

MEMORANDUM

26015/Worthington Planning Board Solar Peer Review

DATE: September 17, 2026

TO: Bart Niswonger, Chair, Worthington Planning Board

FROM: Pare Corporation/Hallam ICS

RE: Technical Memorandum – Peer Review #4, Stormwater Report Dated July 7, 2026, Plan set dated July 7, 2026, and geotechnical report dated June 30, 2026

Pare Corporation has submitted three technical memoranda to the Town of Worthington Planning Board through June 2026. The Applicant submitted a revised plan set dated July 7, 2026, a revised stormwater report dated July 7, 2026, and a geotechnical report dated June 30, 2026. The initial questions, (in black), the Applicants response (in blue) and Pare's reply to the Applicants response below, (in red).

1. Comments/Clarifications - Revised Stormwater Report dated July 7, 2026

- The stormwater report has a number of revisions. The reviewer notes that the report does not identify the changes to the report within the Executive Summary. However, based on comparison of the 2/19/26 and 7/7/26 stormwater reports, revisions to the modeling and narrative include increased Limits of work, increased HydroCAD modeled area, and reductions in proposed impervious area and the net increased impervious area.

Pare reviewed the revised report and it has been prepared in accordance with the requirements of Mass DEP Stormwater Regulations and Town of Worthington Zoning Bylaws.

- The report and Wetlands Narrative notes that Mass DEP requires that BWC file a Notice of Intent with the Worthington Conservation Commission. The prior report stated that a Request for Determination of Applicability (RDA) was provided. Apparently, none has been filed to date, and the MA DEP has a superseding order to file an NOI.

Pare has reviewed the Applicant's response and notes that an Order of Conditions from the Worthington Conservation Commission is required before the Board has sufficient information to make a final determination on the approval and conditions to be placed on the stormwater plan.

- In the discussion of peak flows, both reports indicate that the proposed flows will be less than the existing flows. However, despite the reduction in impervious area, both existing and proposed conditions runoff peak flows increased. It appears that this is a result of increased modeled watersheds/catchments.
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- Pare has reviewed the revisions and has the following comments on compliance with Mass DEP Stormwater Standards.
 - **Standard 1 No new untreated discharges.** This standard is met in the revised stormwater report.
 - **Standard 2 Peak Flow attenuation.** This standard is met in the revised stormwater report.
 - **Standard 3 Recharge (static calculations).** This standard is met in the revised stormwater report.
 - **Standard 4 Water Quality Treatment Volume.** This standard is met by the calculations in the revised stormwater report. However, the Applicant did not include the MassDEP TSS removal worksheets for the grassed swale and organic filter.
 - **Standard 5 LUHPPL.** This standard is not applicable to this project.
 - **Standard 6 Critical Areas.** This standard is met in the revised stormwater report. There is no discharge to critical areas.
 - **Standard 7 Redevelopment.** This standard is not applicable to this project.
 - **Standard 8 CPPP.** Applicants have provided a written construction period erosion and sediment control plan; however temporary sediment controls are not clearly shown or called out in the revised plan set.
 - **Standard 9 Long term O & M.** This standard is met in the revised stormwater report.
 - **Standard 10. Illicit Discharge Statement.** This standard is not met. The Applicant must provide the required statement.

2. Comments/Clarifications - Site Plan Revisions dated July 7, 2026

- **Sheet 1, Erosion Control Notes.** No revisions.
- **Sheet 2 Existing Conditions.** No Revisions.
- **Sheet 3 Grading and Earthwork.** No Revisions.
- **Sheet 4 Proposed Conditions.** The sheet was revised to show two solar panel array clusters from a four solar panel cluster array. **The reason is not clear.** The sheet has also been revised to show a vegetative screen on the southeast corner / boundary. Pare notes that the species is slightly different from the species called out for the northeast vegetative screen.
- **Sheet 5. WS Overlay.** No Revisions.
- **Sheet 6 Access Drive.** No Revisions.
- **Sheet 7. Equipment Pads.** The location of the Equipment pads and BESS has been revised to the south side of the access drive. Although electrical Equipment remains within the Watershed Protection District (WSPD), the BESS is outside or beyond the WSPD.
- **Sheet 8 Shadow Analysis.** No Revisions.
- **Sheet 9-10 Details.** No Revisions.

- **Sheet 11 Detail.** The proposed tree planting spacing as shown in the detail for the new vegetation screening seems quite small considering mature growth widths or diameters.

3. Comments/Clarifications - Geotechnical Report dated June 30, 2026

- The purpose of the investigation and report are not indicated.
- BWC has not provided loading and intended foundation support. Pare assumes that it is driven piles or posts.
- Reports glacial till overlaying shallow bedrock.
- Fourteen (14) of seventeen (17) test pits within the proposed solar array. Nine of the test pits had refusal at 4.5' to 9.5' below grade. A total of eight test pits advanced to 10' without refusal.
- Groundwater weeping was observed at 2' to 8' below grade in twelve (12) of seventeen (17) test pits.
- Applicants believe that the arrays can be supported by driven piles and the electrical equipment pads on proper subgrade preparation and material and crushed stone.

Pare notes that array support at locations with less than 10' of existing soil that the posts should be socketed into the bedrock or be ballast supported.

This Technical Memorandum # 4 is intended to be a supplement to Technical Memoranda #'s 1-3. It is limited to a review of the materials filed by the Applicant in July 2026. Pare realizes that Applicant has submitted additional Site Plan and Stormwater Report revisions in August. The review of the August 2026 Site Plan and Stormwater Report will be the subject of Technical Memorandum # 5, to be prepared after discussion of the July revisions and this memorandum with the Applicant.

Respectfully Submitted

Christopher Nolan, Senior Project Coordinator
Pare Corp.