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May 11, 2020

VIA ELECTRONIC MAIL

Melanie Bachman
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: PETITION NO. 1385 – Cobb Road LLC declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.95-megawatt AC solar photovoltaic electric generating facility on approximately 11.16 acres located at 20-1 Short Hills Road, Old Lyme, Connecticut and associated electrical interconnections.

Dear Ms. Bachman:

I am writing on behalf of my client, Cobb Road LLC (“Cobb Road”), in connection with the above-referenced Petition. With this letter, I am enclosing Cobb Road’s Responses to the Connecticut Siting Council’s Partial D&M Plan Interrogatories, dated May 11, 2020.

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been made to all parties on the Petition’s service list.

Sincerely,



Lee D. Hoffman

Enclosure

**Petition No. 1385
Cobb Road, LLC
20-1 Short Hills Road, Old Lyme
Partial D&M Plan
Responses to Interrogatories**

May 11, 2020

1. On the cover page of the May 8, 2020 partial Development and Management Plan (Partial D&M Plan), Cobb Road, LLC (CR) notes that vegetative cover would be established before constructing the posts, racking, and other equipment. Would the future installation of the posts, racking and other equipment disturb the established vegetative cover? If yes, how would CR mitigate such effects?

Answer:

The initial vegetative cover that is contemplated in the Partial D&M Plan is being established as a temporary erosion control method to stabilize the site prior to construction. As the Council is well aware, the Project could use other methods of temporary site stabilization (such as erosion control blankets, tackifier, etc.) for temporary stabilization methods. The future installations of the posts, racking and other equipment could disturb the contemplated initial vegetative cover referenced in the Partial D&M Plan. Any areas that are disturbed during those future construction activities will be reseeded as part of the final post-construction seeding and/or otherwise stabilized in compliance with the DEEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (General Permit) and applicable DEEP guidance documents, including Appendix I.

2. Page 3 of the Partial D&M Plan states, "Once vegetative cover is planted, the plan is for Cobb Road to cease construction activities at the Project Site and allow the vegetative cover time to establish itself." Approximately how long would CR leave the vegetative cover in place to establish prior to additional construction activities?

Answer:

Currently CR is allowing for 30 days for the vegetative cover to establish prior to starting additional construction activities. If temporary stabilization of the site has not occurred within that time, CR will ascertain whether it will use other temporary stabilization methods (such as the installation of blankets and/or tackifier), or whether it will allow for a longer period of time for the establishment of the vegetative cover. In no event will the Project move forward to a later stage of construction until: 1) the Project site is temporarily stabilized in accordance with the General Permit and applicable guidance issued by DEEP; and 2) the next phase of construction is addressed in a D&M Plan that has been approved by the Council.

3. Would the erosion and sedimentation control plans identified in Sheet Nos. EC-1 through EC-4 be implemented as part of the Partial D&M Plan?

Answer:

Yes, the erosion and sedimentation control plans identified in Sheet Nos. EC-1 through EC-4 will be implemented as part of the Partial D&M Plan. In addition, CR will comply with the General Permit and applicable guidance as noted above.

4. Is construction of the gravel access drive considered part of the civil work for the Partial D&M Plan?

Answer:

Yes, the construction of the gravel access drive is considered part of the civil work for the Partial D&M Plan.

5. Is the proposed fence installation part of the Partial D&M Plan?

Answer:

The proposed fence is not part of the Partial D&M Plan at this time. The location of the fence will be finalized with final site plan, along with other elements including: the solar panel layout, electrical interconnection, and equipment pads. This information will be submitted to the Council for the Council's approval in another D&M Plan filing at a later date.