

Dear Members of the Planning Board,

I am writing in my capacity as Highway Superintendent to provide comments regarding the proposed BlueWave Solar project and the potential impacts to the Town's roadway drainage system and public right-of-way.

Based on existing conditions, there are known drainage issues in the project area that should be addressed before the project proceeds.

South of **140 Buffington Hill Road**, stormwater runoff has historically resulted in flooding and washouts within the Town roadway and along Ridge Road as water flows toward Buffington Hill Road. These conditions have required maintenance by the Highway Department and demonstrate that the existing drainage system is already under stress during significant storm events.

In addition, south of the main driveway at **190 Ridge Road**, the roadside ditch and the culvert beneath the southern field driveway are undersized for the volume of water currently draining from the property. During previous years, this location has experienced roadside washouts due to the inability of the ditch and culvert to adequately convey stormwater. Any increase in runoff or changes in drainage patterns associated with the proposed solar development could further worsen these existing conditions.

The drainage concerns extend beyond erosion and roadway damage. Areas that experience roadside washouts and water flowing onto or adjacent to the roadway also become significant safety hazards during the winter months. Water that remains in roadside ditches or flows across the pavement freezes, creating recurring ice conditions that require additional salting, and maintenance by the Highway Department. These icy conditions present an increased risk to the traveling public and can persist throughout the winter, particularly in shaded areas. It is important that the project does not increase stormwater runoff or alter drainage patterns in a manner that contributes to these existing winter hazards.

I respectfully request that BlueWave Solar provide engineering documentation demonstrating that the project will not increase the volume, rate, or concentration of stormwater reaching the Town's drainage infrastructure. Any analysis should specifically evaluate downstream impacts to Ridge Road and Buffington Hill Road, including existing roadside ditches, culverts, and areas with a history of flooding, washouts, and recurring winter icing.

I also wish to clarify the extent of the Town's public right-of-way. Ridge Road is a four-rod road, providing a public right-of-way that is **66 feet in width**. In many locations, the apparent edge of the roadway does not represent the extent of the Town's right-of-way, as it is commonly identified by existing stone walls. As a result, the proposed solar fence should be located no closer than **33 feet from the centerline of the roadway**, unless the Town determines otherwise.

Furthermore, any vegetative screening, fencing, or landscaping proposed as part of the project should be located entirely on the property owner's land and not within the Town's right-of-way. The Town must retain unobstructed access to its right-of-way for roadway maintenance, drainage improvements, utility work, snow removal, tree maintenance, and any future highway purposes.

Given the existing drainage deficiencies in this area, I recommend that the Planning Board require BlueWave Solar to demonstrate that the project will not adversely affect the Town's drainage infrastructure or increase maintenance responsibilities. If future drainage problems, roadway damage, or winter icing conditions are found to result from the project, BlueWave Solar should be responsible for correcting those issues at no cost to the Town.

Thank you for your consideration of these comments. I respectfully request that this letter be included in the project record and provided to BlueWave Solar for review and response.

Sincerely,

Rheal Labrie  
Highway Superintendent  
Town of Worthington