant: TJA-NY-Mumford Solar Farm, LLC

Dear Mr. Supervisor and Town Board Members,

Thank you for hosting our project on March 8th, 2023. We value the comments and concerns raised by the residents as we believe this helps us achieve a more acceptable project by making modifications per their concerns. We have provided responses below to the questions raised. Some of the answers address multiple comments as they were related.

Comment 1: Concern regarding the aesthetics of the facility.

Response 1: Based on the results of the visual simulations provided in the December 14th, 2022, submission and several site visits, it is concluded that with the addition of the vegetative screening, this project will have little visibility. This project utilizes 1p trackers, which average between 8'6"-9'-0" in height. This height is when the trackers are at maximum tilt, which is a short duration in the morning when the sun first rises and at night when the sun sets. Throughout the day, the trackers will rotate to flatter positioning, decreasing their height. In addition, when the sun sets, the trackers will stow in a tabletop position, reducing their height to the shortest position allowed.

This site is also burdened by high-voltage transmission lines spanning the facility's southern portion. These transmission lines and structures have been a permanent part of the character of this area for decades. Solar panels and racking will have far less visual detriment than the ~100' tall transmission towers.

Comment 2: Concern regarding the sound from construction.

Response 2: While there will be an increase in sound during the construction of this project, the duration will be short-lived. We anticipate construction to take one year from the start; however, most of the work will be completed in four to six months. During this period, the Contractor will either be augering or pile-driving posts for the racking. The hours of operation for construction will be limited to what the Town approves. When construction is



150 John Vertente Blvd. | New Bedford, MA 02745

| 508-995-0192 x13 | M. 508-328-7877 | F. 508-207-1147 |

completed, this facility will become a silent neighbor, and no noise will be produced beyond the fence limits of the project. In addition, this site will be visited two or three times per year for regular maintenance and groundskeeping. There will be negligible traffic produced for the operations of this facility.

Comment 3: Concern regarding the impact to property values.

Response 3: In order to research and understand the impact on property values, TJA hired CohnReznick to perform an impact study on this project. An overall Property Value Solar Impact Report and a site-specific addendum to the Property Value Report can be found in Exhibit A and Exhibit B, respectively. In summary, the report draws the following conclusions:

Based upon the examination, research, and analyses of the existing solar farm uses, the surrounding areas, and an extensive market database, we have concluded that **no consistent negative impact has occurred to adjacent property values that could be attributed to proximity to the adjacent solar farm**, with regard to unit sale prices or other influential market indicators. Additionally, in our workfile we have retained analyses of additional existing solar farms, each with their own set of matched control sales, which had consistent results, indicating no consistent and measurable impact on adjacent property values. This conclusion has been confirmed by numerous county assessors who have also investigated this use's potential impact on property values.

The Project is located in a stable area that is predominantly agricultural in nature with some residential homesteads. The population density for the local area is 141.95 persons per square mile which reflects a rural environment. Local development has not been robust over the past 15 years, and the immediate land parcels have a future land use designation of agricultural. Local land and residential home prices have remained stable over the past five years and are anticipated to align in the future with macroeconomic changes. Overall, the proposed Project is considered a locally compatible use.

Comment 4: Request for trees along the southern portion of the project.

Response 4: We can accommodate this request. We will add tree plantings along the entire southern border of our project.

Comment 5: Concern regarding the decommissioning of the facility.

Response 5: Per the Town of Riga Local Law #2 of 2017, Section (6), all Solar Energy Systems must submit a decommissioning plan and a form of security to ensure the facility



150 John Vertente Blvd. | New Bedford, MA 02745

| 508-995-0192 x13 | M. 508-328-7877 | F. 508-207-1147 |

can be decommissioned if the Applicant abandons the project or becomes insolvent. As part of our December 14th, 2022 submission, we included a decommissioning plan which is under review by both the Town and the Town Engineer.

In addition to the requirements from the Town of Riga, we have a requirement in our Lease for a Decommissioning Plan and security with the Landowner, should the Town not require it.

Comment 6: Concern regarding EMFs from the facility and battery storage.

Response 6: No battery storage is being proposed with this project, and therefore there is no concern about battery storage hazards.

Per NC State University's "Health and Safety Impacts of Solar Photovoltaics," dated May 2017 (included in Exhibit C), solar panels do not emit EMFs. The only equipment that emits EMFs on the project site is the inverters and MV Equipment, which are all centrally located within the system, placing them at the furthest point from nearby residences. EMFs' impact on a pacemaker or other implanted devices is a common concern. Per the NC State Report, the EMF level at the facility's fence is 1/1000th of the level manufacturers test for interference. Moving closer to the property line and beyond, the EMFs continue dissipating to non-detectable levels relative to existing background levels. It should be noted that the existence of a high-voltage transmission line likely already produces EMF's for the area and the addition of the solar facility would be negligible.

Comment 7: Concern that this project will be precedent-setting and invite more solar projects to the Town.

Response 7: Each solar project submitted to the Town is unique and will require a case-by-case study and review by both the Planning and Town Board. The approval of the Mumford Solar Project does not set a precedent for the approval of other solar projects since the Town has a solar ordinance in place.

In addition, the substations and distribution lines have limited capacity with how many projects they can interconnect. The substation that services the project site also services several other towns within Monroe and Livingston County. There is not unlimited capacity on this infrastructure. This project has already undergone a utility study to demonstrate that it can adequately be interconnected, which likely limits the ability for another project to be proposed behind it on this same line.

Comment 8: Concern about the system size expanding.



150 John Vertente Blvd. | New Bedford, MA 02745

| 508-995-0192 x13 | M. 508-328-7877 | F. 508-207-1147 |

Response 8: Per the New York State Public Service Commission's Standardized Interconnection Requirements, dated December 2019, distributed generation projects cannot exceed 5 MW-ac on a single parcel. We submitted our application to National Grid for a 5MW-ac project and cannot increase the system size.

If the PSC changed the requirements and allowed larger system sizes, this project would need to submit an additional application and request to increase the system size to the Town of Riga. This would also require an area variance since the larger system size would exceed the maximum lot coverage in the solar ordinance. An additional submission would also be necessary to National Grid since a larger system size was being proposed on their distribution lines, which is likely to be denied due to space constraints on their equipment.

Conclusion: We are excited about the prospect of this project. The Mumford Solar Farm will employ dozens of people and inject hundreds of thousands of dollars into the local economy through the facility's construction, operation and maintenance and a Host Community Agreement. In addition, this facility will provide discounted electricity, along with electrical infrastructure upgrades paid for entirely by the developer. The solar farm will significantly increase tax revenue, all while resulting in no additional burden on the public school system or Town-owned infrastructure.

Again, I appreciate your thoughtful consideration of this project and would ask that the Town Board approve the Mumford Solar Farm Overlay District. If you have any questions about the project, please do not hesitate to contact me.

Sincerely,

Michael Frateschi, P.E.

President

TJA Clean Energy, LLC

(315) 558-2344

mfrateschi@tja.energy

List of Exhibits

Exhibit A – Property Value Solar Impact Report

Exhibit B – Site-Specific Addendum Report

Exhibit C – Health and Safety Impacts of Solar Photovoltaics White Paper



150 John Vertente Blvd. | New Bedford, MA 02745

| 508-995-0192 x13 | M. 508-328-7877 | F. 508-207-1147 |

Exhibit A

Property Value Solar Impact Report



150 John Vertente Blvd. | New Bedford, MA 02745

| 508-995-0192 x13 | M. 508-328-7877 | F. 508-207-1147 |

Exhibit B

Site Specific Addendum Report



150 John Vertente Blvd. | New Bedford, MA 02745

| 508-995-0192 x13 | M. 508-328-7877 | F. 508-207-1147 |

Exhibit C

Health and Safety Impacts of Solar Photovoltaic White Paper