



## MEMORANDUM

### 26015/Worthington Planning Board Solar Peer Review

**DATE:** June 10, 2026  
**TO:** Bart Neiswanger, Chair, Worthington Planning Board  
**FROM:** Pare Corporation/Hallam ICS  
**RE:** Technical Memorandum – Peer Review #2

Pare Corporation submitted a technical memorandum to the Town of Worthington Planning Board which led to the promulgation of a series of questions from the Planning Board to the Applicant. The Applicant responded on May 26, 2026. The initial questions, (in black), the Applicants response (in blue) and Pare's reply to the Applicants response below, (in red).

#### 1. Traffic and Access

- a. Please provide a traffic impact analysis or Institute of Traffic Engineers (ITE) trip generation letter report for the construction period and the operation phase.

BW Response: In the October 21<sup>st</sup>, 2025 response to comments, WSP provided a response to construction phase and operation phase vehicle traffic impact analysis. At the start of construction, large construction equipment shall be delivered to the site which will be required for installation of the system (e.g., excavator, bulldozer, skid steer, lull). During construction, (WB67) trucks at a typical length of 67 feet and maximum weight of 80,000lbs are used to deliver materials and equipment approximately 20-35 times, spaced out over the course of a few weeks, 2-3 times per day. Temporary lane obstruction of Ridge Road shall be limited to the minimum time necessary for these large deliveries to enter or exit the access road. Other deliveries are on smaller, straight trucks (typically 10 to 26 feet long), and are typically between 10,000-15,000lbs. During operation, the anticipated traffic will be one pickup truck per quarter of the year for regular maintenance and inspections.

**6/10/2026 The disclosure by Applicant contains the information required by the Bylaw.**

- b. Please provide a turning analysis or vehicle maneuvering plan for the access road and proposed turnaround utilizing the Town of Worthington's largest fire/emergency apparatus.
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BW Response: In the October 21<sup>st</sup>, 2025 response to comments, WSP provided in response Appendix A permit plan set sheet C-102, turning analysis for vehicle maneuvering for a WB67 and WB40, or 67 feet in length and 40 feet in length. The WB67 trucks will only be utilized during construction to deliver equipment and therefore will utilize the temporary construction laydown area to turnaround. The analysis performed at that time also included an aerial fire truck (wheel radius ~38') and pumper fire truck (wheel radius ~42'). The proposed turn radii for the main access road intersection where the turn-around would be performed is 45'. Therefore, a WB40, pumper, and aerial fire truck are all compatible with the proposed permanent access drive. If there is a larger vehicle turn analysis requested, please let us know.

**6/10/2026 The Fire Dept has indicated that the vehicle size used in the turning analysis accurately reflects the largest vehicle operated by the WFRD. As such, no further information is required.**

- c. Please provide an analysis of access to the interior of the array in the case of a brush fire or equipment fire (tractor), working with the Fire Chief to determine appropriate equipment.

BW Response: The proposed design has an inter-row spacing of ~18' from panel to panel, and ~26' center to center, with the fence a minimum 30' distance from panel, for agricultural equipment to access in the interior of the array. We have no objection prior to applying for building permit addressing this comment with WFRD and providing the Building Inspector with all documented communications with WFRD and summary of actions taken by the BlueWave in response to concerns or requirements identified by WFRD.

**6/10/2026 Acknowledged.**

#### Battery Energy Storage System & Interconnection Components

- d. Please provide details of the BESS battery system and building, including interior layout and whether the BESS system is UL listed.

BW Response: As noted in Appendix A of the 2/5/26 Additional Responses to Questions, we provided an illustrative sheet for the e-Storage SolBank 3.0. BlueWave utilizes the most efficient and current equipment, and as such, final equipment selection is dependent on market conditions and supply constraints at procurement. Final selections are therefore typically finalized during the building permit phase.

However, we provided the Board with this range and specification sheet for illustrative purposes during their review. The illustrative product is certified under UL 1973, UL 9540, UL9540A, and final equipment selection will be code compliant, documentation to be provided during the building permit phase. The battery is not housed in a building, it is a self-contained unit. Please see Appendix A of Response to Worthington Fire-Rescue Department Comment dated 5/21/26 for the draft Hazard Mitigation Analysis (HMA) for BESS cabinet interior specifications of the illustrative product.

**6/10/2026 Identification of specific equipment is typically done at the time the building permit is sought. The Planning Board has the option of placing a condition on a potential Site Plan Approval requiring the Building Department and Fire Department review the details of the equipment submitted as part of the building permit application, and determine if the proposed equipment compared to the equipment information furnished to the Planning Board as part of the approval is materially different. If the Fire Department or Building Department determine that the change in equipment is materially different, the matter must be presented back to the Planning Board for further review and approval of the proposed equipment.**

- e. Please provide details on the fire detection and smoke detection system including how it is powered, whether there is a secondary source of power, and what mechanism it uses to report detected smoke or fire and to whom.

BW Response: Please see Appendix A of Response to Worthington Fire-Rescue Department Comment dated 5/21/26 for the draft Hazard Mitigation Analysis (HMA) for BESS fire detection and smoke detection system specifications.

**6/10/2026 BWC has cooperated in the preparation of a Hazard Mitigation Plan (and Emergency Response Plan) as requested by the Fire Department. The Board has the option of placing a condition on a potential Site Plan Approval requiring that a completed Hazard Mitigation Analysis and Emergency Response Plan be submitted and approved by the Fire Department prior to the issuance of a building permit.**

- f. Please provide demonstrate that the BESS building is a suitable enclosure for the batteries.

BW Response: Please see Appendix A of Response to Worthington Fire-Rescue Department Comments dated 5/21/26 for the draft Hazard Mitigation Analysis (HMA) for BESS code compliance. The provided data sheet for the SolBank 3.0 provides information on the BESS enclosure. As stated above, there is no separate building – it is a self-contained unit.

**6/10/2026 Acknowledged. See d. as to potential conditional approval.**

- g. Please provide MSDS for all the parts of the battery system and spill containment features.

BW Response: Please see Appendix A of Response to Worthington Fire-Rescue Department Comment dated 5/21/26 for the draft Hazard Mitigation Analysis (HMA) on BESS code compliance. Page 34, section 5.4, Technology Specific Protection: Lithium-ion batteries do not need to meet the exhaust ventilation requirements of NFPA 855 §4.9, the spill control and neutralization requirements NFPA 855 §4.14 and §4.15, or the safety cap requirements NFPA 855 §9.4. We have no objection to making finalization of the Hazard Mitigation Analysis with verification of all MSDS a condition of site plan approval, to be provided before building permit issuance.

**6/10/2026 The Applicant has indicated that they are agreeable with a conditional Site Plan Approval as indicated in d. above.**

- h. Please provide details of the 2000 kVA transformer, including insulation type and protection features, and provide details of the 4000 Amp switchboard.

BW Response: Please see Appendix C of Response to Board of Health Comment dated 5/19/2026 for a transformer specification sheet. This product is illustrative of the type to be procured. BlueWave utilizes the most efficient and current equipment, and as such, final equipment selection is dependent on market conditions and supply constraints at procurement. Final selections are therefore typically finalized during the building permit phase. The transformer is insulated using Envirotemp FR3 fluid which is bio-based and non-toxic. Protection items include, pressure relief device, liquid level gauge, pressure/vacuum gauge, liquid temperature gauge, load break switch, radiators for cooling protection, fuses and surge arrestors. Switchboard details will be finalized in a building permit phase.

**6/10/2026 Identification of specific equipment is typically done at the time the building permit is sought. The Planning Board has the option of placing a condition on a potential Site Plan Approval requiring the Building Department and Fire Department review the details of the equipment submitted as part of the building permit application, and determine if the proposed equipment compared to the equipment information furnished to the Planning Board as part of the approval is materially different. If the Fire Department or Building Department determines that the change in equipment is**

**materially different, the matter must be presented back to the Planning Board for further review and approval of the proposed equipment.**

- i. Please state whether a sprinkler system is provided, and if so, please provide details showing a dry connection for the fire department to connect to, or details of a permanently connected wet sprinkler system.

BW Response: Please see Appendix A of Response to Worthington Fire-Rescue Department Comment dated 5/21/26 for the draft Hazard Mitigation Analysis (HMA). Per HMA Section 4.1.5, manual fire suppression is not required to suppress a SB3 fire.

**6/10/2026 Identification of specific equipment is typically done at the time the building permit is sought. The Planning Board has the option of placing a condition on a potential Site Plan Approval requiring the Building Department and Fire Department review the details of the equipment submitted as part of the building permit application, and determine if the proposed equipment compared to the equipment information furnished to the Planning Board as part of the approval is materially different. If the Fire Department or Building Department determines that the change in equipment is materially different, the matter must be presented back to the Planning Board for further review and approval of the proposed equipment.**

**6/11/2026, Hallam-ICS: Acknowledged. The submitted HMA indicates that sprinkler coverage is not provided. This is in alignment with current industry practice, and the HMA indicates that appropriate care is taken to distance the BESS from combustible material in the event of a fire.**

- j. Please provide details regarding the size of the battery spill containment or other containment based on sprinkler system type.

BW Response: NFPA 855 and the ICC specifically exempt lithium-ion batteries from spill control and neutralization requirements, as lithium-ion batteries do not contain any liquid that could spill from the container. Recommended tactics are to allow a BESS fire to self-consume and to not apply water, which would eliminate the need for any possible runoff containment in the unlikely event that the runoff would contain any contaminants. Exposure cooling efforts on non-affected equipment would be similar to rain filtering over the unaffected equipment, and there is no real possibility of contamination occurring from this effort.

**6/10/2026 Acknowledged. The remaining question is where the water to cool the nearby equipment would be sourced.**

- k. Please coordinate with the fire department and provide the board a plan for an appropriate hose connection if a dry system is utilized.

BW Response: As noted in the above response, recommended tactics are not to apply water.

**6/11/2026, Acknowledged. The question for hose connection to fire suppression is not relevant in this scenario, as there would not be a hose connection to non-existent sprinkler system inside the BESS. The remaining question is where the water to cool the nearby equipment would be sourced.**

- l. Please provide a Failure Modes and Effects Criticality Analysis as requested by WFRD and provide a hazard mitigation analysis performed by the BESS vendor.

BW Response: Please see Appendix A of Response to Worthington Fire-Rescue Department Comment dated 5/21/26 for the draft Hazard Mitigation Analysis (HMA).

**6/10/2026 BWC has cooperated in the preparation of a Hazard Mitigation Plan (and Emergency Response Plan) as requested by the Fire Department.**

**The Planning Board has the option of placing a condition on a potential Site Plan Approval requiring that a completed Hazard Mitigation Analysis and Emergency Response Plan be submitted and approved by the Fire Department prior to the issuance of a building permit.**

- m. Please provide information from the utility provider regarding the number and configuration of poles required for interconnection. Please include a discussion of the minimum number of poles they require.

BW Response: Please see our response to comment to Beacon Integrated Solutions on January 2, 2026. The site plan shows seven poles for utility interconnection. We are requesting Planning Board approval for the as-designed, standard utility-acceptable interconnection that we can reliably deliver. The utility will not finalize a design until the Interconnection Services Agreement is executed and 100% funded (anticipated to be by the end of 2026).

**6/10/2026 The determination as to the number of poles is typically part of the utility design and ISA. The Applicant did not provide information from the utility company responsive to this question.**

**The Board has the option of approving a set number of poles and any change increase in that number would be a material change requiring the Board's approval.**

**The Board should place a condition requiring that the Interconnection Services Agreement be fully executed and submitted to the Planning Board prior to issuance of a building permit.**

## **2. Emergency Management.**

- a. Please provide safety documentation and emergency procedures related to disaster planning and meet with Town officials to detail an emergency management plan.

BW Response: Please see Appendix A and B of Response to Worthington Fire-Rescue Department Comment dated 5/21/26 for the draft Hazard Mitigation Analysis (HMA) and draft Emergency Response Plan (ERP). We have no objection prior to applying for building permit addressing this comment with Town Officials and providing the Building Inspector with all documented communications on emergency management planning and summary of actions taken by the applicant in response to concerns or requirements identified by Town Officials.

**6/10/2026 BWC has cooperated in the preparation of a Hazard Mitigation Plan (and Emergency Response Plan) as requested by the Fire Department.**

**The Board has the option of placing a condition on a potential Site Plan Approval requiring that a completed Hazard Mitigation Analysis and Emergency Response Plan be submitted and approved by the Fire Department prior to the issuance of a building permit.**

- b. Please review all aspects of emergency management with the Fire Chief and Emergency Management director and submit a draft plan to the board.

BW Response: We met with the Fire Chief on May 8th and reviewed together the draft HMA and ERP. Please see Appendix A and B of Response to Worthington Fire-Rescue Department Comment dated 5/21/26 for the draft Hazard Mitigation Analysis (HMA) and draft Emergency Response Plan (ERP) We have no objection to making finalization of an Emergency Response Plan a condition of site plan approval, to be reviewed with the Fire Chief and Emergency Management Director, to be provided before building permit issuance.

**6/10/2026 BWC has cooperated in the preparation of a Hazard Mitigation Plan (and Emergency Response Plan) as requested by the Fire Department.**

**The Board has the option of placing a condition on a potential Site Plan Approval requiring that a completed Hazard Mitigation Analysis and Emergency Response Plan be submitted and approved by the Fire Department prior to the issuance of a building permit.**

- c. Please discuss whether the plan should or should not include a drinking water hazardous release plan.

BW Response: Both batteries and solar panels have been widely studied to ensure their safety as it relates to water quality. In the 1/2/26 Response to Comment, we provided a number of third party scientific studies, including a fact sheet from the National Renewable Energy Laboratory that highlights a number of scientific studies demonstrating that it is unlikely for any PV module constituents to leach in levels that pose a risk to human health or the environment. That submittal also includes information on BESS safety with groundwater, even in event of emergency. Namely, the MA DOER/DEP/DFS put together a fact sheet showing studies on the chemical byproducts of BESS fires - across 35 documented large-scale BESS fire incidents in the United States that occurred between 2012 and 2024, there has been no evidence of any air, soil, or water contamination at levels that would pose a public health concern or require further remediation." We also provided information from the state of NY, which analyzed the air, soil, and water after BESS emergencies, concluding no harmful levels of toxins detected.

**6/10/2026 Acknowledged.**

### **3. Stormwater Management.**

- a. Please provide the purpose and results of the Geotech or test pit investigations in evidence during the site visit on April 24, 2026. Please include a map or schematic showing the approximate layout of the test pits.

BW Response: The purpose of a geotechnical investigation is to analyze subsurface conditions to support the future construction design of the proposed project. The site field work for this analysis has been completed. The geotechnical report and soil laboratory tests have not been finalized. The approximate test pit investigation

locations have been included in this response, Appendix D.

**6/10/2026 The Board has the option of placing a condition on a potential Site Plan Approval requiring the Applicant submit the results of the geotechnical investigation to assist in determining the appropriateness of the racking system.**

#### **4. Sound impacts and mitigation.**

- a. Please discuss whether you would agree to provide a sound study at the same locations and time of day which includes a pre-construction baseline and observations during operations within six months of commencement of operations. Please provide details as to timing and duration of such a study.

BW Response: Please see Appendix B from Response to Board of Health Comment dated 5/19/2026 for a pre-construction baseline and site-specific sound analysis of the proposed equipment. The project will comply with the MADEP noise policy and the Town of Worthington Zoning By-law with recommended noise barriers next to the proposed equipment pad inverters. We have no objection to making design finalization of the sound analysis recommended noise barriers as a condition of site plan approval, to be provided before building permit issuance. We also do not object to a condition requiring a sound study within six months of commencement of project operations.

**6/10/2026 The Applicant has indicated that they are agreeable with a conditional Site Plan Approval requiring that the project comply with the MADEP noise policy and the Town of Worthington Zoning By-law, with recommended noise barriers next to the proposed equipment pad inverters. The Applicant should take into consideration the anticipated sound from the chosen equipment and design the sound barriers around that information. The Applicant must complete a sound study during the operations phase within six months of commencing operations and install sound barriers as required to maintain compliance with the Mass DEP noise policy and the Town of Worthington ZBL.**

- b. **Please share an existing sound study from** a similar project that includes a BESS and similar tracker technology. Please include a discussion of vibration.

BW Response: Please see Appendix B from Response to Board of Health Comment dated 5/19/2026 on site specific sound analysis. As noted in response

(a) above, the project plans to comply with the MADEP noise policy and the Town of

Worthington Zoning By-law.

**6/10/2026 The Applicant has indicated that they are agreeable with a conditional Site Plan Approval requiring that the project comply with the MADEP noise policy and the Town of Worthington Zoning By-law, with recommended noise barriers next to the proposed equipment pad inverters.**

**The Applicant did not share a study that included tracker technology.**

- c. Please provide sound profiles and complete specs of OEM equipment that will be used.

BW Response: Please see Appendix B Response to Board of Health Comment dated 5/19/2026 on site specific sound analysis.

**6/10/2026 The Applicant has indicated that they are agreeable with a conditional Site Plan Approval requiring that the project comply with the MADEP noise policy and the Town of Worthington Zoning By-law, with recommended noise barriers next to the proposed equipment pad inverters. The Applicant should take into consideration the anticipated sound from the chosen equipment and design the sound barriers around that information. Identification of specific equipment is typically done at the time the building permit is sought.**

**The Board has the option of placing a condition on a potential Site Plan Approval requiring the Building Department and Fire Department review the details of the equipment submitted as part of the building permit application, and determine if the proposed equipment compared to the equipment information furnished to the Planning Board as part of the approval is materially different. If the Fire Department or Building Department determines that the change in equipment is materially different, the matter must be presented back to the Planning Board for further review and approval of the proposed equipment.**

**5. Site landscaping, screening, and security.**

- a. Please discuss whether you would agree to screening along the southeastern boundary to provide screening from the road and the golf course.
  - i. Please provide a plan for such screening. Ideally this screening would be a multilevel mixed mass planting and not a line of solitary single genus plants. It would mimic the eco region of Western MA which is mixed northern hardwood

forest. This could include successional pioneer woodland plants and early colonizing grasses and shrubs.

BW Response: The landowners, the Sena's, would agree to a planting plan on the Town owned land along the southeastern boundary parcel line that is 15'-20' in width to provide screening from the road and golf course. As it would take the existing farm field out of agricultural production, the Sena's are not in agreement on a multilevel mixed mass planting on their property. The applicant would agree to support a proposed vegetative screening and planting plan on the Town owned land in this southeastern area.

**6/10/2026 It is not clear from the response what the Applicant has agreed to provide/support in the southeastern area. Applicant should provide a revised landscaping plan sheet detailing the proposal.**

- b. Please provide a plan for care and maintenance of planted screening both during installation and establishment and on an ongoing basis.

BW Response: We propose a tree performance bond for the project to ensure tree care and maintenance is responsibly managed for the proposed vegetative screening, as a condition of site plan approval, to be provided before building permit issuance.

**6/10/2026 Acknowledged. Such bond should be conditioned to replace dead or diseased screening added as part of the project approval for 3 years.**

- c. Please provide a reference to the requirement for a fence enclosing the array. Please discuss the need for an 8' tall fence. Please discuss other means to provide site security.

BW Response: The agrivoltaic facility will be enclosed by a code-compliant security fence with locked access gates and warning signage. Electrical equipment associated with the project is designed and installed in accordance with the National Electrical Code (NEC), a minimum of 7' tall fence, utility interconnection requirements, and applicable state and local safety standards. The proposed agricultural fixed knot wire fence is dual-purpose, to support potential future animal grazing, does not come at a standard 7' height, thus we've proposed 8'. Appendix F of the submitted Beacon Integrated Responses dated January 2, 2026, is a rendering of a typical warning sign to be installed at the gate, and anywhere along the perimeter fencing where deemed necessary or desirable by the Board.

**6/10/2026 NFPA requires a 7' fence with barbed wire, or an 8' fence. The Board may want to condition approval on installation of the fence 6" from grade to allow passage of small animals.**

- d. Please provide a report on the balloon test carried out in fall of 2025.

BW Response: A balloon test was conducted on November 22, 2025. Appendix B of the Beacon Integrated Responses submitted on January 2, 2026 is the balloon test visual report.

**6/10/2026 Acknowledged.**

- e. Please provide evidence of where the 50' setback ought to begin along Ridge Road and Buffington Hill Road, noting that the town right of way does not always match the property line.

BW Response: The 50' setback was determined via a pre-construction ALTA/NSPS Land Title Survey performed by SGC Engineering, LLC in 2023 and 2024 which certifies that both roads are dedicated and public ways of variable widths. Along Ridge Road and Buffington Hill Road, the right-of-way matches the property line, and the 50' zoning setback is displayed and labeled on the Existing Conditions Plan (Drawing V- 101) and the Proposed Conditions Plan (Drawing C-101).

**6/10/2026 Acknowledged.**

## **6. Decommissioning costs and bonding.**

- a. Please provide supporting documentation that all materials used are recyclable, as assumed in your decommissioning plan.

BW Response: Materials on site including fencing, steel racking, modules, and conduits can be recycled. Glass composes most of the weight of a solar module (about 75 percent) can be recycled. Other materials that are recyclable include the aluminum frames, copper wiring, and plastic junction boxes. Components of the solar facility that have any resale value, such as modules in good working condition, may be refurbished and sold in a secondary market. If not re-used, recycled, or salvaged, material will be disposed of at a licensed facility. For additional information, please visit <https://www.epa.gov/hw/solar-panel-recycling>

**6/10/2026 Acknowledged.**

- b. Please provide locations for disposal and trucking costs based upon those locations.

BW Response: The expected lifetime of a large-scale solar facility is approximately 25- 40 years. Due to the expected life, specific disposal locations have not been selected at this time. Recycling or disposal will only occur at licensed facilities. Trucking costs have been included in the decommissioning plan and cost estimate.

**6/10/2026 Acknowledged. The Board may want to include a condition of approval that the Applicant share all disposal information with the Planning Board as the information is generated.**

- c. Please submit a decommissioning plan estimate with the seal of a qualified engineer.

BW Response: See attached to this response, Appendix A.

**6/10/2026 Acknowledged.**

- d. Please provide an updated decommissioning plan estimate with prevailing wages, in the case that the town must perform the decommissioning.

BW Response: We have added to assumption 6) in Appendix A, prevailing wages.

**6/10/2026 Acknowledged.**

- e. Please update the plan to use more recent inflation figures.

BW Response: We have added to assumption 5) Appendix A, the current average inflation rate from April 2026 of 3.8% to the Decommissioning plan.

**6/10/2026 Acknowledged.**

## **7. Contractor Experience.**

- a. Please detail BWC Wade Stream LLC's requirements for the agrivoltaic construction contractor you will select.

BW Response: BlueWave has committed to developing and constructing successful agrivoltaics projects, supporting farmers and landowners. Our agrivoltaic construction list of requirements is proprietary. We are committed to using contractors who have constructed agrivoltaic projects previously.

**6/10/2026 Acknowledged. The Board may condition the approval on the submission of the identity of and experience of the chosen contractor(s) with agrivoltaic projects.**

- b. Please provide a template bid solicitation used by BlueWave, or any LLC formed by BlueWave, to obtain quotes for agrivoltaic solar projects in Massachusetts.

BW Response: This is business information we cannot disclose; our agrivoltaic template bid solicitation is proprietary.

**6/10/2026 Acknowledged.**

- c. Please discuss whether you would agree to covering the cost of a Project Manager during the construction phase to provide Project Management and Oversight services for the town, as suggested by the Building Commissioner.

BW Response: BlueWave will have a dedicated staff member in the role of Project Manager during the construction phase, providing oversight for the project. We are not opposed to a condition requiring the development of a construction period reporting scope and cadence to the Building Commissioner by this BlueWave staff member, to be provided before building permit issuance.

**6/10/2026 Acknowledged.**

## **8. Ownership and Insurance**

- a. Please provide an updated insurance policy as the current one has expired.

BW Response: Please see Appendix B for updated certificate of insurance for 2026- 2027.

**6/10/2026 Acknowledged.**

- b. Please provide a list of coverages that you would expect to have in place during construction.

BW Response: We have provided a certificate of insurance with list of coverages, in compliance with Town bylaw; Section 8.5; 6. Required Documents; a) 6. Proof of liability insurance.

**6/10/2026 Acknowledged.**

- c. Please provide a list of coverages that you would expect to have in place during operation.

BW Response: We have provided a certificate of insurance with list of coverages, in compliance with Town bylaw; Section 8.5; 6. Required Documents; a) 6. Proof of liability insurance.

**6/10/2026 Acknowledged.**

- d. Please discuss whether you would agree to listing the town on the insurance policy.

BW Response: The Town is listed as the certificate holder on the submitted certificate of insurance.

**6/10/2026 Acknowledged.**

- e. Please discuss whether you would agree to a condition requiring 30 days' notice to the Town of any change in ownership of the equipment, project or the ownership of the LLC.

BW Response: We would agree to a condition requiring 30 days' notice to the Town of any change in ownership of the equipment, project or the ownership of the LLC.

**6/10/2026 Acknowledged.**

## 9. Glare from the panels and other equipment and fixtures.

- a. Please provide the specification sheet for the proposed solar panels, racking system, tracker system and other equipment, sure to include information about potential glare.

BW Response: See attached, Appendix C, for project specific glare analysis based on proposed equipment. No glare is predicted for the residence of the abutting property, the neighboring golf course, or the adjacent roads.

**6/10/2026 Acknowledged.**

- b. Please provide results of any glare studies you are aware of involving similar equipment.

BW Response: See attached, Appendix C, for project specific glare analysis.

**6/10/2026 Acknowledged. Based on Bluewave (BW) FlexTrack – S series solar panel and racking system (Appendix B RTC 10-21-25), the structural materials are Galvanized Steel, but multiple coating colors are avail to relieve mitigate concern of glare from unpainted metal.**

**10. Racking and support system, generally and specifically as to the system's ability to withstand the high winds common in the area of the proposed facility.**

- a. Please detail the method of panel, support and racking installation/ anchoring and provide spec sheets, including wind load ratings.

BW Response: Please see October 21<sup>st</sup> , 2025 response to comments, Attachment B, additional equipment specification sheets. BlueWave utilizes the most efficient and current equipment, and as such, final equipment selection is dependent on market conditions and supply constraints at procurement. Final selections are therefore typically finalized during the building permit phase. However, we provided the Board with these specification sheets for illustrative purposes. Wind load rating is noted on the illustrative tracker sheet, "Wind (IBC-2012/ASCE 7-10), up to 130 mph."

**6/10/2026 Identification of specific equipment is typically done at the time the building permit is sought. The Solar Panels and racking supports provided as illustrative are designed to ASCE 7 and IBC 2012 for up to 130 mph. No Structural Analysis is provided. The Board has the option of placing a condition on a potential Site Plan Approval requiring submittal of the Structural Engineer's report, including design load and calc's.**

**Planning The Board has the option of placing a condition on a potential Site Plan Approval requiring the Building Department and Fire Department review the details of the equipment submitted as part of the building permit application, and determine if the proposed equipment compared to the equipment information furnished to the Planning Board as part of the approval is materially different. If the Fire Department or Building Department determines that the change in equipment is materially different, the matter must be presented back to the Planning Board for further review and approval of the proposed equipment.**

- b. Please discuss what impact the high winds in the project area may have on noise levels produced by this installation relative to other installations.

BW Response: Please see Appendix B from Response to Board of Health Comment dated 5/19/2026 on site specific sound analysis.

**6/10/2026 Acknowledged.**

- c. Please discuss what impact the array may have on snow which currently blows onto Ridge Road.

BW Response: Snow melts faster on solar panels than the ground due to their heat-absorbing surface. This could potentially reduce the amount of snow which currently blows onto Ridge Road. Furthermore, the perimeter fencing to be installed around the field may detain some snow drift also potentially decreasing the amount of snow which currently blows onto Ridge Road. The perimeter fence would be designed and installed to accommodate potential structural loads from wind and snow drift as is standard practice. Snow drift structural loads are not an industry standard concern for tracking solar arrays as the panels can rotate horizontally and would not be considered a stationary vertical obstruction. There is no evidence to suggest the array would increase the amount of snow blowing onto Ridge Road from the site.

**6/10/2026 Acknowledged.**