# Site Design Associates
## Consulting Engineering and Land Planning

June 13, 2022

Kate Burch
Assistant Planner
Town of Topsham
Via email

**RE: Topsham Lewiston Solar Project**
**Review of Responses to Comments**

Dear Kate;

Per your request we have undertaken a review of responses to our June 1 comments regarding the plans and documentation submitted to the town in support of a site plan application for a large scale solar energy conversion system located at 571 Lewiston Road/Route 196. Based upon our review, we offer the following comments for your, the planning board's, and the applicant's consideration:

**A. General**

1) Addressed.

2) Addressed by the applicant and your suggested COA.

3) You may want to verify with the fire chief that the Emergency Action Plan and Vegetation Management Plan have been reviewed and are acceptable. The applicant indicated these documents were submitted to the chief but they have not heard from him.

4) Associated with stormwater I and M plan; Response indicated this will be addressed.

5) Associated with stormwater I and M plan; Response indicates this will be addressed.

6) Associated with stormwater I and M plan; Response indicates this will be addressed.

7) Addressed.

8) The letter provided in the financial assurances section does not meet state or local ordinance requirements for the decommissioning surety required. We recommend that a condition of approval be added: Per section 225-60.19.G.(3)(a) of the

Topsham code, prior to construction the applicant will provide an assurance for the decommissioning cost in a form acceptable to the town.

9) Section 225-60.19.G.(3)(b) of the land use code requires the decommissioning surety to be approved by the planning board. The amount of the surety proposed, $88,410, seems relatively low for the scope of the decommissioning when compared with the costs for recent solar projects prorated based on size. This section of the code also permits the town to hire at the applicant's expense a qualified professional to review the engineer's estimate, which may be advisable.

   The applicant responded *the decommissioning plan, including the estimated cost of decommissioning, has been prepared in accordance with MDEP requirements and solar decommissioning guidance provided by the MDEP. Decommissioning costs were estimated using information published by the New York State Energy Research and Development Authority and adjusted for Maine labor wages and site-specific factors.*

   Again, when comparing this cost with previous solar projects in town, the estimate appears to be low. We recommend that the town hire at the applicant's expense a qualified professional to review the engineer's estimate.

10) Previous comments from the town had requested a traffic control plan. The applicant responded that they will develop a traffic control plan as required by the MDOT permit. Typically, the MDOT would not require a traffic control plan for a project of this nature, and we suggested that the applicant provide a plan as requested even if MDOT does not request one.

    The applicant responded because they provided a turning analysis, a traffic control plan is not required. They are actually two separate items. Given the 50 mph speed limit and the nature of the vehicles that will access the site, a traffic control plan should be provided, including signage types and locations.

11) Addressed.

**B. Drawings** (The applicant indicated all comments will be addressed)

1) Additional existing contour labels should be shown on all drawings.

2) Access drive construction information is located on several drawings. We suggest that information relative to the access drive construction be consolidated on drawings C-1.4 and C-1.5, and include;

   a. Spot grades at Route 196 and at the ends of the turnarounds
   b. Turnaround radii dimensions
   c. Resolve the conflicts in the culvert location between plan and profile views
   d. Culvert material, size, and inverts

e. Plan view of culvert inlet and outlet protection
f. Definition of cross slopes at various locations along the access drive using spot grades or arrows, per the drive construction detail shown on drawing C-2.0.

3) A typical section of the culvert with the natural bottom should be provided.

4) The typical section for the staging area shown on drawing C-2.1 calls for construction fabric over the existing ground prior to placement of gravel. Will organics be removed prior to the placement of the fabric? The detail also calls for "fabric to be used if gravel is to be used". It appears gravel is specified, so is this note necessary?

5) Details for grass swales, level spreaders, slope protection and a stone swale are provided on drawing C-2.1. The locations of these practices should be shown on the plans.

6) Drawing C-2.3, Perimeter Controls, should consolidate the perimeter controls shown on the other drawings.

If you or the applicant have any questions or comments, please do not hesitate to contact me.

Sincerely,
Site Design Associates

Tom Saucier, P.E.
President