Town of Franklin

355 East Central Street
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DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

DATE: **January 31, 2024**

TO: **Franklin Planning Board**

FROM: **Department of Planning and Community Development**

RE: **Upper Union St Solar**
Site Plan

The DPCD has reviewed the above referenced Site Plan Modification application for the Monday, February 5, 2024 Planning Board meeting and offers the following commentary:

General:

1. The site is on Upper Union Street, and located in the Industrial Zoning District.
2. The proposed project includes the construction solar panels, along with drainage.
3. The Applicant been issues a NOI with the Conservation Commission.

Comments from January 8th Meeting:

1. Add replanting of trees to decommissioning plan - Complete
2. Increase the inflation rate from 2.5% to 5% - Complete

Suggested Special Conditions:

1. The Applicant will provide a decommissioning surety bond, in an amount agreed by the Planning Board and shall be issued by a surety company acceptable to the Town of Franklin prior to the pre-construction meeting.
2. Applicant shall enter into a tax agreement re: personnel property taxes with the Town of Franklin prior to start of construction.

DESIGN ENGINEERS, INC.

Decommissioning Plan
for
Upper Union Street Solar Project
Franklin, Massachusetts 02038

Applicant:
VS Union Solar Project, LLC
24941 Dana Point Harbor
Dana Point, CA, 92629

Prepared by:
Atlantic Design Engineers, Inc.
P.O. Box 1051
Sandwich, Massachusetts 02563

Original: December 11, 2023
Revised: January 24, 2024

Atlantic Project No. 3328.00

I. FACILITY DESCRIPTION

This Decommissioning Plan has been prepared for the proposed solar photovoltaic facility to be constructed at Upper Union Street in Franklin, Massachusetts. This plan describes the process for decommissioning the facility in accordance with state requirements and the Town of Franklin's Site Plan review process. The facility will consist of a fenced in area of ±2.2-acres containing a solar array with 839 modules and accompanying equipment secured within a 7' high chain-link fence and accessed via a 20' wide locked swing gate off an access road from Upper Union Street.

The Facility will include the following site features which will require decommissioning at the end of the life of the project:

- An approximately 2.2-acre array of 839 photovoltaic (PV) modules and racking system within the chain-link fence;
- Piles supporting the PV modules and racking system;
- One (1) MIT-CAT-100 Transformer, two (2) SE120KUS Inverters, and all other electrical equipment cabinets;
- 7-foot chain-link security fence;
- Underground conduit and wires;
- A 20' wide locking chain link security access gate at the entrance to the array area;
- Two (2) 10' wide chain link access gate for access to stormwater facilities;

II. DECOMMISSIONING PLAN

The decommissioning of the facility will be a two-stage process consisting of Dismantling, Demolition and Disposal/Recycling followed by Site Restoration. The following is a description of each process.

Dismantlement, Demolition, and Disposal or Recycling

A significant portion of the components that comprise the facility will include recyclable or re-sealable components including copper, aluminum, galvanized steel, and the modules. Due to their re-sale monetary value, these components will be dismantled, disassembled, and recycled rather than being demolished and disposed of. A Salvage Estimate of materials or equipment of value has been included within the attached calculations. Salvage items, as listed in **Table A**, will be sold back to the manufacturer or to a recycling facility.

All electrical connections to the system will be disconnected and all connections will be tested locally to confirm that no electric current is running through them before proceeding. The facility will be dismantled following coordination with the utility company regarding timing and required procedures for disconnecting the facility from the utility distribution network. All electrical connections to the PV modules will be severed at each module, and the modules will then be removed from their framework by

cutting or dismantling the connections to the supports. Modules will be removed and sold to a purchaser or recycler. In the event of a total fracture of any modules, the interior materials are silicon-based and are not hazardous. Disposal of these materials at a landfill is permissible.

The PV mounting system framework will be dismantled and recycled. The foundation system will be removed and recycled if feasible. All other associated structures will be demolished and removed from the site for recycling or disposal. This will include the site fencing and gates, which will likely be reclaimed or recycled.

Concrete equipment slabs will be broken and removed to a depth of one foot below grade and clean concrete will be crushed and disposed of off-site or recycled (reused either on or off-site). The paved access road will remain in place. The gravel access road within the perimeter fence surrounding the PV modules will remain in place.

Aboveground utility poles owned by the project operator will be completely removed and disposed of off-site in accordance with utility best practices. Any overhead wires will be removed from the facility and will terminate at the utility-owned connections on Upper Union Street. The utility company will be responsible for dismantling the overhead wires and poles under its ownership. The decommissioning contractor will coordinate with the utility company personnel to facilitate the utility company's removal of any poles and overhead wires located on the site. Stormwater basins, swales and rip-rap areas will remain in place.

A final site walkthrough will be conducted to remove debris and/or trash generated during the decommissioning process. Any debris that may have been wind-blown to areas outside the immediate footprint of the facility being removed. Sanitary facilities will be provided on site for the workers performing the decommissioning of the facility.

Site Restoration

The ±3.68-acres disturbed during decommissioning will be re-graded to recreate a uniform slope similar in grade to conditions that existed prior to facility construction. All disturbed areas will be revegetated with seed or hydro-seed, using a fast-growing seed mix. The array area (±2.2-acres) will be replanted with native trees. The gravel access road within the perimeter fence, gravel access road outside the perimeter of the fence, paved apron, and stormwater basins/facilities/swales/rip rap areas will remain in place.

Permitting Requirements

Several approvals will be obtained prior to initiation of the decommissioning process. Permitting requirements will be determined at the time of decommissioning and updated based on current local, state, and federal regulations. The decommissioning process is anticipated to take approximately six to eight weeks and is intended to occur outside of the winter season. In accordance with the requirements of of the Town of Franklin Zoning Bylaws, the owner/operator shall notify the Site Plan Review Authority

(Planning Board) by certified mail of the proposed date of discontinued operations and the decommissioning will be completed no more than 150-days after the date of discontinued operation. Absent notice of a proposed date of decommissioning or written notice of extenuating circumstances, the solar photovoltaic installation shall be considered abandoned when is fails to operate for more than one year without the written consent of the Planning Board. Based upon current regulations, a building/demolition permit will be required from the Town of Franklin Building Department for the decommissioning of this site because a building/demolition permit must be obtained for any demolition or change to the use of a structure.

III. DECOMMISSIONING COST ESTIMATE

Atlantic has reviewed multiple solar decommissioning cost estimates in the preparation of this decommissioning plan. The estimated net present value of decommissioning cost for the proposed Upper Union Solar Project, including salvage is $52,657.00. **Table 1**, attached below shows an itemized estimate of decommissioning costs that have been taken into account within our estimate.

Assuming a 5.0% yearly inflation for the 20-year project life span and assuming salvage value, the proposed financial surety amount is **$139,715.00.**

TABLE 1
Upper Union Solar Project (ORIGINAL: 12-11-2023)
REVISED: 01-24-2024

System Information Summary	
Total System Module Count	**839**
Total System Inverter Count	**2**
Racking Orientation	**2 Up Vertical**
Linear Feet of Racking	**2932.91**
Estimated Aluminum per Foot of Racking (lbs)	**2**
Estimated Steel Per Foot of Racking (lbs)	**4.5**
Estimated Length of Interconnection to Street (feet)	**973**
Anticipated Project Lifestpan for Inflation Calcuation (years)	**20**
Ballasted System (Y/N)	**No**

Decommissioning Summary		
Estimated Business Days to Demolish (8 Man Crew - Rate of 350 modules, 2 Inverters & 500 Linear Feet of Racking/Day)		**4**
Estimated Total Number of 40 Yard Dumpsters (400 Modules/2INV/Miscellaneous Debris Per Container)		**3**
Dumpster Disposal Cost ($1,000 per Dumpster for 21-day Period)	**$**	**3,000.00**
Labor Cost - 8 Man Crew ($60/Hour)	**$**	**15,360.00**
Equipment Cost ($125/Hour)	**$**	**4,000.00**
Grading and Reseed (2.5% Labor & Equip Costs) & (10 lb/acre @ $50/lb)	**$**	**2,324.00**
Replant Native Tress (±426 Trees [4-5 ft tall] @ $100 a Tree Installed)	**$**	**42,600.00**
Total Current Day Decommissioning Estimate	**$**	**67,284.00**
Decommissioning Costs Using Lifespan with 5.0% Inflation	**$**	**178,525.00**

Salvage Value Summary			
Estimated Copper Salvage (lbs)		**3,892.00**	
Estimated Aluminum Salvage (lbs)		**5,865.82**	
Estimated Steel Salvage (lbs)		**13,198.10**	
Current Day Salvage Pricing for Copper ($/lb)	**$**	**2.85**	(Mid City Scrap - 12/23)
Current Salvage Pricing for Aluminum ($/lb)	**$**	**0.40**	(Mid City Scrap - 12/23)
Current Salvage Pricing for Steel ($/lb)	**$**	**0.09**	(Mid City Scrap - 12/23)
Estimated Copper Salvage Value	**$**	**11,092.20**	
Estimated Aluminum Salvage Value	**$**	**2,346.33**	
Estimated Steel Salvage Value	**$**	**1,187.83**	
Estimated Ballast Salvage (@ $12/Ton With Metal - 2019)	**$**	**-**	
Estimated Total Salvage Value	**$**	**14,627.00**	
Estimated Total Salvage Value Using Lifespan with 5.0% Inflation	**$**	**38,810.00**	

Estimated Future Decommissioning Cost Including Estimated Future Salvage Value	**$**	**139,715.00**

Atlantic
DESIGN ENGINEERS, INC.

January 8, 2024

Mr. Gregory Rondeau, Chairman
Franklin Planning Board
355 East Central Street
Franklin, MA 02038

RE: Response to BETA Site Plan Peer Review Comments, January 3, 2024
Upper Union Solar Project – Franklin, MA
ADE Job #3328.00

Dear Mr. Rondeau:

This response letter addresses the comments made in the BETA Site Plan Peer Review Letter dated January 3, 2024, for above-referenced project. Please note the peer review comments are *italicized*, and our responses follow in **bold** text.

To assist with the review, all the comments addressed in the prior submission will be discontinued. BETA's comments to Atlantic's December 13, 2023, Response Letter will be labeled BETA2.

Atlantic Design Engineers, Inc. responses to the comments from the January 03, 2024, Review Letter will be labeled ADE3.

GENERAL
ZONING

The Site is located within the industrial (I) Zoning District. The proposed use is a Large-Scale Ground- Mounted Solar Energy System, which is permitted within this district following Planning Board Site Plan Review.

SCHEDULE OF LOT, AREA, FRONTAGE, YARD, AND HEIGHT REQUIREMENTS (§185 ATTACHMENT 9)

As shown on the schedule on the Zoning table on Sheet 5 of 9, the Site meets the requirements for lot area, depth, frontage, building height, and impervious area coverage. The lot width does not conform, however as noted in the bylaws, any lot created prior to May 20, 1998, is exempt from the current definition. The design engineer has indicated that the lot was created in 1995 prior to the bylaw and is therefor grandfathered.

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PARKING, LOADING AND DRIVEWAY REQUIREMENTS (§185-21)

The project proposes to construct a 20' wide access driveway from Upper Union Street to the gate at the entrance to the array area. A hammerhead turn around will be provided in front of the gate. The driveway will have a 50' long paved apron at the entrance and be gravel the remainder of the way to the gate which will measure approximately 900'. The driveway will be located directly behind the existing residential lots on Ribero Drive and proceed east for approximately 600' until it turns northeast across the easement to the array. The driveway will follow an existing 20' wide right of way easement that extends from Upper Union Street to an existing gravel roadway in the easement.

The project does not propose a residential or nonresidential building; therefore, no parking is required. BETA anticipates that there is adequate space along at turnaround areas for maintenance vehicles to temporarily park without disrupting access.

P2. Around the perimeter of the array, the grade will range from 12-20%. BETA recommends that the applicant coordinate with the Fire Department to confirm that the perimeter access is acceptable.

ADE: The Deputy Fire Chief has indicated that he only requires access up to the break in panels in the middle of the array.

BETA: BETA will defer this to the Fire Chief. No further comments.

INDUSTRIAL DISTRICT PERFORMANCE CONTROLS (§185-22)

The project is located within an Industrial District and therefore must conform to these requirements. Given the nature of the project, BETA does not anticipate vibration, odor, or flashing related impacts.

EARTH REMOVAL REGULATIONS (§185-23)

The project includes significant disturbance which may result in earth removal greater than 15 cubic yards.

E1. Indicate approximate earth removal volume to determine compliance with this section.

ADE: The limited amount of excavation required for the project will allow the excavated material to remain and be re-used as fill on the site. No earth removal is anticipated.

BETA: BETA recommends that Construction Note 20 on Sheet 8 of 10 be expanded to note that no earth will be removed from the site.

ADE2: Construction Note 20 has been revised according to BETA Group's comment. See revised Site Plans dated 12/13/2023.

BETA2: Comment addressed. No further comments

SIDEWALKS (§185-28) AND CURBING (§185-29)

No sidewalks are proposed under this project. As a solar facility, pedestrian access to the Site is not required. The project proposes to provide a 50' long paved apron in the proposed driveway entrance. A cape cod berm is proposed on the northerly edge of the driveway. BETA will defer to the Planning Board whether vertical granite or precast concrete curbing should be provided at the entrance.

ADE: A Cape Cod berm along the northern edge of the paved apron at the entrance is sufficient to convey any stormwater from the paved area into the proposed catch basin and infiltration chamber. In addition, the plans have been clarified that this is a private driveway only, not a "roadway". The topic was discussed at the 12/4/23 Planning Board meeting. The Board agreed a Cape Cod berm was sufficient and curbing was not required.

BETA: BETA will defer to the Planning Board on this matter.

STORMWATER MANAGEMENT

The stormwater management design proposes two detention basins to capture stormwater runoff from the arrays and the gravel roadway. A catch basin is proposed at the entrance which will discharge to a subsurface infiltration trench beneath the driveway. Outfalls from this basin are proposed to convey captured stormwater runoff to the east. The remainder of the Site will generally follow pre-development flow patterns with no stormwater BMPs proposed.

G1. The grading for the embankment that forms the detention basin at the northwest corner of the parcel is incorrect. The top width is shown incorrectly. Since the crest elevation is

405.5 with 3h:1v side slopes, the distance between the elevation 405 contours should be 9'. It is depicted on the plans as 4'.

ADE: The basin berm has been regraded on the revised site plans and the basin detail has been revised to clarify the crest elevation.

BETA: The grading for the crest width has been corrected, however, the slope of the embankment at the down gradient edge of the basin has been increased to 2.5h:1v. Where this basin has been converted to an infiltration basin, BETA recommends that the slope be reduced to 3h:1v in accordance with Volume 2, Chapter 2 of the handbook.

ADE2: The basin berm has been regraded on the revised site plans and the basin detail has been revised to clarify the crest elevation.

BETA2: The basin detail and grading has been corrected. BETA recommends that a piece of granite or precast concrete be added to form the crest of the emergency spillway to prevent flow through the rip rap.

ADE3: Concrete curbs have been added. See Revised Site Plans dated January 8, 2024.

G2. *The grading for the embankment that forms the detention basin at the north of the entrance driveway 450' from Upper Union Street is also incorrect. The top width is shown incorrectly. Since the crest elevation is 459.5 with 3h:1v side slopes, the distance between the elevation 459 contours should be 9'. It is depicted on the plans as 5'.*

ADE: The basin berm has been regraded on the revised site plans and the basin detail has been revised to clarify the crest elevation.

BETA2: The grading has been corrected, no further comments

SW1. *The discharge point from the northeast detention basin will change the nature of the flow onto the abutting parcel. Specifically, because of the proximity to the property line, the flow will not have the opportunity to replicate natural flow patterns. BETA recommends that the outfall be setback a sufficient distance for a natural flow pattern to develop or obtain an easement.*

ADE: The basin has been converted to an infiltration basin, based upon the favorable soil and groundwater conditions found in the test pits. The outlet pipe has

been eliminated from the design. Therefore any flow off the site will occur only under emergency overflow conditions. The toe of the basin has been shifted 20-feet away from the property line. A 50-foot long level spreader is provided at the base of the emergency spillway to replicate natural flow patterns in the unlikely event of an emergency overflow.

BETA: As noted, the basin will not discharge on to the abutting parcel except during a rainfall event greater than a 100-year frequency rainfall. Therefore, the issues with the discharge onto the abutting parcel are no longer an issue. However, because the basin serves both purposes of recharge and peak flow rate attenuation, a mounding analysis is required (Chapter 3, Volume 1).

ADE2: Atlantic has completed a mounding analysis. Please refer to Stormwater Addendum #2 dated 12/13/2023. Per an email from Gary James of BETA Group Inc. on 12/07/2023 (see attached), a groundwater mounding analysis is not required for the Cul-tec subsurface infiltration system.

BETA2: Mounding analysis provided. Results indicate no rise above floor of basin. No further comments.

STORMWATER MANAGEMENT REGULATIONS (CHAPTER 153)

The project proposes to disturb land in excess of one acre within the Town of Franklin. It is therefore subject to the Stormwater Management Regulations. The project is also required to comply with the Town of Franklin Best Development Practices Guidebook (BDPG). Compliance with these regulations is outlined below and throughout the following sections.

SUBDIVISION REGULATIONS - STORMWATER MANAGEMENT REGULATIONS (§300-11)

Additional requirements for stormwater management are outlined in §300-11 of the Town of Franklin Subdivision Regulations.

MASSDEP STORMWATER STANDARDS

The project is subject to the Massachusetts Stormwater Standards as outlined by MassDEP. Compliance with these standards is outlined below:

NO UNTREATED STORMWATER (STANDARD NUMBER 1): No new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth. The project proposes two detention basins.

SW4. The paved driveway section which flows toward Upper Union Street must be treated in accordance with the standards. Provide calculations that document compliance with the standards.

ADE: Refer to the Water Quality, Recharge and TSS removal calculations for the 1,137 SF asphalt area in the Miscellaneous Calculations section of the Drainage Addendum.

BETA: Since the infiltration rate qualifies as a higher rate, pretreatment must be 44% and should be documented.

ADE2: Atlantic has added a deep sump manhole along with the previously proposed deep sump catch basin, which achieves the pretreatment requirement. Please refer to revised Site Plans dated 12/13/2023 and Stormwater Addendum #2 dated 12/13/2023.

BETA2: In accordance with the stormwater standards, a deep sump manhole is not considered a treatment methodology. BETA recommends that the applicant consider implementing an Isolator row filter fabric wrap around the inlet row. Comment remains.

ADE3: Isolator/Separator row has been added to proposed Cul-tec subsurface infiltration system. See Revised Site Plans dated January 8, 2024.

SW5. Construction details for the proposed infiltration trench at the entrance should also be included on the plans including design elevations and layout dimensions.

BETA: There are no design elevations provided for the proposed Cul-tec system at the entrance. In addition, it appears that the system will be less than 4' above ESHGW and a mounding analysis will be required.

ADE2: Design elevations for the rims, pipe inverts, and stone inverts have been provided (Sheet 6 of the revised Site Plans). Per an email from Gary James of BETA Group Inc. on 12/07/2023 (see attached), a groundwater mounding analysis is not required for the Cul-tec subsurface infiltration system.

BETA2: Details for the trench have been provided. No further comments. (See SW4 above)

SW6. The runoff from the proposed equipment pad should be treated in accordance with the standards. Provide calculations which document that the treatment and pretreatment requirements for this impervious surface is being met.

ADE: Refer to the Water Quality and Recharge calculations for the 640 SF of equipment pad in the Miscellaneous Calculations section of the Stormwater Addendum. The equipment pad is subject to foot traffic only so TSS removal is not required.

BETA: In accordance with Volume 1, Chapter 1 of the handbook, the equipment pad is subject to the Maximum Extent Possible. The infiltration basin at the northwest corner of the site will certainly provide the treatment and recharge required for this small area. Document TSS Removal based upon all the measures provided.

ADE2: Please refer to the Stormwater Addendum #2 for the completed TSS calculation for the equipment pad.

BETA2: TSS Calculation sheet provided. No Further comments.

POST-DEVELOPMENT PEAK DISCHARGE RATES (STANDARD NUMBER 2): Stormwater management systems must be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates. The project proposes changes to site hydrology and ground cover which will impact stormwater flow to the analyzed design points. Stormwater runoff will be mitigated via the 2 proposed detention basins. Calculations indicate a decrease in peak discharge rates.

SW8. In watershed 1S, the Tc for the proposed conditions is incorrectly reported greater than existing conditions. The slope on the final leg of the calculation for the existing conditions analysis is incorrect.

ADE: The Tc calculations for watershed 1S have been revised in the Stormwater Addendum.

BETA: BETA recommends that the designer review the Tc calculations since the Tc for proposed is greater than existing. In addition, the hydrograph should be routed through the cul-tec trench.

ADE2: Pre-development Time of Concentration (Tc) for Subcatchment 1S was increased to 12.2 minutes to match Post-development conditions per an email from Gary James of BETA Group Inc. on 12/07/2023 (see attached). Please refer to Stormwater Addendum #2 dated 12/13/2023.

BETA2: Calculations corrected. No further comments.

RECHARGE TO GROUNDWATER (STANDARD NUMBER 3): Loss of annual recharge to groundwater should be minimized through the use of infiltration measures to maximum extent practicable. NRCS soil maps indicate the soils at the site are of Charlton-Hollis -Rock outcrop complex, (fine sandy loam,) and Woodbridge fine sandy loam. The Charlton-Hollis-Outcrop complex is rated in Hydrologic Soil Group (HSG) A (high Infiltration potential), while the Woodbridge is rated HSG-C (low infiltration potential).

TOTAL SUSPENDED SOLIDS (STANDARD NUMBER 4): For new development, stormwater management systems must be designed to remove 80% (90% per Town Bylaw) of the annual load of Total Suspended Solids (TSS). The project is required to treat the 1.0-inch water quality volume per Town Bylaws.

SW16. For a new development Site, meet one of the following criteria (§153-16.B(1))

a. *Retain the volume of runoff equivalent to, or greater than, 1.0 inch multiplied by the total post-construction impervious surface area on the Site; and/or*

b. *Remove 90% of the average annual post-construction load of TSS and 60% of the average annual load of total phosphorus.*

ADE: Calculations are provided in the Miscellaneous Calculations section of the Stormwater Addendum that show that greater than 1" times the impervious areas on the site is being retained/infiltrated on the site.

BETA: Calculated water quality volumes do not include runoff from the roof areas on the adjacent residential lots which are tributary to the infiltration measures which should be included unless they qualify for LID Credits. It should also be noted that because of the higher infiltration rate, the required pretreatment for all the impervious surface runoff should be 44% and documented accordingly.

ADE2: Atlantic has incorporated the roof runoff from the adjacent residential lots in the water quality calculation for Subcatchment 1S. Additionally, Atlantic has added a deep sump manhole along with the previously proposed deep sump catch basin, which achieves the pretreatment requirement. Please refer to revised Site Plans dated 12/13/2023 and Stormwater Addendum #2 dated 12/13/2023.

BETA2: Calculations provided. No further comments. (See SW4 above).

HIGHER POTENTIAL POLLUTANT LOADS (STANDARD NUMBER 5): Stormwater discharges from Land Uses with Higher Potential Pollutant Loads (LUHPPLs) require the use of specific stormwater management BMPs. The project is not considered a LUHPPL – not applicable.

CRITICAL AREAS (STANDARD NUMBER 6): Stormwater discharges to critical areas must utilize certain stormwater management BMPs approved for critical areas. The project is not in a critical area as defined by the standards– not applicable.

REDEVELOPMENT (STANDARD NUMBER 7): Redevelopment of previously developed sites must meet the Stormwater Management Standards to the maximum extent practicable. The project is not considered a redevelopment– not applicable.

EROSION AND SEDIMENT CONTROLS (STANDARD NUMBER 8): Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities. As the project proposes to disturb greater than one acre of land, it will be required to file a Notice of Intent with EPA and develop a Stormwater Pollution Prevention Plan (SWPPP). Erosion control measures are depicted on the plans include compost sock, silt fence, hay bales, inlet protection, stabilized construction entrance, dust control, erosion control blankets, filter bags for dewatering, and stockpile controls. A construction sequencing plan is included on Sheet C-608.

SW23. The applicant is reminded that a Stormwater permit from the Franklin DPW is required based upon the size of the disturbance.

ADE: The Stormwater Permit request was included in the original Planning Board submittal.

OPERATIONS/MAINTENANCE PLAN (STANDARD NUMBER 9): A Long-Term Operation and Maintenance Plan shall be developed and implemented to ensure that stormwater management systems function as designed. A Stormwater Operation and Maintenance Manual was provided with the Stormwater Management Report.

ILLICIT DISCHARGES (STANDARD NUMBER 10): All illicit discharges to the stormwater management system are prohibited. An Illicit Discharge Compliance Statement was provided with the submission.

WETLANDS PROTECTION

The Project proposes work within Areas Subject to Protection and Jurisdiction of the Franklin Conservation Commission, including the 100-foot Buffer Zones to a vegetated wetland. Work within these areas includes portions of the solar array, fencing, gravel access drives, grading, tree clearing, and equipment pad. Therefore, the Applicant is required to submit an NOI to the Town of Franklin Conservation Commission and must obtain an Order of Conditions to complete the proposed work.

> **ADE: Acknowledged. A Notice of Intent was filed concurrently with the Conservation Commission. Public hearings are underway.**

Please call us at (508) 888-9282 if you should have any questions.

Sincerely,

ATLANTIC DESIGN ENGINEERS, INC.

Richard J. Tabaczynski, P.E.
Vice President

CC: VS Union Solar Smart, LLC