



1600 Manor Drive, Suite 200
Chalfont, PA 18914
215.996.9100

May 25, 2023
VIA FedEx and Newforma

Westtown Township
1039 Wilmington Pike
West Chester, PA 19382

Attention: Mila Carter, Director of Planning & Zoning

Re: Proposed Solar Field
Westtown School
975 Westtown Road
Westtown Township
Chester County, PA
PAA220507.00

Dear Mila:

Regarding the above referenced project, please find enclosed:

- Eight (8) copies of the Meeting Notice – Historic Resources Map Amendment 2022 prepared by Kyle Dool, Westtown Township Historical Commission Liaison
- Eight (8) copies of the Westtown Township Historic Resources Map
- Eight (8) copies of the Wetland Inspection Summary & Environmental Land Use Regulatory Evaluation prepared by Roux Associates, Inc., dated 09/23/2022
- Eight (8) copies of the PECO Electric Recommendation dated 10/27/2022
- Eight (8) copies of the Easement and License Use Agreement Exhibit
- Eight (8) copies of the Glare Statement prepared by Andy Stancati, BSR Solar LLC, dated 05/19/2023
- Eight (8) copies of the Glare Analysis prepared by ForgeSolar, last revised 05/11/2023
- Eight (8) copies of the Visual Impact Analysis prepared by Bohler, last revised 05/25/2023
- Eight (8) copies of the Report of Exploration, Addendum prepared by Geo-Technology Associates, Inc., dated 05/23/2023
- Eight (8) copies of the Stormwater Report prepared by Bohler, dated 04/03/2023, last revised 05/25/2023
- Eight (8) copies of the Conditional Use/Grading Permit Plan Set prepared by Bohler, dated 04/03/2023 last revised 05/25/2023

Our office is in receipt of this review letter below:

- Westtown School Solar Panel Facility – 975 Westtown Road Conditional Use Application Review dated 04/11/2023, prepared by Mila Carter, Director of Planning & Zoning, Westtown Township
- Conditional Use Application, Westtown School Solar Panel Facility dated 04/16/2023, prepared by Gerald DiNunzio, JR, Township Fire Marshal
- Westtown School Solar Farm Conditional Use Review dated 04/21/2023, prepared by Robert E. Flinchbaugh, P.E., Municipal Team Lead, Cedarville Engineering Group, LLC

- Westtown-East Goshen Regional Police Department Review dated 04/21/2023, prepared by Brenda M. Bernot, Chief of Police

Please find our responses below in **bold**.

975 Westtown Road Conditional Use Application Review dated 04/11/2023

Please be advised that the Township has reviewed your application for compliance with Conditional Use submission requirements as per 170-2009 Conditional Uses and 170-1618 Renewable energy systems as applicable. The Township considers your application substantially complete; however, there are certain items to be addressed, which are described in detail below:

1. Proposed improvements shall be labeled on sheet C-301 of the Permit Plan to indicate the solar panel facility, fence, generator pad, and others as applicable.

Response: Sheet C-301 is revised to label all proposed improvements.

2. §170-2009.B(4) requires the scale of the Permit Plan to be one inch to 50 feet.

Please let the Township know if this requirement cannot be met.

Response: The breakdown site plan sheets C-302 through C-305 are provided at a scale of 1 inch to 30 feet for greater legibility of existing and proposed features.

3. §170-2009.B(7) requires the applicant to include site analysis and the conservation design process (§170-1617).

Although several requirements are included on the submitted Permit Plan, the applicant shall review the outstanding items and address those as appropriate.

Response: An Existing Resources and Site Analysis Plan is provided. Refer to sheet C-201.

4. §170-1618.C(1)(c) requires a principal solar energy system to be set back a minimum of 100 feet from any historic structures as may be designated by the Township or determined to be eligible for listing on the National Register of Historic Places (NRHP) by the Pennsylvania Historical and Museum Commission (PHMC) or the National Park Service (NPS). There are several Westtown School buildings, specifically along E Street Road and Westtown Road, which have been identified by the Township to be on or eligible for the NRHP. Please indicate these historic structures on the Permit Plan to ensure that the distance requirement is met.

Response: Sheet C-301 Overall Site Plan is revised to show a 100-foot historic structure setback measured from the solar array to demonstrate that this requirement is met. A Historic Resources Map is also enclosed.

5. §170-1618.C(1)(d) requires the entire facility comprising a principal solar energy system and its appurtenant structures and equipment to be enclosed by a fence, barrier or other appropriate means to prevent or restrict unauthorized persons or vehicles from entering the facility. All mechanical equipment shall be completely enclosed by a minimum eight-foot-high fence with a self-locking gate.

The Permit Plan does not indicate whether the transformer will be enclosed by a fence with a self-locking gate.

Response: The Permit Plan is revised to show the transformer enclosed by a fence with a self-locking gate. Refer to sheets C-301 and C-305.

6. §170-1618.C(1)(e) requires that an automatic disconnect device to be installed at each cluster.

The automatic disconnect devices are not noted on the Permit Plan.

Response: There are disconnect switches located at the array which automatically shuts off power to all inverters. Each inverter is also equipped with a manual AC and DC disconnection to shut off power to each inverter. Per industry requirement if power is shut off to the system, all inverters will cease to produce power (UL1741). Refer to Site Specific Note 14 on sheet C-102.

7. §170-1618.C(1)(f) requires a principal solar energy system not to include the co-location of batteries or other equipment used to store the energy output from the system except where approved by the Board of Supervisors as a condition of conditional use approval upon satisfaction that adequate safety precautions are included in the design of the system.

The applicant shall verify that this requirement is being met.

Response: The Applicant will comply with this requirement. Refer to Site Specific Note 8 on sheet C-102.

8. §170-1618.C(1)(g) requires a principal solar energy system to be serviced by an adequate water supply for firefighting purposes.

The applicant shall verify that this requirement is being met.

Response: Sheet C-301 Overall Site Plan is revised to identify the nearest existing fire hydrant in relation to the proposed solar array.

9. §170-1618.C(4) requires the design and installation of the solar energy system conform to applicable industry standards, such as those of the American National Standards Institute (ANSI), Underwriters Laboratories, the American Society for Testing and Materials (ASTM), or other similar certifying organizations, and comply with the Township Building Code and with all other applicable fire and life safety requirements.

The Permit Plan shall include a statement addressing this requirement.

Response: This statement is added to the Permit Plan. Refer to Site Specific Note 9 on sheet C-102.

10. §170-1618.C(5) requires a solar energy system connected to the utility grid shall provide written authorization from the local utility company acknowledging and approving such connection.

The applicant shall verify that this requirement is being met.

Response: Please refer to the enclosed PECO Interconnection Agreement.

11. §170-1618.C(6) requires all power transmission lines from the solar energy system to any building or other structure shall be located underground.

The applicant shall verify that this requirement is being met.

Response: The Permit Plan is revised to specify that electric lines are to be buried underground. Refer to Site Specific Note 11 on sheet C-102 and labels and legends on sheets C-301 through C-305.

12. §170-1618.C(8) requires that no solar energy system shall contain hazardous substances as defined in the Pennsylvania Hazardous Sites Cleanup Act, 35 P.S. §6020.101 et seq.

The Permit Plan shall include a statement addressing this requirement.

Response: This statement is added to the Permit Plan. Refer to Site Specific Note 10 on sheet C-102.

13. §170-1618.C(9) requires that solar energy systems shall not be artificially lighted except to the extent required for safety or by any applicable federal, state or local authority.

The applicant shall verify that this requirement is being met.

Response: The Applicant will comply with this requirement. Refer to Site Specific Note 12 on sheet C-102.

14. §170-1618.C(10) requires that solar energy systems and appurtenant or accessory structures shall not display any advertising, except for reasonable identification of the panel or other equipment manufacturer, and the facility owner.

The applicant shall verify that this requirement is being met.

Response: The Applicant will comply with this requirement. Refer to Site Specific Note 13 on sheet C-102.

15. §170-1618.C(12)(b)[1]-[4] requires the applicant or the installer or manufacturer of the solar energy system to submit with the application for conditional use approval signed statements pertaining to glare prevention as described in referenced sections.

The applicant shall include appropriate statements to the Permit Plan.

Response: Please refer to the enclosed Westtown School Solar Conditional Use Permit Application Glare Statement.

16. §170-1618.C(14) requires solar access easements to ensure solar access without reliance on adjacent properties.

The proposed transformer is to be located at a different than solar energy system parcel. The applicant shall consult its legal counsel whether solar access easements are warranted and provide that feedback to the Township.

Response: Both parcels are under the same ownership. An easement for access to the subject parcel is provided through Biostar's lease with the Westtown School. Please refer to the enclosed Easement and License Use Agreement to be executed pending project approval.

17. §170-1618.C(16)(d) requires the extent of impervious coverage of sloping panels to be measured as equal to their horizontal footprint.

The applicant shall provide detailed calculations on proposed impervious coverage specific to solar panels on the Permit Plan.

Response: The Permit Plan is revised to provide a detail of the solar panel to support the impervious surface area of the panels notes in the Impervious Surfaces Summary Table on sheet C-301. Refer to Solar Panel Detail on sheet C-901 Details

18. §170-1618.C(17) states that in consideration of conditional use approval the Board of Supervisors shall be satisfied that the solar installation will not unduly impact other property owners or the traveling public or that potential impacts are mitigated by design of the system or structure(s) upon which it is mounted, by distance from points of visibility, by the presence of intervening topography, vegetation or structures, or will be mitigated through introduction of landscaping.

The applicant shall indicate on the Site Visual Analysis Plan the existing and proposed features, including landscaping buffer.

Response: The Site Visual Analysis exhibits are revised to identify the proposed solar array and proposed landscaping buffer. Glare profiles indicating sight lines and glare lines are included. Refer to sheets C-801-C-804.

Conditional Use Application, Westtown School Solar Panel Facility dated 04/16/2023

- **Water supply:** The closest fire hydrant is on Shady Grove Way at Thrush Lane. I want to determine the exact distance the array is from that fire hydrant. The fire apparatus carries approximately 1500 to 2000 feet of hose used to connect to the fire hydrant. Also, the hydrant on Shady Grove Way is on the east side of the roadway; if the fire department uses this hydrant for suppression purposes, Shady Grove Way must be closed to all traffic during the incident. Closing that road would add a challenge for access to additional fire department resources.

Response: Sheet C-301 Overall Site Plan is revised to identify the nearest existing fire hydrant in relation to the proposed solar array which is 524.5 feet away.

- **Automatic disconnect devices:** I did not see any automatic disconnect devices on the plan for the solar panel array.

Response: Automatic disconnect devices will be provided. Refer to Site Specific Note 14 on sheet C-102 and callout on plan sheet C-302.

- **Access concerns:** Will the gravel pathway accommodate a piece of fire apparatus? I also recommend a second access point separate from the gravel pathway for emergency vehicles. Since a fence will secure the array to prevent unauthorized access, a Knox Box should be installed at the array with corresponding keys to all emergency personnel access.

Response: Sheets C-301 and C-302 are revised to locate a secondary access gate. Both gates are noted to provide a Knox Box. The enclosed geotechnical report shows that loading requirements will be met for the proposed gravel pathway.

- **Transformer pad:** Will the transformer pad also be secured by a fence, and if so, the fire department will need access in the event of an emergency; an additional Knox Box with keys would be requested due to the distance of the transformer from the array.

Response: The Permit Plan is revised to show the transformer enclosed by a fence with a self-locking gate. It is noted for a Knox Box to be provided at this gate. Refer to sheets C-301 and C-305.

- **Batteries:** Does the plan include batteries to store energy?

Response: Batteries are not proposed as part of this project. Refer to Site Specific Note 8 on sheet C-102.

Westtown School Solar Farm Conditional Use Review dated 04/21/2023

Chapter 170-Zoning

1. Section 170-1618. C.(1) – Solar Energy systems. Solar energy system shall be permitted, subject to the following regulations and with the understanding that when a provision herein does not specifically refer to either accessory or principal uses, it shall apply to both: Principal use. A solar energy system shall be permitted as a principal use subject to conditional use approval in the T-Township and A/C Agricultural/Cluster Residential Districts only, subject to the following and as otherwise provided herein; any solar energy system not meeting the criteria for an accessory solar energy system shall be considered a principal use:
 - a. The maximum area occupied by a principal solar energy system on any lot shall be 10 acres;
 - b. Notwithstanding lot coverage limitation set forth in the base zoning district(s), the maximum impervious coverage for a principal solar energy system and any accessory or appurtenant structures shall be 20% of the lot area:
 - c. A principal solar energy system shall be set back a minimum of 100 feet from any public right-of-way, any lot line, and any historic structure as may be designated by the Township or determined to be eligible for listing on the National Register of Historic Places by the Pennsylvania Historical and Museum Commission or the National Park Service:
 - d. The entire facility comprising a principal solar energy system and its appurtenant and accessory structure(s) and equipment shall be enclosed by a fence, barrier or other appropriate means to prevent or restrict unauthorized persons or vehicles from entering the facility. Clearly visible warning signs shall be placed on the fence, barrier or at the perimeter of the facility to inform individuals of potential voltage hazards. All mechanical equipment associated with the facility shall be completely enclosed by a minimum eight-foot -high fence with self-locking gate.
 - e. Proper aiseways between panel cluster sections, at least eight feet in width, shall be provided for safe access to clusters. DC/AC inverters shall be installed at each cluster, in addition an automatic disconnect device.
 - f. A principal solar energy system shall not include the co-location of batteries or other equipment used to store the energy output from the system except where approved by the Board of Supervisors as a condition of conditional use approval upon satisfaction that adequate safety precautions are included in the design of the system.
 - g. A principal solar energy system shall be serviced by an adequate water supply for firefighting purposes.

The following shall be addressed:

- The issues included in the April 11, 2023, Completeness letter from Westtown Township shall be addressed to the satisfaction of the Township Zoning Officer.

Response: Please refer to the responses provided above regarding the Conditional Use Application Review.

- The applicant shall clarify on the Zoning Table, sheet C-301, specifically what the 7.78 acres shown includes (i.e., area within fence, limit of disturbance, etc.).

Response: The 7.78 acres previously referred to the area within the solar array enclosure. This number is revised to reflect the latest enclosure area.

- The total resultant impervious coverage, including the additional impervious coverage referenced under the Impervious Surfaces Summary Table, sheet C-301, shall be referenced under the Zoning Table, same sheet.

Response: The Zoning Table is revised to include the total resultant impervious coverage on the parcel.

- The applicant shall clarify the limits of equipment access required between the panel clusters. The plan currently shows a stabilized area limited to the middle section of the solar facility; the applicant shall demonstrate that equipment shall be limited to the area labeled as “Proposed Gravel Pathway”.

Response: Vehicular access is not permitted between panel rows. Refer to Site Specific Note 15 on sheet C-102.

- A detail of the warning sign, including the sign location and intervals of installation along the fence, shall be provided.

Response: Refer to “Warning Sign Detail” provided on sheet C-901.

- The applicant shall address the need for storage of energy output as referenced in the above Ordinance section.

Response: Refer to Site Specific Note 8 on sheet C-102.

- The issues included in the above referenced August 16, 2023 letter from the Westtown Township Fire Marshal shall be addressed to the satisfaction of the Fire Marshal as it pertains to adequacy of water supply for firefighting purposes.

Response: Response: Please refer to the responses provided above regarding the Fire Marshal Review.

2. Section 170-1618.C.(9) – Lighting Solar energy systems shall not be artificially lighted except to the extent required for safety or by applicable federal, state, or local authority.

The following shall be addressed:

- The applicant shall confirm the lighting to be installed. The location and associated details of the lighting to be used shall be provided on the plan.

Response: No lighting is proposed as part of this project. Refer to Site Specific Note 12 on sheet C-102.

- If lighting is to be proposed, a Lighting Plan shall be provided, to demonstrate compliance with the criteria set forth in Zoning Ordinance Section 170-1514.

Response: No lighting is proposed as part of this project. Refer to Site Specific Note 12 on sheet C-102.

3. Section 170-1618.C.(17) – Conditional use approval. In consideration of conditional use approval where required pursuant to this section, in addition to review of the standards for conditional use approval set forth in Section 170-2009D of this chapter, the Board of Supervisors shall be satisfied that the solar installation will not unduly impact other property owners or the travelling public or that potential impacts are mitigated by design of the system or structure(s) upon which it is mounted, by distance from points of visibility, by the presence of intervening topography or structure, , or will be mitigated through introduction of landscaping.

Section 170-1618.C.(17) (a)- Any application for conditional use approval for a principal solar energy system shall include submission of a visual analysis demonstrating that the system is designed and located to meet the objectives stated above.

Section 170-1618.C.(17) (b)- As a condition of approval, the Board of Supervisors may require a buffer yard around the perimeter of any facility comprising a principal solar energy system and its appurtenant or accessory structure(s) and equipment providing a continuous visual screen between such facility and any adjacent property, public right-of-way or historic structure as viewed by a person standing at ground level.

The applicant has submitted a Glare Analysis and Visual Impact Analysis Exhibits. The following shall be addressed:

- The Visual Impact Analysis Exhibit shall include individual profiles of glare produced by the panel and its effect on all properties adjacent to the subject tract. This includes the adjacent properties located along Shady Grove Way, East Street Road, Station Way and Westtown Road.

Response: Please refer to the Glare Profile Plan and Profiles provided on sheets C-801 through C-804 which profile multiple vantage points along Shady Grove Way, East Street Road, Station Way, and Westtown Road.

- Based upon the above referenced profiles, visual screen, including but not limited to landscape buffering and berms shall be provided to adequately obscure glare from the panels to the referenced properties and to traffic along Shady Grove Way and Street Road. The Overall Site Plan, sheet C-301, shows a proposed landscape buffer limited to the northern portion of the tract, abutting Shady Grove Way.

Response: Based on the Glare Profiles and Glare Study results, the proposed buffer provided along Shady Grove Way is the only location where proposed screening is necessary and this buffer provides adequate glare protection.

- A detail of the buffering used to obscure glare shall be provided on the plan.

Response: A Landscape Plan with additional details on the proposed plantings is provided. Refer to sheets C-701 and C-702.

4. Section 170-1618.C.(12)(b) – Glare. The applicant or the installer or manufacturer of the solar energy system shall submit with the applicant for permit or conditional use approval, as applicable, as signed statement including the following:
 - a. Section 170-1618.C.(12)(b)[1] – Certification that the proposed system shall not project glare or reflect concentrated solar radiation visible beyond the property lines of the property upon which the solar energy system shall be located such that a nuisance situation is created;
 - b. Section 170-1618.C.(12)(b)[2] – Acknowledgement that, should any glare or concentrated solar radiation projected prove to be visible beyond the property lines of the property upon which the solar energy system shall be located, at any time subsequent to the installation of the system, such that, in the opinion of the Zoning Officer, a nuisance situation or safety hazard arises for another property owner or the travelling public, the Township may at its discretion require mitigative action or may require the removal of the system or portion thereof generating the glare or reflected solar radiation;
 - c. Section 170-1618.C.(12)(b)[3] – Acknowledgement that, should any mitigation or system removal deemed necessary by the Township fail to be dealt with in accordance with the Township's determination within six months of notification of the landowner and/or system owner, or immediately in any case determined to be a safety hazard, the Township may implement such mitigation or remove such systems as it deems necessary, costs therefore to be reimbursed within 90 days, and if not, a commensurate lien shall be placed upon the property.

- d. Section 170-1618.C.(12)(b)[4] – Acknowledgement that the obligations set forth herein shall continue so long as the subject solar energy system remains in operation and that any subsequent property owners shall be so notified.

Receipt of the above shall be confirmed by the Township Zoning Officer.

Response: Please refer to the enclosed Glare Statement prepared by the Applicant.

5. Section 170-1618.C.(14)– Solar access easements. A solar energy system shall be located to ensure solar access without reliance on adjacent properties. Where any applicant desires to ensure that solar access to a solar energy system shall not be obstructed of time by permissible uses or activities on any adjacent property (i.e. by planting or growth of vegetation, new construction, etc.), it shall be the responsibility of the owner of the solar energy system to obtain appropriate solar access easement(s) from neighboring property owner(s) and to notify the township upon the recording of any such easement(s). All solar access easements shall be recorded in the office of the Chester County Recorder of Deeds.

This solar system is located on Parcel 67-2-27. Access to this tract will require adjoining parcels to be used to access this tract. In addition, the installation of the electric line and transformer associated with the facility will require construction on an adjacent parcel.

The following shall be addressed:

- Proposed access from a public roadway to Parcel 67-2-27 shall be shown on the plan.

Response: Both parcels are under the same ownership. An easement for access to the subject parcel is provided through Biostar’s lease with the Westtown School. Please refer to the enclosed Easement and License Use Agreement to be executed pending project approval.

- An easement will be required to permit access as referenced above, though all affected parcels. Easement agreements prepared and executed in a form acceptable to the Township Solicitor will be required prior to issuance of applicable Township permits associated with this project and shall be recorded concurrently with the Stormwater Management BMP Operation and Maintenance Agreement to be required for the project.

Response: Both parcels are under the same ownership. An easement for access to the subject parcel is provided through Biostar’s lease with the Westtown School. Please refer to the enclosed Easement and License Use Agreement to be executed pending project approval.

- The plan shall clearly show all tax parcel boundaries and numbers, with applicable line type reference included in the plan legend.

Response: The plan is revised to show and label all tax parcel boundaries and numbers with the applicable line type included in the legend. Refer to the Overall Site Plan sheet C-301.

6. Section 170-2009.B.(3).(d) - The application shall include sufficient information, e.g., preliminary site grading and road profiles, preliminary stormwater management analysis, etc., to preliminarily determine compliance with the Township natural feature, site analysis, conservation design process (if applicable) and density requirements.

Section 170-2009.B.(6).(b) – In addition to demonstrating compliance with all standards applicable to the conditional use being requested, the site plan shall show the applicant’s intentions with regard to the following: Location, approximate dimension, and arrangement of all

areas devoted to ground cover, trees, screen planting, pen space, recreation, and similar purposes, as applicable.

Section 144-202 - Definitions – REDEVELOPMENT: Any regulated activity that involves demolition, removal, reconstruction, or replacement of existing impervious surface(s).

Section 144-202 - Definitions – NEW DEVELOPMENT: Any regulated activity involving placement or construction of new impervious surface or grading over existing pervious land areas not classified as redevelopment as defined in this chapter.

Section 144-301.Q – Applicants shall utilize the Pennsylvania Stormwater Best Management Practices Manual (PA BMP Manual), as amended, or other sources acceptable to the Municipal Engineer, for testing and design standard for BMPs, and, where there is a conflict with the provisions of this chapter, the most restrictive applies.

Section 144-308.H – Regulated activities located within the Chester Creek Watershed shall achieve the applicable peak flow release rate control requirements presented in the approved Act 167 Plan for that watershed in Table 308.2 below and as presented in the Chester Creek Watershed Release Rate Map in Appendix F of this Chapter.

District	Control Criteria
100%	Post-development peak discharge for all design storms must be no greater than predevelopment peak discharges.
75%	Post-development peak discharge for all design storms must be no greater than 75% of the predevelopment peak discharges.
50%	Post-development peak discharge for all design storms must be no greater than 50% of the predevelopment peak discharges.

Section 144-309.D - The applicant shall utilize the following ground cover assumptions for all predevelopment water quality and runoff volume, infiltration volume and peak flow rate calculations:

1. For regulated activities involving new development, the following ground cover assumptions for all predevelopment water quality and runoff volume, infiltration volume and peak flow rate calculations.
 - a. For areas that are woods (as defined in Article II of this chapter), predevelopment calculations shall assume ground cover of woods in good conditions.
 - b. For all other areas (including all impervious surfaces), predevelopment calculations shall assume ground cover of meadow.

The following shall be addressed:

- The Detail Sheet, sheet C-901, shows a “Gravel Path Paving Detail, consisting of “12 inches gravel”. Plan Sheet C-303 references the construction of a “Proposed Gravel Pathway” providing access from an existing driveway to the proposed facility. This area represents the only means of vehicular, equipment, and emergency vehicle access to the solar facilities. The plan and associated details shall be revised to reflect a pavement design appropriate for adequately accommodating the referenced traffic loading.

Response: The enclosed geotechnical report shows that loading requirements will be met for the proposed gravel pathway. The gravel pathway detail is revised to meet their recommendations. Refer to sheet C-901.

- Proposed grading of the above referenced access driveway shall be provided to accurately show the limit of disturbance associated with the driveway construction.

Response: Proposed grading related to stormwater management is shown on the plan. No grading is proposed as part of the pathway installation. Refer to sheets C-302 and C-303.

- Stormwater management facilities will be required downslope of the above referenced access driveway and the proposed electric line/transformer installation, in accordance with the applicable criteria set forth in the Township's Stormwater Management Ordinance, Chapter 144. Stormwater management BMPs are only shown downslope of the solar facility.

Response: The plan is revised to provide two basins downslope of the solar facility and gravel pathway. The area of electric line trenching is not considered disturbance because the line will be installed by directional boring and the transformer area is proposed to be within an uncompacted gravel area which is considered pervious by the stormwater management ordinance definition. Therefore, these areas do not require stormwater management.

- The Site Plan shall be revised to clearly show all existing facilities in the vicinity of the proposed electric line and transformer, including but not limited to buildings, parking areas, driveways, and athletic facilities.

Response: The plan is revised to show all existing facilities on site within 100 feet of the limit of disturbance. Refer to sheets C-302 through C-305.

- The plans propose two (2) Vegetative Filter Strips to be utilized as stormwater management BMPs for the project. Per the Pennsylvania BMP Manual, BMP 6.4.9, this BMP is to be utilized in areas receiving sheet flow, with the minimum filter width equaling the width of the contributing drainage area. Based upon the existing topography and length of flow being conveyed to these areas. Vegetative Filter Strips are not acceptable for this application. Alternative BMPs shall be provided, meeting the requirements set forth in the Township's Stormwater Management Ordinance and the Pennsylvania BMP Manual.

Response: The plan is revised to propose aboveground infiltration basins as the BMPs to support the development. Refer to sheets C-301 through C-303 and the enclosed stormwater management report.

- The Stormwater Management Narrative indicates that a land cover of row crop was assumed as a pre-development condition for calculating pre-development flows. Development of this site shall be considered New Development in accordance with the definition referenced above, therefore all cover located within the project limit of disturbance shall be considered Meadow in predevelopment condition, in accordance with Section 144-309.D, of the Township's Stormwater Management Ordinance. Calculations shall be revised accordingly, to demonstrate compliance with the peak rate control requirements set forth in Section 144-308.H of the Township's Stormwater Management Ordinance.

Response: The calculations are revised to model the land cover as follows per discussion with the Township on 05/17/2023:

- 20% of the existing compacted pathways within the limit of disturbance are modeled as meadow and the remaining 80% is modeled as impervious in the pre-development condition.
- Areas where meadow mix is proposed in the post-development condition can be modeled as meadow, contingent upon providing the BMP Manual guidelines for meadow long term operation and maintenance notes on the plan and in the operation and maintenance agreement.

Refer to the enclosed stormwater management report and O&M Notes on sheet C-901.

- Financial security and an applicable agreement, in a form deemed acceptable to the Township solicitor, shall be provided to ensure satisfactory completion of the improvements associated with the development, including but not limited to:
 - Erosion and sedimentation control facilities
 - Access construction
 - Stormwater management facilities
 - Site buffering required for glare control.
 - Site lighting (if applicable)

Response: An Opinion of Probable Cost will be provided upon approval.

Westtown-East Goshen Regional Police Department Review dated 04/21/2023

The Command Staff of the Westtown-East Goshen Regional Police Department has reviewed the Westtown School Solar Panel Facility proposal and have no concerns about its potential impact to police services provided to Westtown Township.

Thank you for the opportunity to review the application and provide input. If any changes to the proposal occur, please feel free to contact us regarding a revised assessment.

Response: Acknowledged.

Should you have any questions or require additional information, please contact our office.

Sincerely,

BOHLER ENGINEERING PA, LLC



Chris Puzinas, P.E.
Project Manager

cc:

Jonathan Altshul, Township Manager (via *Newforma*)
Andy Stancati, BSR Solar, LLC (via *Newforma*)
Erin Lalli, E.I.T., Bohler Engineering (via *Newforma*)
Gina M. Gerber, Esq., RRHC (via *Newforma*)
Ryan M. Furlong, Esq., RRHC (via *Newforma*)
Kate Donnelly, Westtown School (via *Newforma*)
Louis Colagreco, RRHC (via *Newforma*)
Michael Eckerd, BSR Solar, LLC (via *Newforma*)
David Smart, BSR Solar, LLC (via *Newforma*)
Bob Flinchbaugh, Cedarville Engineering, (via *Newforma*)

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