



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 29, 2020

Lee D. Hoffman, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702

RE: **PETITION NO. 1347A** - GRE GACRUX LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 16.78-megawatt AC solar photovoltaic electric generating facility located at 117 Oil Mill Road and associated electrical interconnection to Eversource Energy's existing substation at 325 Waterford Parkway North in Waterford, Connecticut. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b).

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than June 11, 2020. To help expedite the Council's review, please file individual responses as soon as they are available. At this time, consistent with the Council's policy to prevent the spread of Coronavirus, please submit an electronic copy only to siting.council@ct.gov. However, please be advised that the Council may later request one or more hard copies for records retention purposes.

Copies of your responses shall be provided to all parties and intervenors listed on the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

s/Melanie A. Bachman

Melanie A. Bachman
Executive Director

c: Parties and Intervenors

Petition No. 1347A
GRE GACRUX LLC – Waterford

Interrogatories- Set Two
May 29, 2020

32. Referring to the response to Council interrogatory #28,
- a) Was a minimum distance from the solar array to steep slopes specified by the DEEP Stormwater Division?
 - b) What is considered a steep slope in relation to the project redesign?
 - c) What is the approximate distance of the reconfigured solar array to steep slopes?
 - d) Why was the solar array pulled back from some of the steep slopes rather than all of the steep slopes?
 - e) For site regrading, how is “*to the extent practicable*” defined? Is it possible to regrade all slopes to less than 15%?
33. Referring to Site Detail Sheet 6.2,
- a) Sediment Trap Cross Section and Permanent Stormwater Basin details, clarify where the geotextile fabric will be installed. Will the proposed riprap armoring be placed on top of the erosion control blankets? If so, how are these two control features compatible?
 - b) Provide a side profile of the rip rap lined swales.
 - c) Do any of the proposed swales have rip rap or other features to reduce water velocity? If so, at what slope/spacing interval?
34. What construction methods will be used to stabilize the temporary sediment basins to avoid potential erosion issues at the spillway and basins side slopes in the event of extreme weather events that exceed the capacity of the basins?
35. Referring to the response to Council interrogatory #4 and Petition p. 10, provide a detail of the wood chip berm. Is the intent to surround the entire Project Limit with the wood chip berm, including downgradient of basin outflows that have E-Fence? Would wood chips be imported into the site, if necessary, to complete the berms?
36. Referring to GRE’s response to Town of Waterford question #18, does the petitioner intend to use the solar field as pasture for livestock with ground cover specific to grazing? Would grazing potentially preclude or compete with the establishment of pollinator ground cover habitat?
37. If the solar field will not be used for grazing, would the Petitioner be willing to adhere to the UMASS CLEAN Energy Extension’s Best Management Practices document to the extent practicable to establish and maintain pollinator friendly ground cover within the solar field area?
38. Site Plan C-5.0 – Construction sequence note #2 states a 3 inch minimum topsoil depth is required for regraded areas. What minimum topsoil depth is specified for other areas of the site? Will topsoil be imported into the site prior to final seeding to ensure proper soil depth within the solar field areas?
39. Site Plan C-1 – Erosion control note #6, Site Plan C-5.0 – Construction sequence note #2, and the call out notes on Site Plans C-5.6, C-5.7, C-5.8, and C-5.11 all contain different time periods for site stabilization and seeding (72 hours, 10 days and 14 days). Please clarify what time interval will be used upon completion of construction in a specific area.

40. Do any of the sediment/permanent stormwater basins qualify as dams under DEEP's Dam Safety Program?
41. Referring to GRE's response to STRSTH question #19, a "wet season" is described. Please describe the wet season and the expected duration of wet season water ponding in Stormwater Basins #1, #4, #6, #9, #11, #12, and #16.
42. What is the distance of Stormwater Basin #1 and #16 to Vernal Pool 3? Is it possible that these basins would act as decoy pools for vernal pool species that were documented in Vernal Pool 3? Can the basins be altered to reduce or eliminate wet season water ponding?
43. Referring to GRE's response to STRSTH question #5, what areas of the solar field are within 200 feet of an on-site wetland? If the panels are removed from these areas, would they be relocated to other areas of the site? If the panels are not re-located and permanently removed, how would the output of the facility be affected?
44. Referring to GRE's response to STRSTH question #12, describe the stable settling medium to be installed within the pond detention basins.
45. Referring to GRE's responses to STRSTH questions #23, provide a side profile detail of the pretreatment areas for the sand filter basins.
46. In its responses to STRSTH's questions #26 & #27, GRE states it would modify the design details of Basins #3, #5, and #10 "if the Council so desires." Would this design detail be reviewed by the DEEP Stormwater Division prior to the issuance of EITHER an Individual Permit or a General Permit? Has GRE had a discussion with DEEP regarding the design detail?
47. Referring to the Stormwater Report -Appendix C – Erosion and Sedimentation Control Checklist,
 - a) Construction Practices list - no Best Management Practices are included for either the E-Fence or wood chip mulch berm. Please clarify and provide detail.
 - b) Long Term Practices list states "Inspect monthly for the first 3 months and after any rain event exceeding 0.5". Inspect 2x per year thereafter." When does the 3 month period begin? Why was a 3 month period chosen for more frequent inspections?
48. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identifies the locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);

8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.