

Appendix B

Written Comments on the DEIS

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VIA E-MAIL

July 9, 2025

Jim Taravella, PE
RIC Development, LLC
17 State Stret, Suite 2320
New York, NY 10004

RE: TOWN BOARD COMMENTS ON DEIS FOR EDEN SOLAR 2394 WEST CHURCH STREET

Dear Mr. Taravella:

As you know, our office serves as special counsel to the Town of Eden as relates to the review of the proposed Eden Solar and Eden Solar II Solar Projects. The Town of Eden is in receipt of RIC's April 2025 Draft Environmental Impact Statements (DEIS) for the above stated projects. Attached hereto is a copy of the meeting minutes from the June 11, 2025 public hearing on the DEIS. No additional comments were received from the public as regards either project. Please find below the Town Board's comments on each DEIS:

Eden Solar DEIS:

1. Green Fencing is requested to address possible visual impacts.
2. Please submit an updated Landscaping plan to address possible visual impacts.
3. All landscaping must be maintained for the life of the project.
4. In order to mitigate any impacts to agricultural soils and the site's future use for agricultural purposes, any topsoil removed during construction must be kept onsite either for use elsewhere as part of the grading plan or for use during decommissioning.
5. Please describe the use of any agrivoltaics that will be used in addition to planting of a pollinator friendly seed mix.
6. The Town has not yet entered into a PILOT or Host Community Agreement with the Applicant, please revise the language on DEIS page 36 accordingly.

7. Please confirm that Good Neighbor Agreements have been obtained and, if not, what efforts have been made to secure said agreements.

Eden Solar II DEIS:

1. Green Fencing is requested to address possible visual impacts.
2. Please submit an updated Landscaping plan to address possible visual impacts.
3. All landscaping must be maintained for the life of the project.
4. In order to mitigate any impacts to agricultural soils and the site's future use for agricultural purposes, any topsoil removed during construction must be kept onsite either for use elsewhere as part of the grading plan or for use during decommissioning.
5. Please describe the use of any agrivoltaics that will be used in addition to planting of a pollinator friendly seed mix.
6. The Town has not yet entered into a PILOT or Host Community Agreement with the Applicant, please revise the language on DEIS page 36 accordingly.
7. Please confirm that Good Neighbor Agreements have been obtained and, if not, what efforts have been made to secure said agreements.
8. Please provide an update on the February 18, 2025 wetlands determination request to DEC.

Please let me know if you have any additional questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Bridget O'Toole", written in a cursive style.

Bridget O'Toole, Esq.

cc: Eden Town Board