NORWICH TECHNOLOGIES

15 Railroad Row
White River Junction, VT 05001

December 13, 2021

George "Sonny" Holt
Chair, Randolph Planning Commission
The Town of Randolph
7 Summer Street, Drawer B,
Randolph, VT 05060

RE Randolph Davis Solar array proposal

Dear Chair Holt,

Thank you for your December 10, 2021 letter requesting a response to an inquiry from residents Joan B. Allen and Michael J. Binder of 1953 Davis Road. We have made several attempts to contact and respond to Allen/Binder concerns without success. Chairman Holt's letter speaks to the Town's concern of "energy facilities developed on lands over 25% slope to protect soil erosion from occurring when any construction occurs in those areas". Below is information relevant to these concerns and as discussed in more detail below, a Vermont licensed surveyor will verify that the solar array is not installed on slopes greater than 25%.

It is Norwich Technologies' commitment to all interested parties to work in collaboration for advancing Vermont's in-state renewable energy goals safely and responsibility. This includes the deployment and installation of the Randolph Davis solar project.

As noted by the Planning Commission, a map presented by the Allen/Binders had a disclaimer stating that it is "for general reference only and data layers may or may not be accurate, current, or otherwise reliable." The Allen/Binder map Norwich Technologies is aware of is from the Agency of Natural Resources ("ANR") Natural Resource Atlas, which contains the Disclaimer

> *DISCLAIMER: This map is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. ANR and the State of Vermont make no representations of any kind, including but not limited to, the warranties of merchantability, or fitness for a particular use, nor are any such warranties to be implied with respect to the data on this map.*

The Project Elevations illustrate the ground profile in north-south and east-west orientations. The average slope of the array along A-A is 15.5% (starting at elev. of +/-810' and ending at elev. of +/-870'). The average slope of the array along B-B is 10% (starting at elevation of +/-820' and ending at elevation of +/-850'). These profiles are based upon ground elevations sourced from LiDAR data from Vermont Center for Geographic Information.

The Site Plan, Page 2, specifically addresses Vermont Erosion Prevention and Sediment Control (EPSC) practices regulated by the ANR Department of Environmental Conservation including, among others:

1) Erosion prevention and sediment control (EPSC) practices shall be implemented in all areas where there is an increased risk of erosion, and where there is potential for discharge of stormwater runoff (either direct or indirect) to a water body.
2) EPSC measures shall be installed prior to any earth disturbing activities within a given drainage area except for land disturbance that may result from accessing the area(s) with equipment in which EPSC measures are to be installed.
3) EPSC measures shall be installed pursuant to the construction phase stormwater discharge permit for the project, the filed EPSC plan, the Vermont Standards and Specifications for Erosion Prevention and Sediment Control and the Vermont Erosion Prevention and Sediment Control Field Guide and other relevant project permits.

While we all are concerned with the potential erosion from installation of solar panels on slopes greater than 25% slopes, all data presented to date is not site specific. Therefore, prior to installation of the panels, Norwich Technologies will confirm the grade slopes in the area of the solar panels by having a Vermont licensed surveyor set grade stakes for the solar array rows location and document the slopes. The parties have noted specific concern to the terrain on the eastern side of the array, and again, confirmation will be secured before any panels are installed in that location. The array will be arranged so that solar panels within the current limit of disturbance are not installed on slopes greater than 25%. The onsite survey data can be provided to the Town and the Allen/Binders upon request.

Thank you again for bringing this to our attention.

Regards,

Martha Staskus
Norwich Technologies, Inc
On behalf of Randolph Davis Solar LLC