July 20, 2023

712 Brook Street, Suite 103, Rocky Hill, CT 06067
Tel: 860.513.1473

Ms. Liz Burdick
Director, Department of Land Use & Development
Town of Montville
310 Norwich-New London Turnpike
Montville, CT 06382

Re: Response to Site Plan Application Comments
Montville Landfill Solar Project
669 Oakdale Road, Montville, CT 06353

Dear Ms. Burdick:

Weston & Sampson Engineers, Inc. (Weston & Sampson), on behalf of VCP Montville LF, LLC (Verogy), is submitting this letter in response to comments received from the Town of Montville Land Use Department on July 14, 2023 regarding a Site Plan Application (Application No. 23SITE8) previously submitted for the above-mentioned project. The review comments from the Town are listed in bold below followed by our response in italics. Please note the revised drawing set, which is included as an attachment to this letter, also addresses comments received from CLA Engineers, Inc. on June 22, 2023.

1. Revise Cover Sheet to show "Proposed Solar PV Development, Town of Montville Landfill, 669 Route 163, Oakdale, CT.
The drawing set has been revised accordingly.

2. Revise Cover sheet to show address of Land Owner as "310" Norwich-New London Tpke.
The drawing set has been revised accordingly.

3. Revise plan to show Signature Block on cover sheet per Section 17.4.21 of the Town of Montville Zoning Regulations.
The drawing set has been revised accordingly and a signature block has been added to the cover sheet.

4. Revise Sheet V101 to show lot area in acres & square feet.
The drawing set has been revised accordingly.

5. Revise Surveyor notes on Sheet V101 to add map references and submit original survey.
Sheet V101 now includes the requested map reference and a copy of the original survey is now included as part of the revised plan set.

6. Revise Legend Sheet V101 to state "50'" Wetlands Buffer and on Sheet C501 T2. TEMPORARY STOCKPILE detail note 1.
The drawing set has been revised accordingly.

7. Revise Sheet C101 to show limits of lease area.
Drawing sheet C101 has been revised to show the lease area. This drawing has also been revised to show the Eversource Easement line.

8. Revise Sheet V101 to show limits of existing WPCA sewer easement on sheet V101 and reference map.
The drawing sheet V101 has been revised to show the WPCA sewer easement and plan reference.

9. Revise sheet V101 to show plan scale.
The plan scale of 1" = 60' is now indicated on drawing sheet V101.

10. Revise legend on sheet C101 an “e” is missing in “STRUCTURE”.
The drawing set has been revised accordingly.

11. Revise plan to show silt fence in the areas of temporary disturbance for the trench and access road and add detail to Sheet C501.
The proposed limit of silt fencing has been added to drawing sheet C101 and a silt fence detail added to sheet C501. Please note that silt fencing is not proposed on the landfill cap as it would require driving stakes and trenching through the cap. Silt fencing will be used downgradient of temporary disturbance areas that are outside of the landfill cap and within the upland review area.

12. Revise plan to indicate size of project area in square feet on sheet C101 (ZR Section 17.4.8).
A note has been added to drawing sheet C101 indicating the total size of the proposed solar PV facility, and area within the proposed limit of work.

13. Revise Sheet C101 to show size of the proposed access road, Equipment Pad and Solar Arrays.
The size of the equipment pad and solar array are approximate and may be adjusted slightly prior to construction depending on the type of electrical equipment available during the procurement process. The array and equipment pad locations will not change and will be within the limit of work indicated on the drawings. The limit of work is considered final. Detail 3 on sheet C502 has been revised to include a note with the approximate size of the concrete pad (40 ft by 20 ft).

The width of the existing access road is indicated on the drawings. The access road will be upgraded as part of proposed construction with 3-inches of additional crushed stone. Areas of the existing access road that are less than 10-feet wide will be upgraded to a 10-foot width. The proposed gravel access road/turnaround area shown on C101 has a varying width, as noted on sheet C502, Detail 4.

14. Revise Sheet C101 to show any proposed lighting or add note that there is no proposed lighting as part of this application.
The drawing set has been updated accordingly. There is no proposed lighting as part of this application.

15. Revise Sheet C502 TYPICAL CONCRETE EQUIPMENT PAD detail note 7 to state TOWN OF “MONTVILLE.”
This note is not applicable to this project and has been deleted.

16. Revise Sheet C101 to show zoning compliance note or table for Government zone district bulk requirements.
A note has been added to drawing sheet C101. Please note that per Section 14 of the Town of Montville Zoning Regulations, the Government District does not have bulk requirements for minimum lot size, setbacks, or frontage.

17. Revise plan to show 24-hour Emergency Contact sign at the top and bottom of the access road.
A note has been added to drawing sheet C502, Detail 1 indicating that the emergency contact sign shall be placed at both the top and bottom of the access road. The emergency contact phone number will be established and provided to the Town with the final building application.

18. Revise Sheet C001 “SEEDING AND REVEGETATION PLAN” note 12 to state “as determined by the “Town of Montville Land Use Department.”
The drawing set has been revised accordingly.

19. Erosion & Sediment Control Plan Narrative Sec. 2 states “there is no grading proposed for this project.” It is impractical to think there will be no grading given current existing conditions at the top of the landfill.
There is no soil disturbance to the existing landfill cap proposed for this project due to the requirements to maintain the integrity of the existing landfill soil cap. No excavation or grading of the landfill cap is proposed. Existing soil stockpiles on top of the landfill will be removed for on-site reuse for ballast block leveling pads or for access road maintenance. Any unused/unsuitable stockpiled material will be relocated on the property in coordination with the Town of Montville Department of Public Works.

The limits of the existing sand and gravel stockpiles are indicated on drawing sheet V101. Note 3 on drawing sheet C101 has been revised to indicate that the stockpiles will be removed/reused. Following removal of the piles, a layer of sand will be left in place in the footprint of the former stockpile area. Ballast block foundations will be placed on the sand layer. The ground surface within the footprint of the former stockpiles and between the ballast block foundations will be restored with topsoil, erosion control matting, and grass seed. Proposed final elevation contours are indicated on drawing sheet C101.

20. E&S Control Plan Narrative Sec. 2 page 1 of 2 appears to suggest the existing access "road" (driveway) to the project area will not be improved. The driveway needs to be improved to accommodate the new use and a maintenance plan for regular clearing of vegetation shall be included on the plan set.

The existing access road will be mowed to remove overgrown vegetation. The existing gravel base will be upgraded with approximately 3-inches of imported dense graded crushed stone. Please refer to the detail on drawing sheet C502. The existing conditions survey of the site indicates portions of the existing access road are narrow (approximately 5 feet in width). As part of the access road upgrades, areas of the access road that are less than 10-feet wide will be upgraded to a 10-foot width.

Drawing C001 has been updated to include periodic maintenance of vegetation in the solar PV facility and along the gravel access road.

21. E&S Control Plan Narrative Sec. 2 sheet 1 of 2 states "a concrete washout basin is proposed near the construction entrance/exit." No basin is shown on the plan set.

The drawing set has been revised to show the proposed concrete washout basin on sheet C101.

22. Stormwater Report Conclusion, page 4 of 4 states "The analysis shows no change in peak discharge runoff rates for post-development conditions compared to predevelopment" and "No stormwater management system is proposed as there is no increase in stormwater runoff of volume. Similarly, water quality volume calculations and treatment per the 2004 Connecticut Stormwater Quality Manual are not provided for this project." Water quality volume calculations and treatment per the 2004 Connecticut Stormwater Quality Manual shall be provided for the project area.

Best management practices (BMPs) for post-construction water quality are not practicable for the site since it is a closed landfill and grading for installation of BMPs would compromise the integrity of the existing landfill cap.

The landfill cap is designed to prevent infiltration of stormwater into the underlying waste; therefore, the cap can be considered an impervious surface. The limited proposed impervious features (ballast blocks, concrete equipment pad, and gravel access road/turnaround area) are being added to an already impervious surface and will; therefore, not increase peak runoff rates from the landfill. This is indicated in the stormwater management report submitted to the Town as part of this Site plan application. The drainage maps included in this report model stormwater runoff from the project area to adjacent land, including the Town of Montville Transfer Station.

The 2004 Connecticut Stormwater Quality Manual requires the capture and treatment of the water quality volume to prevent off-Site transport of contaminants such as oils, heavy metals, and/or debris. The proposed additional impervious area is not a potential source of these contaminants. Stormwater runoff patterns and rates are not changed as part of the proposed project, based on the modeling results and, as such, since the site is a closed landfill, post construction stormwater BMPs are not proposed.

Weston & Sampson staff has assisted solar developers and municipalities across the country with the development of ground-mounted solar PV facilities on closed landfills. This includes dozens of project sites in Connecticut (e.g., Newtown, Branford, Cheshire, Bethel Landfills), Massachusetts, New York, and beyond. In our experience, water quality volume calculations and post-construction stormwater BMPs have not been required since the overall runoff patterns do not change.

Per the request of the Town, we have provided a revised stormwater report including a separate calculation for pre- and post-development stormwater runoff from the project area to the transfer station property. These calculations indicate the proposed development will not result in an increase in runoff to the transfer station.

23. Plan is incomplete in that it does not comply with all sections of the Montville Zoning Regulations, including, but not limited to, Section 17 (Site Plans) & Section 18 (Parking, inc. Access Drives) and that no grading & Drainage plan sheet has been provided and water quality volume calculations & treatment per the 2004 Connecticut Stormwater Quality Manual have not been provided for the project area. Also, sheet C001 shall be revised to add note for removal/remediation plan.

It is our opinion that the responses provided in this letter and attached revised drawing set achieve compliance with applicable sections of the Montville Zoning Regulations.

Drawing sheet C101 has been revised to include grading and drainage information, including proposed contours following removal of sand and gravel stockpiles at the top of the landfill. Please refer to response #22 above regarding water quality calculations.

Drawing sheet C001 has been revised to include language on the decommissioning and removal of the solar PV facility.

Should you have any questions, please contact me at (978)532-1900 or Bukowski.Rob@wseinc.com.

Sincerely,

WESTON & SAMPSON ENGINEERS, INC.

Robert J. Bukowski, P.E.
Practice Leader

Attachments:
Design Drawing Set (updated 07/18/2023)
Survey Plan
Stormwater Report (revised July 2023)