

Narrative of Compliance

Dimension Renewable Energy (Dimension) is proposing the construction and operation of the Greenville CSG LLC Solar Project (Project) located off Moosehead Lake Rd in Greenville, Maine. The Project is located on the parcel identified as Lot 27 on the Greenville Tax Maps. As defined in the Town of Greenville Land Use Ordinance, the Project is considered a Large Scale Solar Energy System as it occupies more than 20,000 square feet. The Village Commercial District, recently established at the Special Town Meeting held on 10/20/20, includes Large-Scale Solar Energy Systems as an allowed use.

The Project occupies an area of approximately 19.74 (Site) acres and proposes 9.68 acres of tree clearing to build the Project. The limit of disturbance (LOD) includes the extent of tree clearing, gravel access road, the solar panels, equipment pads, and overhead equipment associated with interconnection to the utility infrastructure.

The Project will not rely on any municipal services. Utilities such as water, sewage, stormwater drainage, or solid waste disposal will not be impacted during Project construction or operation.

Zoning & Project Maps

The Project is an allowed use within the Village Commercial District. See **Appendix B** for Project maps including the updated zoning map, tax map, aerial imagery location map, public water supply location map, topographic location map, and boundary survey map.

Site Plan

The Site Plan is included as **Appendix C** and includes all applicable requirements listed in Table III-1 of the Land Use Ordinance for the Town of Greenville.

Natural Resources

Boyle Associates performed a natural resources survey of the Project including wetland and waterbody delineation and potential vernal pool survey. Site visits occurred in December 2019 and May 2020. Results of the natural resources survey have informed the Project design and the Project does not propose any alteration to regulated natural resources. See **Appendix D** for maps of natural resources and significant wildlife habitats in proximity to the Site.

Agency Correspondence

An inquiry letter was sent to Maine Department of Inland Fisheries & Wildlife (MDIFW) on December 4, 2019 to determine the presence of any protected species or habitats. In the MDIFW response (**Appendix E**), received January 6, 2020, the MDIFW reported that the department “has not mapped any Essential Habitats that would be directly affected by your project.”

The Maine Natural Areas Program (MNAP) was also sent an inquiry letter on December 3, 2019 to review the Site for any Rare, Threatened, and Endangered (RTE) botanical species and any other unique natural communities or features. **Appendix E** includes MNAP’s response received December 3, 2019, which reports “there are no rare botanical features documented specifically within the project area”.

Abutting Property Owners

The following table lists the names and address of all property owners within 300 feet of the edge of the property line of Tax Map 4, Lot 27. Direct abutters are also shown on the boundary survey map and tax map included in **Appendix B**.

PROPERTY ADDRESS	PARCEL INFO (MAP/LOT)	PROPERTY OWNER
MOOSEHEAD LAKE RD	MAP 4/ LOT 31	SAMUEL & KIRSTEN DELRUSSO
MOOSHEAD LAKE RD	MAP 4/ LOT30	MICUE FARM PARTNERS, LLC
244 MOOSEHEAD LAKE RD	MAP 4/ LOT 21	WILLIAM D BULAK
197 MOOSEHEAD LAKE RD	MAP 4/ LOT 25	COLIN D & RHONDA M AREY
183 MOOSEHEAD LAKE RD	MAP 4/ LOT 26	MARK MUZZY
179 MOOSEHEAD LAKE RD	MAP 4/ LOT 26A	MARK & CHERYL MUZZY
138 WASHINGTON ST	MAP 4/ LOT 32	SAMUEL & KIRSTEN DELRUSSO
MOOSEHEAD LAKE RD	MAP 4/ LOT 30D	FOUR SEASONS TRADING POST INC
EAST RD. (OFF)	MAP 5/ LOT 1	HILTON TIMBERLANDS, LLC
EAST RD. (OFF)	MAP 5/ LOT 3	HILTON TIMBERLANDS LLC
161 MOSSEHEAD LAKE RD	MAP 4/ LOT 28B	LUKE D MUZZY

Water Systems

The Project does not have any operational water demand. No water systems will be needed on-Site.

Sewage Disposal

The Project will not produce any sewage and does not include a subsurface waste disposal system.

Stormwater Management

The Project will not change stormwater drainage in a way that will adversely affect neighboring properties. The Maine Department of Environmental Protection (MDEP) does not consider solar panels to be an impervious surface. Solar panel racking is raised off the ground at least 36" and meadow conditions surrounding the array will serve as a vegetated stormwater buffer. The meadow conditions will allow for sufficient stormwater infiltration and there will not be a substantive difference from the stormwater handling capacity when compared to the existing condition of the Site. To meet meadow buffer treatment requirements, the Site will not be mowed more than two times per year.

Berry, Huff, McDonald, Milligan Inc. (BH2M) has filed a Stormwater Permit By Rule (PBR) application with MDEP for the Project. The Stormwater PBR application is included in **Appendix F**.

Public Water Supply

The Project is located approximately 2 miles from the Greenville public water supply. See **Appendix B**.

Proposed Construction

The Project Site Plan is located in **Appendix C**. The Project proposes solar panels that are mounted on fixed-tilt steel racking with foundation piles that are either driven or screwed into the ground. The maximum height of the installed solar panels is approximately 10', and the bottom edge of the solar panels

is raised approximately 36" off the ground to allow for vegetation maintenance and account for snowfall accumulation.

Equipment pads containing transformers and protective switch gear are located near the hammerhead within the fence. Overhead conductors on standard power poles will connect the Project to the existing 3-phase distributed electrical powerlines on Moosehead Lake Road. The utility will install its own protective equipment within the Site on a series of poles near the point of interconnection based on the approved interconnection design.

Fencing will be installed around the perimeter of the solar racking and equipment pads. An 8' agricultural style fence mounted on wooden posts is proposed and will fit with the rural character of the area. The fence will meet NEC (National Electric Code) requirements for enclosing a solar energy facility (minimum 7' tall fence). See **Appendix J** for representative images of this style of fencing.

A placard mounted listing the emergency contact information will be mounted on the gate providing 24/7 access to the system operator.

The Project does not propose the construction of any new streets, highways, easements, buildings, parks, recreation areas, open space areas, pedestrian walkways, parking/loading areas, or outdoor lighting. The location and width of the existing access road is displayed on the Site Plan, **Appendix C**.

Vegetative Screening

The Project is proposing vegetative screening that will be approximately 10'x150' in the northwest portion of the open field to the west of the Project area. The placement will merge with the existing vegetation running parallel to Moosehead Lake Road. Scrub-shrub type species (*Speckled Alder & Dogwood*) will be selected to match the existing vegetation and will not grow to more than 10' tall. See the Site Plan in **Appendix C** for the location of the vegetative screening area. The screening shall remain in place during the term of the lease unless further development or activities on the parcel outside of the lease area obscure visibility of the Project.

Operations and Maintenance

The site may be visited by a qualified technician approximately four times per year to monitor the Project and perform routine maintenance. In the event of a monitoring system alert, a technician may be sent to the site to ensure the equipment is operating correctly. As indicated above, the site will be mowed no more than twice per year.

Easements, Covenants & Deed Restrictions

There are no existing easements, covenants, or deed restrictions on the parcels this Project will occupy. The Project does not propose any new easements, covenants, or deed restrictions.

Erosion & Sedimentation Control

BH2M has written an Erosion and Sediment Control Inspection and Maintenance Plan (ESC Plan) for the Project that identifies temporary and long-term Best Management Practices (BMPs) and complies with MDEP Rule 06-096, Chapter 500: Stormwater Management. **Appendix F** includes the ESC Plan, a map of erosion and

sedimentation control measures during Project construction, and a map depicting the direction of existing surface water drainage across the Site.

Traffic

The Project entrance and access roads will utilize an existing access road off Moosehead Lake Road. During the operation of the project, vehicle access will be minimal. The Site will be visited by a technician approximately four times per year to monitor the Project and perform routine maintenance and mowing will take place no more than twice per year. The Project will not significantly increase the traffic volume along Moosehead Lake Road.

Solid Waste Disposal

During operation, the Project will not generate any solid waste that would require disposal.

Decommissioning Plan

The Project will be decommissioned at the end of its useful life or as required by the lease agreement. Once the Project is to be decommissioned, Greenville CSG LLC will be responsible to remove the solar facility from the Site within one year of the end of useful life. Please see **Appendix G** for a detailed Decommissioning Plan.

Prior to construction, the Project will provide an acceptable form of surety which shall include a provision granting the Town of Greenville the ability to access the funds and property and perform the decommissioning if the Project is abandoned or the Project or subsequent responsible party fails to meet their obligations after reasonable notice.

Preliminary Construction Schedule

Construction is anticipated to begin in April 2021 and finish in September 2021. See **Appendix H** for the preliminary construction schedule that outlines the major construction milestone.

Project Location Images

Images of the existing conditions of the Site are included in **Appendix I**.

Representative Images

Images of representative solar arrays similar to the proposed Project are included in **Appendix J**.

Title, Right, or Interest

Greenville CSG LLC holds a Ground Lease Agreement with the landowner for use of the property as a solar facility. The lease term is (20) years with two (5) year optional extensions. A redacted version is included in **Appendix K**.

Tangible Benefit

Distributed generation solar projects are relatively new to Maine, and the topic of assessing personal property tax on these unique assets is an active and unresolved discussion happening at multiple levels within the state government. Currently, solar projects like this one are deemed to be tax exempt and the town can be reimbursed by the state up to 50% of the assessed value of the solar project. The challenge with this program

is that an approved, consistent method of assessment is not available to appointed town assessors that would determine the value of asset. Furthermore, there is speculation that there are not enough funds set aside by the state to reimburse towns for 50% of the appraised value because there are far more projects being developed than anticipated. Again, this is new for Maine, and it will take time to solicit feedback from legislators, the Maine Municipal Association, industry groups like Maine Renewable Energy Association, town representatives, and landowners.

In lieu of the uncertainty surrounding the final taxation rules and guidelines and the inevitable delays with that process, Dimension wants to step up and guarantee an annual tangible benefit to the Town of Greenville of \$2,000 per MW AC. This commitment will be met even if the state process results in a lower personal property tax payment to the town. The size of the proposed solar project is 4.25 MW AC, resulting in an annual tangible benefit of \$8,500 each year for the duration of the lease term (20 years = \$170,000). If state regulations require a higher municipal payment to occur, the Project will comply.