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PLANNING BOARD
GRAFTON, MA

EXHIBIT 6

Town of Grafton
Planning Board
Grafton Memorial Municipal Center
30 Providence Road
Grafton, MA 01519

**Subject: Response to Completeness Review by Town Planner on Application for Special Permit/Site Plan Approval and Scenic Road Permit
Photovoltaic Solar Energy Generation and Storage Facility
155 George Hill Road
Grafton, MA**

Dear Planning Board Members:

In response to Mr. Joseph Laydon's April 30, 2019 Memo, Industria offers responses to the original comments (shown in italics)

Comments on Scenic Road Application:

Staff reviewed the Application form, submitted photos of the proposed entrance, and the Plan set entitled Definitive Site Plan, "155 George Hill Road Solar Facility" dated April 24, 2019 and prepared by Summit Engineering and Survey. Comments on the materials are as follows:

1. *Description of Work is Incomplete: The Application describes the proposed work as "creation of a 25-foot entrance to a proposed solar array on back side (800 feet from George Hill Road) of property. The Application continues to state the linear extent of work is a 25-foot opening in the wall and that one 16" maple will be removed. Mitigating activities identified are the repair of the stone wall and planting of additional maple trees along the road.*

The Application is deficient from describing fully the amount of work. The existing opening in George Hill Road is not included in the request or description of work. The Plans indicate the existing opening will be widened for use as a construction entrance and that additional portions of the stone wall will be impacted, and one additional tree will need to be removed (See Photo #1). The Application does not include detail on the proposed opening and what will happen with the displaced stones. While the wall is described as in disrepair, there are numerous stones, many of which are large (See Photo #2). Furthermore, there is no landscaping plan indicating where the maple trees will be planted or how many.

Industria Response: See Attached Revised Plans specific to the Scenic Road Application issues. The location of the opening was selected to minimize impact to the farmed field by having the access road to the proposed project as far north on the lot as possible. The field will continue to be farmed after the project is complete. We also wanted to avoid the existing drainage swale on the east site of George Hill Road and the culvert beneath George Hill Road. Field Stones removed from the proposed opening will be used to close the existing smaller opening located approximately 75 to 80 feet south of the proposed

opening. Any excess stones will be used to neaten up the existing wall and will be identified at the time of opening the new access and closing the old access. The size of the stones is manageable with the anticipated equipment to be onsite during construction. The replacement trees will be placed in the area of the old opening. We propose to install three 3-inch diameter in the old opening.

2. *Two Access Points: Information needs to be submitted that supports why two breaks in the stone wall are needed. The proposed access opening could provide access for the solar facility and for any maintenance of the lower field.*

Industria Response: Agreed, as noted above we are planning to close the existing entrance. The field can be accessed with new driveway.

3. *Information to Locate Proposal: Information was not submitted that identifies the location of the scenic road application. Recommend referencing distance from Utility Pole and adjacent property addresses.*

Industria Response: We paced 2 wooden survey stakes to note the proposed location on George Hill Road. The entrance is Between 75 and 100 feet south of the Northwest Property Corner. The location is further described as being across the street from Utility Pole #8 on George Hill Road.

Due to the deficient information submitted pursuant to Scenic Roads Regulations - Article 24, Section 5.1 Staff has deemed the Scenic Roads application incomplete.

Industria Response: We hope the additional information provided herein and the Scenic Road Plan Set is sufficient.

Comments on Special Permit/Site Plan Application:

Staff reviewed the Application form, submitted narrative dated April 24, 2019, and the Plan set entitled Definitive Site Plan, "155 George Hill Road Solar Facility" dated April 24, 2019 and prepared by Summit Engineering and Survey. Comments on the materials are as follows:

1. *Tree Clearing: Existing and Proposed tree line is unclear. This is especially pronounced at the access drive, around the drainage area and adjacent to the northern property line.*

Industria Response: Drawings were updated to more clearly show existing and proposed tree lines

2. *Access Drive: For past approvals, grades in excess of 8% were required by the Fire Department to be paved. Obtain documentation indicating support from Fire Department if gravel is to be used on steeper grades than 8%.*

Industria Response: We will work with Fire Department. We prefer to not pave the road as the expense is excessive for a lightly used access road to a solar array with minimal personnel. Furthermore a stated goal of the Stormwater Management is the reduction of impervious surfaces.

3. *Reuse of Stone walls: There are sections of stonewalls that will be disturbed during the driveway access construction activities. Many of these are large, how will these stones be reused?*

Industria Response: Field Stones removed from the proposed opening will be used to close the existing smaller opening located approximately 75 to 80 feet south of the proposed opening. Any excess stones will be used to neaten up the existing wall and will be identified at the time of opening the new access and closing the old access. The size of the stones is manageable with the anticipated equipment to be onsite during construction.

4. *Proposed Access Curb Cut: Observing the proposed curb cut location at the site, the stakes marking the width of the opening are close to the existing culvert that flows under George Hill Road. As shown in Photo #3 at the end of this memo, the culvert drains a swale off the side of the road. The new driveway will be very close to*

this culvert. Furthermore, on the backside of the stone wall in this area is the proposed detention basin. The overflow for the basin will drain into this culvert. The ability of this culvert to handle the added stormwater flow needs to be examined.

Industria Response: See Attached Revised Plans specific to the Scenic Road Application issues. The location of the opening was selected to minimize impact to the farmed field by having the access road to the proposed project as far north on the lot as possible. The field will continue to be farmed after the project is complete. We also wanted to avoid the existing drainage swale on the east site of George Hill Road and the culvert beneath George Hill Road. Site fence and Straw wattles were added to the plans to protect the swale and culvert during construction. Once stabilized, these controls will be removed. The overspill and drain for the small detention basins were moved to discharge to the field instead of the Street. The drainage calculations and system design has been modeled to mimic existing flow conditions leaving the property. As shown, peak flow rates experience exiting the property are the same or lower than the existing condition.

5. *Culvert Under Proposed Driveway: It was observed that under existing conditions, water flowing from the north travels under a culvert that runs under George Hill Road to the other side. The Plans indicate a new culvert will be placed under the proposed driveway. Information needs to be presented, including more detailed plans of the opening to identify how the added culvert will impact the existing culvert.*

Industria Response: The culvert has been eliminated; it is unnecessary. The swale and culvert north of the driveway on George Hill road will not be impacted by the proposed driveway opening.

6. *Drainage Swales Along Driveway: With the series of culverts under the access drive leading to the solar field, there is lack of details on whether there is a swale on the northern side of the access road.*

Industria Response: The drawings have been amended to add more detail. The culverts are intended to maintain flow across the property due to the construction of the access driveway.

7. *Culverts Under Access Road: No invert and outfall elevations are shown on how these will transport water from one side of the road to the other.*

Industria Response: The drawings have been amended to add more detail. Invert elevations are shown on the profile sheets.

8. *Proposed Grades: The Plan does not propose new grades for the areas of the solar fields. Proposed grade lines are only shown around the road and detention basins. No proposed grades are associated with "proposed swale" lines leading to detention basins. Furthermore, the proposed grades around Basins A and C do not tie into existing grades clearly.*

Industria Response: The drawings have been amended to add more detail and be clearer. There are no substantial grade changes in the solar field. The applicant will clear and grub the wooded areas and re-grade the disturbed surfaces. Contouring to Basins A and C have been clarified. Please note that the basin grading is in 1 foot contours for detail information while the existing contours are 2 foot intervals.

9. *Emergency Turnaround Lane: The mid-field emergency access drive is approximately 300 feet in length. There is no turnaround which necessitates a vehicle to reverse up the access drive. In addition, the plan indicates the access drive will follow existing topography which will introduce a cross slope to the access drive. The Access Drive should be modified to indicate proper grading and include a turnaround.*

Industria Response: The purpose for the gravel road is to permit service equipment to access the transformer pad. The entire facility has been enclosed with security fencing to restrict access to the site only to authorized personnel. We plan to meet with the Fire Department next week to discuss emergency access to the site.

Grading has been revised to show the gravel driveway.

10. *Lack of Fire Access: There is a significant area that is not accessible to Fire Vehicles.*

Industria Response: Following construction, we typically only access and work on the concrete pads. Work in the array area (i.e., the rows of solar modules) is rare and only for inspectional services. While accidents and issues on solar projects are rare, if they were to occur it would be at the equipment located on concrete pads which are accessible. We will confirm this the Fire Department.

11. *Detention Basin Access: Provide information on how the two southern detention basins will be accessed for maintenance.*

Industria Response: Detention basin maintenance will be performed with typical construction equipment (skid steer, backhoe, etc.) all of which will be able to access the basins via the rows of solar. We don't typically provide formal access roads to the basins as they are infrequently accessed. In the event of an emergency or maintenance issues, there is readily available equipment that can easily access the area.

12. *Bain Operation and Maintenance Plan: The O&M Plan does not cover tasks such as seasonal mowing or removal of woody vegetation.*

Industria Response: The O&M Plan will be modified to include seasonal mowing and removal of woody vegetation

13. *Phasing Report: The Phasing report does not indicate where stockpiles of trees and stumps will be located. Will trees be chipped on site or will a logging truck carry out logs. Will there be mulch piles from grindings and how will they be protected.*

Industria Response: The Phasing of the clearing will proceed as follows:

- Mobilize to site, temporarily use existing opening in stone wall to access field.
- Install erosion controls as noted on plan set
- Open proposed driveway, excavate and install antitracking pad and gravel access road across open field to edge of woods
- Mobilize clearing equipment/begin clearing in access road from field to top of hill
- Proceed in a counterclockwise direction on perimeter of limits of work
- Initially, tree chipping/processing/loading will occur in open field off of George Hill.
- Once western and southern perimeters are cleared, temporary detention basins and swales to basins will be excavated as clearing continues around perimeter to southern extent of limits of work
- Continue clearing from south to north. The set up and location of processing of trees and stumps will likely move to top of hill once access road is complete. Regardless of location of processing, the intent to ensure erosion controls are in place, effective and monitored
- Monitor basins, swales and amend with interim/temporary erosion controls as necessary. Once southern 1/3 of site cleared, begin layout of trenching and pile driving.

14. *Stormwater Report: Provide statement that the stormwater report was prepared to meet the requirements of the Town's Stormwater Bylaw. The report, in Appendix 4 states the report was prepared to comply with the Mass DEP Stormwater Policy Handbook. This project requires Conservation Approval under the Stormwater Bylaw. Verification that the report was prepared to meet the Town's bylaw and regulations is requested.*

Industria Response: The stormwater report was prepared to meet the requirements of the Town's Stormwater Bylaw.

Should you have any questions or require additional information or further explanation of the project, please contact me by telephone at (774) 270-0834, or by email at mlotti@industriaeng.com.

Very truly yours,
INDUSTRIA ENGINEERING, INC.



Michael S. Lotti, LSP
Vice President

Cc: James and Nancy Padula (Land Owner), 7 Browns Road, Grafton MA 01519
Tyler Krupa, National Grid (System Owner once constructed), 40 Sylvan Road, Waltham, MA 02451

Enclosure
Revised Plan Set - 16 Pages