

June 1, 2020

*Via Electronic Mail*

Ms. Melanie Bachman, Esq.  
Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

Re: ***Petition 1397*** – Constitution Solar, 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 20-megawatt AC solar photovoltaic electric generating facility on approximately 149 acres comprised of four separate parcels located off of Cornell Road in Plainfield, Connecticut and associated electrical interconnection – ***Response to Council Interrogatory 52***

Dear Ms. Bachman:

On behalf of the petitioner, Constitution Solar, LLC, enclosed please find an electronic copy of the Petitioner's Responses to Siting Council Interrogatory 52 issued in the above-referenced proceeding.

Please feel free to contact David Bogan of this office (860-541-7711) or me should you have any questions regarding this submission.

Very truly yours,



Kathryn E. Boucher

**Petition No. 1397**

**Constitution Solar's Response to Connecticut Siting Council Interrogatories**

**Set One- Response to Interrogatory 52**

**June 1, 2020**

52. 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.

**Company's Response:**

The attached photographic field review is comprised of photos taken during several years of ecological studies conducted on the site of the proposed Constitution Solar Project, including recent photos taken in May 2020. Two figures provide a comprehensive digital review of the proposed Project, and an aerial image is included for a more detailed view of existing conditions at the site. Additionally, a photographic summary table is provided for reference.

The individual photographs orient the viewer relative to the Project site, including existing and proposed features. Some photographs give a graphic representation of responses provided in other interrogatories to the extent applicable. Additionally, Petition Exhibit C, Environmental Site Conditions Report, contains several technical reports that include additional representative site photographs.

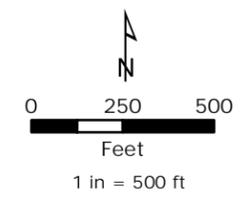
The comprehensive photographic field review, along with the Petition and previous interrogatory responses, is evidence that the proposed Project will not create any adverse environmental effects, particularly with the stormwater control measures and other mitigation measures proposed by the Petitioner.



PHOTOGRAPH LOCATIONS

- ① Photo Location and Number
- Limit of Work/Development Area
- Project Site
- Chain Link Fence
- Vegetative Screening
- Stormwater Basin
- 50-foot Buffer Zone
- 100-foot Buffer Zone
- 100' Vernal Pool Envelope
- 2-foot Contour
- Watercourse
- Wetland Boundary
- 100-Year Floodplain
- Panels
- Wetland Area
- Equipment Pad
- Vernal Pool
- Switchyard
- Road
- CT Municipal Boundary

LOCUS MAP



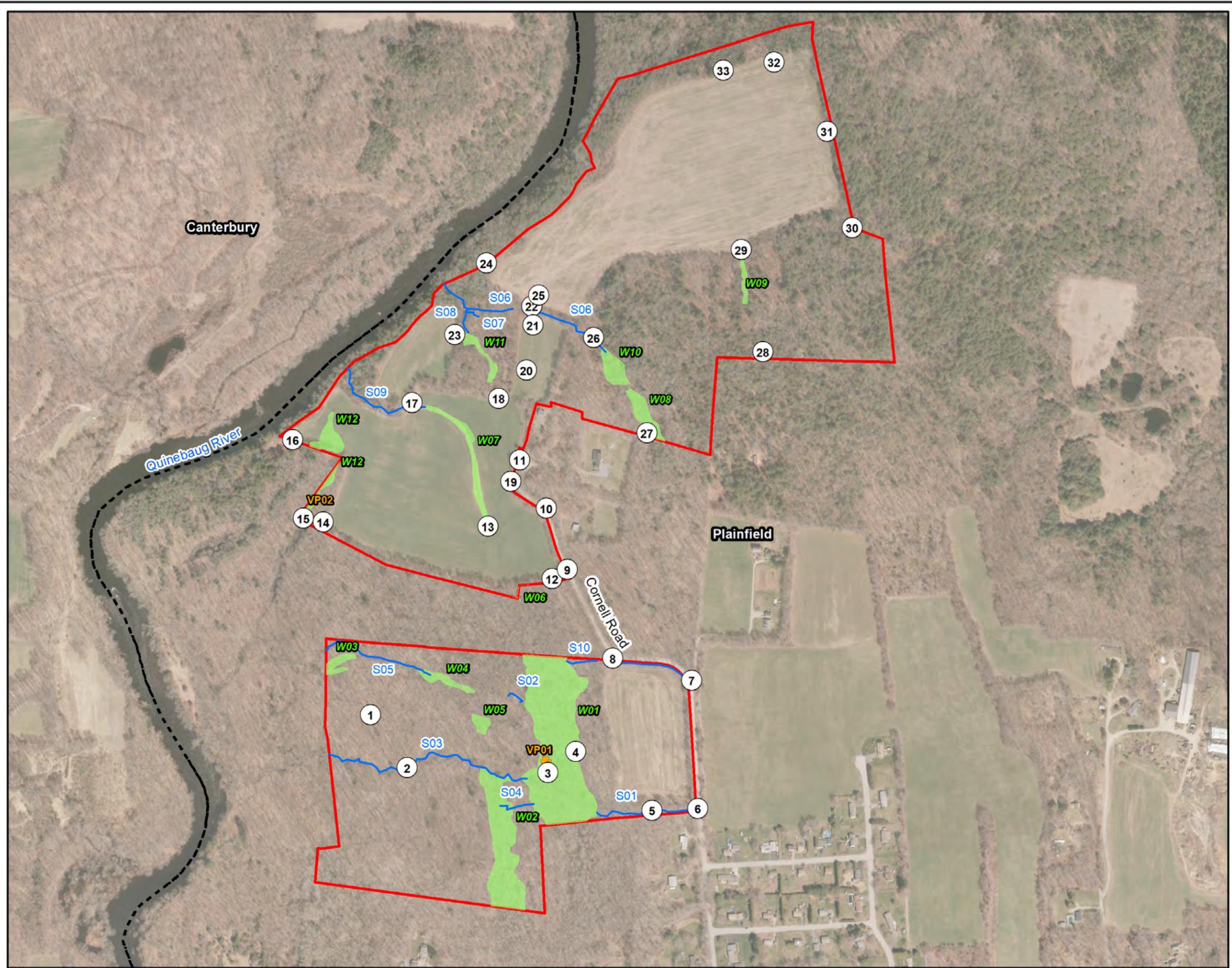
NOTES

1. Based on 2019 Statewide Orthophotography, Courtesy of CTECO.

Constitution Solar Plainfield, Connecticut

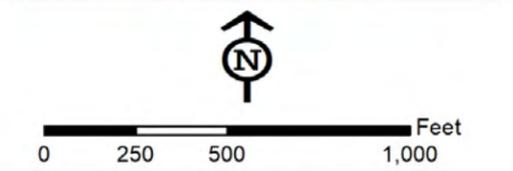
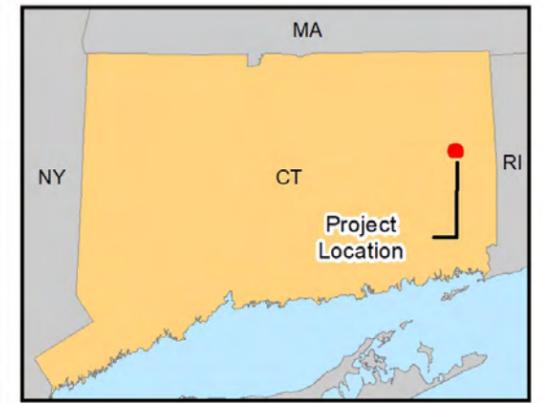
June 2020

**Tighe & Bond**  
Engineers | Environmental Specialists



**Legend**

- Study Area
- Township Boundary
- Vernal Pool
- Delineated Wetland
- Watercourse
- Photographic Location



**Photographic Locations  
Constitution Solar  
Plainfield, Connecticut**

Prepared For: **NEXTERA ENERGY RESOURCES**

Prepared By: **TETRA TECH**      Date: **05/2020**

Source: Esri, et. al., 2016; NextEra, 2019; DEEP, 2017b

Coordinate System: North American Datum, 1983  
Universal Transverse Mercator, Zone 19 North

## Constitution Solar Photo Log

### Summary Table

Photo Number	Features	Comments
1	Forested upland area	Photo is within the designated preservation area. This portion of the Project will not be developed.
2	Stream S03	Intermittent stream flows west out of a wetland complex and toward the Quinebaug River within the Project's preservation area.
3	Vernal Pool VP01	Cryptic vernal pool located in the forested wetland in the southern Project parcel.
4	Wetland W01	Representative photo of Wetland W01. No clearing proposed within 100-feet of this resource.
5	Stream S01	Typical stream flows west into Wetland W01 from culvert in Cornell Road.
6	6A - access road 6B - Cornell Road 6C - 65 Cornell Road	Existing access to Array 3 will be used for Project access from Cornell Road. The driveway to 65 Cornell Road occurs south of the proposed access on the same side of the road. See response to interrogatory 16.
7	Driveway to 98 Cornell Road	This driveway occurs opposite of Array 3 where Cornell Road turns to the west.
8	8A- Cornell Road, east 8B - Cornell Road, north	Photo 8A shows the view facing east at the corner where Cornell Road turns to the north. Proposed Array 3 is visible. Photo point 8B shows the view from the same point facing north.
9	Proposed access to northern array areas	Facing west from Cornell Road, this is the location of the proposed curb cut and access point to the Project's northern array area.
10	146 Cornell Road	View of Cornell Road and neighboring property, 146 Cornell Road, across from the proposed array area.
11	11A - 150 Cornell Road 11B - 155 Cornell Road 11C - Proposed array area	View of properties at the end of Cornell Road and a view of the array area from the same location in leaf-off conditions.
12	Proposed switchyard and site road	Proposed location of Project switchyard and internal site road.

<b>Photo Number</b>	<b>Features</b>	<b>Comments</b>
13	Wetland W07	This wetland bisects the field in the southern portion of the northern Project parcel, eventually flows into Stream S09.
14	14A - Proposed array and forest edge 14B - Vernal pool VP02	From the southwest corner of the northern Project array area (Array 2), two photos show the edge of the field/proposed array area and vernal pool VP02.
15	Vernal Pool VP02	Looking south, this vernal pool extends off of the Project site.
16	Wetland W12 and proposed Array 2	The meadow portion of Wetland W12 is visible in the center of the photo, Array 2 is in the background. This photo shows one of the acoustic bat detectors used for the bat survey.
17	Stream S09	Looking upstream from an old farm road. Wetland W07 occurs in the background along with proposed array areas.
18	18A - Proposed array area 18B - Array 2	Two photos along an old farm road in the center of the site. The Proposed array area is to the right of Photo point 18A and in the foreground of Photo point 18B.
19	Proposed site road	Proposed site road, looking north toward Photo point 18.
20	Proposed array area	Looking toward 155 Cornell Road from the northern portion of Array 2.
21	21A - Proposed array 21B - Proposed site road	Proposed array areas including the northern portion of Array 2 in Photo point 21A and southern portion in Photo point 21B. Photo point 21B shows location of proposed site road near Stream S06.
22	Proposed site road	Close up photo of the proposed site road and Stream S06.
23	Proposed array area	This photo shows the proposed array area that is closest to the Quinebaug River. The array will be constructed within the existing clearing.
24	Quinebaug River	Looking downslope to the Quinebaug River from the southwest corner of Array 1.
25	Proposed array area	Southern end of proposed Array 1 looking east along the proposed site road.
26	Proposed site road	Looking east along proposed site road in southern portion of Array 1.
27	Wetland W08	Forested wetland with dense understory of shrubs, this wetland flows west toward Wetland W10 and eventually into Stream S06.
28	Property boundary	Photo shows the stone wall marking the property line. The site road is proposed within this area as well. The photo also is representative of the forested upland area within the northern array area.

Photo Number	Features	Comments
29	Wetland W09	Looking upslope at Wetland W09. The wetland forms as a seep in a gently sloping portion of the site.
30	Proposed stormwater basin	Location of proposed stormwater basin. Photo also is representative of the forested upland in this portion of the site.
31	Proposed stormwater basin	Location of proposed stormwater basin within existing agricultural field.
32	Proposed array area	Proposed Array 1, photo shows the gently sloping terrain in this area.
33	Proposed site road	Proposed site road and inverter locations within Array 1.



Photo Number	Feature	Direction	Notes
1	Upland area	East	Upland area not to be developed in southern Project parcel. This area will be set aside as a preservation area for the life of the Project.



Stream flags

Photo Number	Feature	Direction	Notes
2	Stream S03	East/Upstream	Intermittent Stream S03 flows west toward Quinebaug River. Blue flags mark stream channel.



Photo Number	Feature	Direction	Notes
3	Vernal Pool VP01	Northwest	Cryptic Vernal Pool VP01, within Wetland W01.



Photo Number	Feature	Direction	Notes
4	Wetland W01	West	Large forested Wetland W01, in southern Project parcel that is part of preservation area.

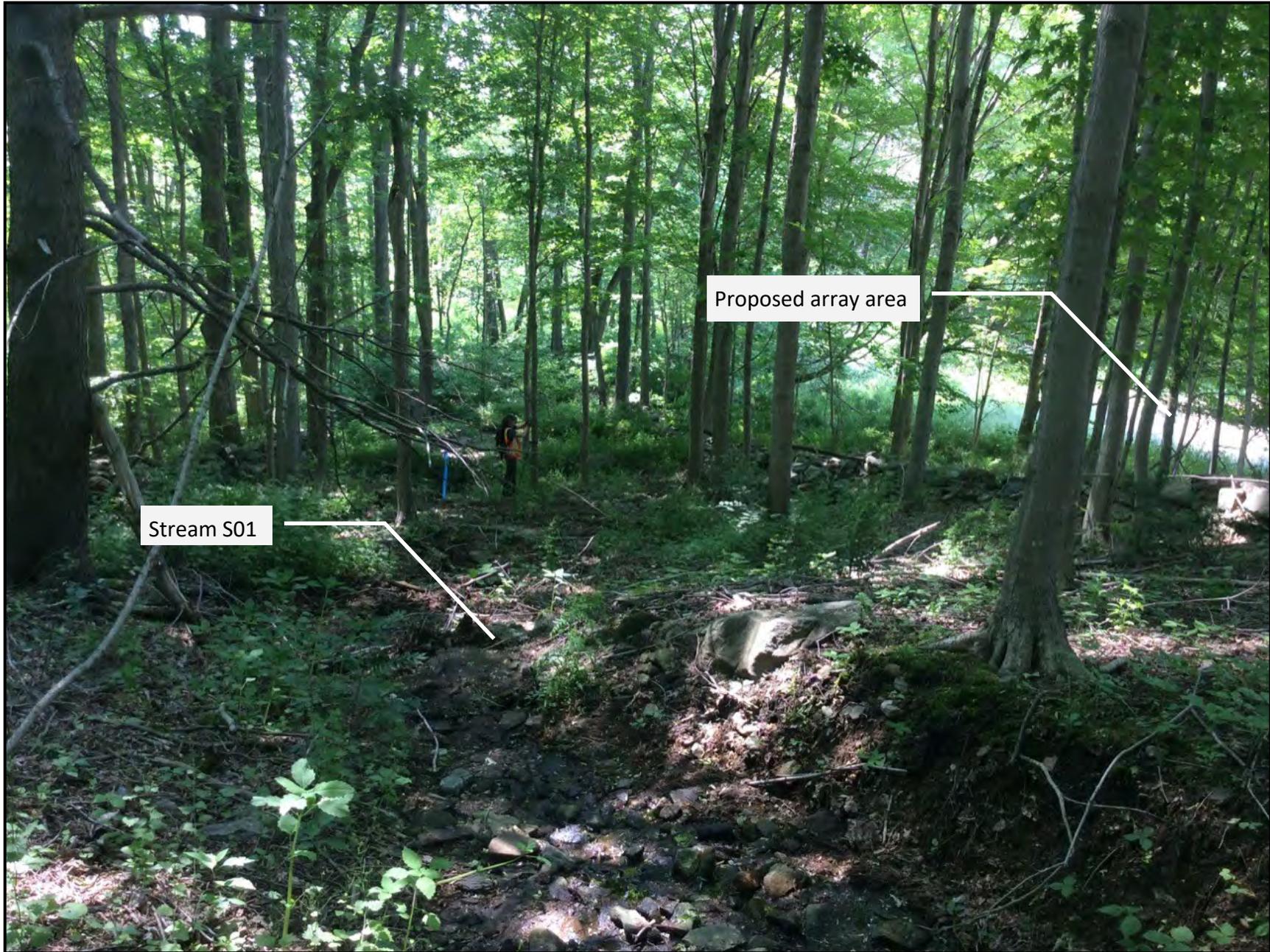


Photo Number	Feature	Direction	Notes
5	Stream S01	West/ Downstream	Intermittent Stream S01 flows west into Wetland W01 along south side of proposed array area.

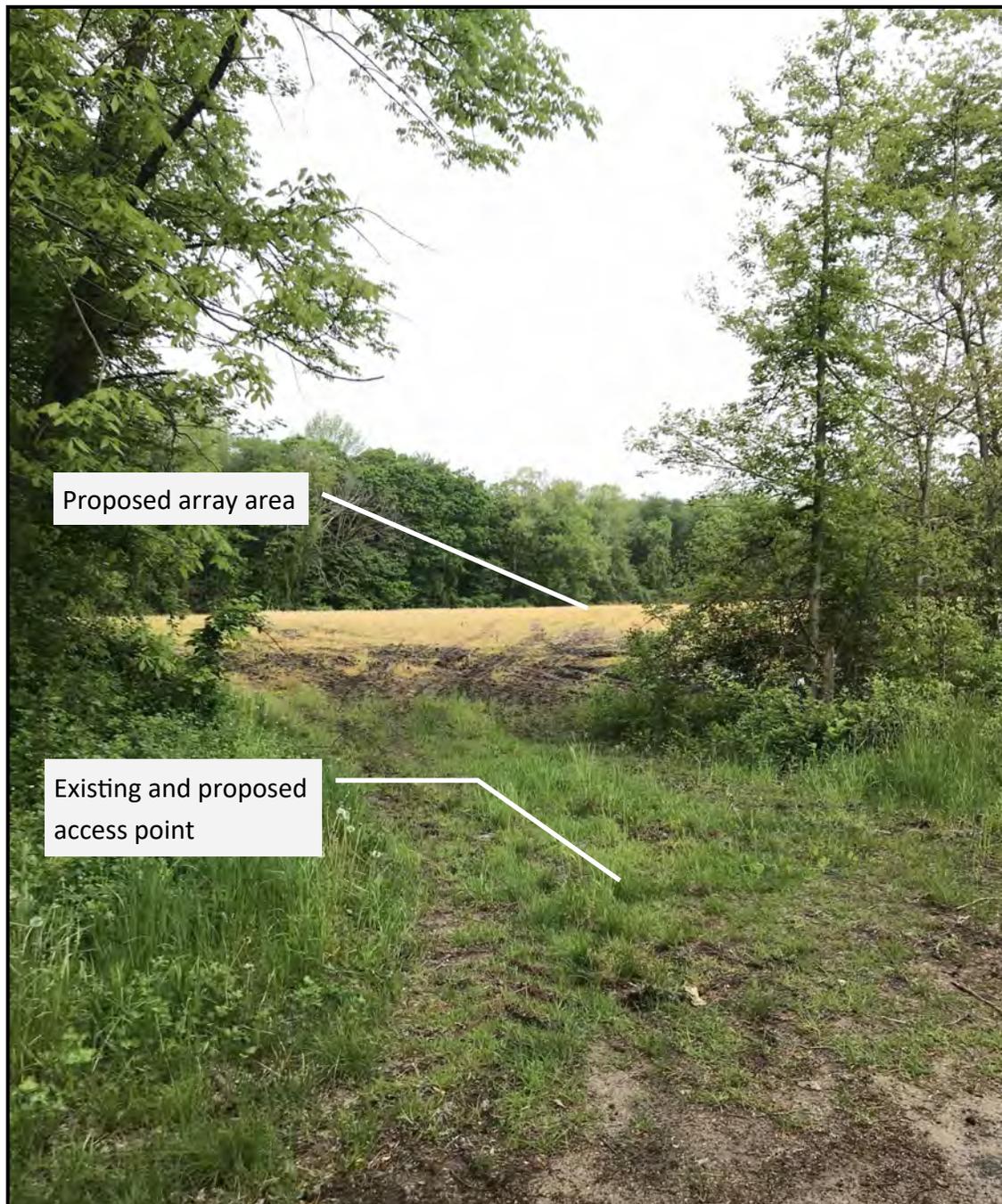


Photo Number	Feature	Direction	Notes
6A	Array 3 and access road	Northwest	Existing and proposed access to proposed array area. Photograph taken from Cornell Road.



Photo Number	Feature	Direction	Notes
6B	Cornell Road	North	Existing and proposed access to proposed array area on left side of photo facing down Cornell Road.



Photo Number	Feature	Direction	Notes
6C	Existing house	Southwest	Driveway to 65 Cornell Road (parcel ID 79-5) just south of the southern proposed array area. <i>See</i> response to interrogatory 16.



Driveway to 98 and  
100 Cornell Road

Photo Number	Feature	Direction	Notes
7	Driveway	North	Driveway to 98 and 100 Cornell Road (parcel ID 78-97A and 78-97, respectively) across from proposed array area.



Photo Number	Feature	Direction	Notes
8A	Cornell Road	East	Looking east on Cornell Road north of Stream S10 and proposed array area for Array 3.

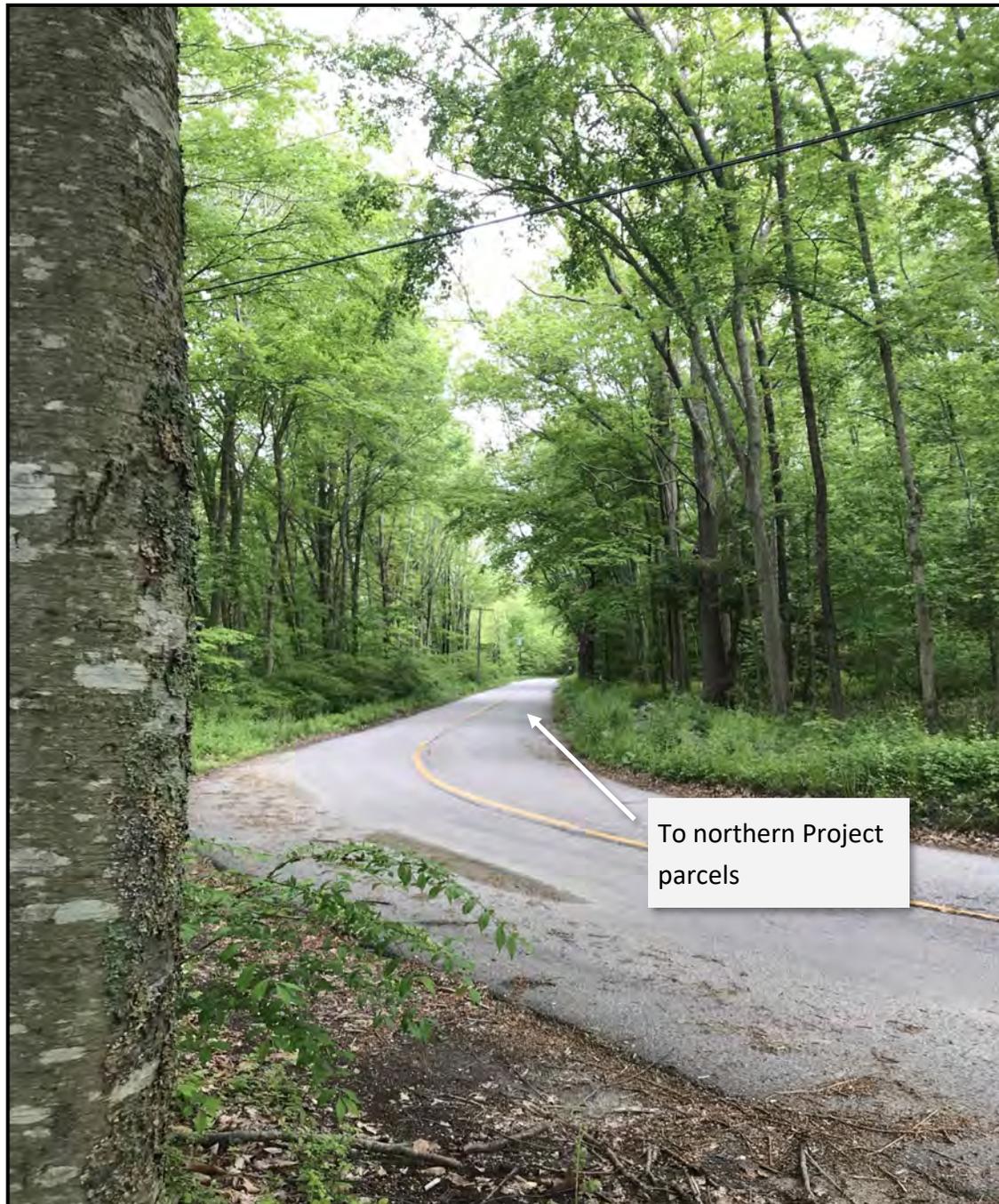


Photo Number	Feature	Direction	Notes
8B	Cornell Road	Northwest	Facing northwest from southern Project parcel. Location of buried collection line.



Proposed access point

Photo Number	Feature	Direction	Notes
9	Proposed access point	West	Proposed curb cut for Project access from Cornell Road to the northern Project parcels.



Photo Number	Feature	Direction	Notes
10	146 Cornell Road	Southeast	Facing 146 Cornell Road (parcel ID 78-103), the proposed array area is off the photo to the right.



Driveway to 150  
Cornell Rd

Photo Number	Feature	Direction	Notes
11A	150 Cornell Road	East	Facing 150 Cornell Road (parcel ID 78-100) from the cul-de-sac at the end of the road.



Photo Number	Feature	Direction	Notes
11B	155 Cornell Road	North	Facing 155 Cornell Road (parcel ID 78-105) from the cul-de-sac at the end of the road.



Photo Number	Feature	Direction	Notes
11C	Proposed array from Cornell Rd	West	Looking out to proposed Array 2 from the end of Cornell Road. Mailbox for 155 Cornell Road visible on right side of photo.

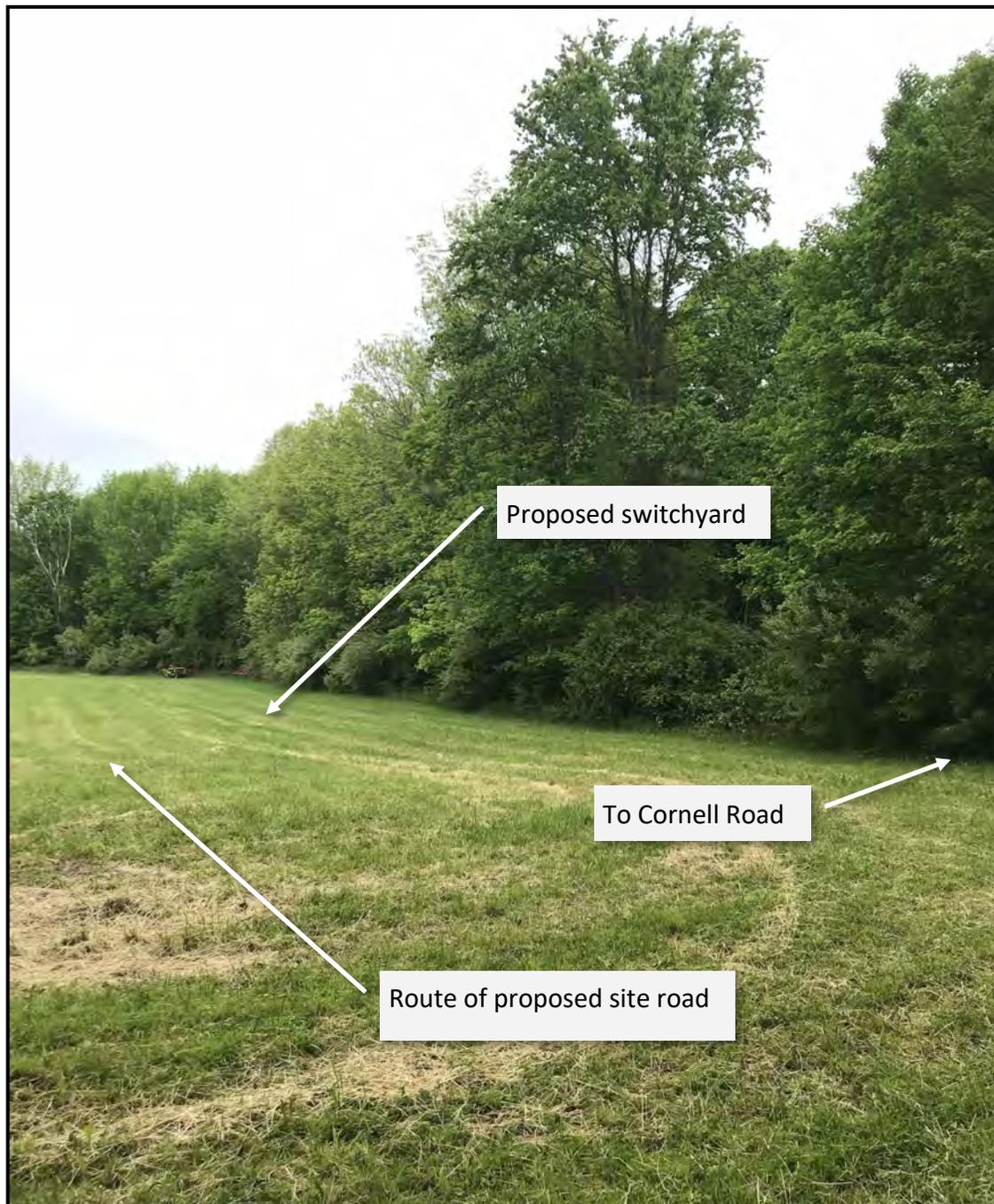


Photo Number	Feature	Direction	Notes
12	Proposed switchyard	North	Approximate location of proposed site road and switchyard.



Photo Number	Feature	Direction	Notes
13	Wetland W07	North	Wet meadow, Wetland W07 is visible as the green vegetation in the center of the photograph. The proposed access to northern array in background.

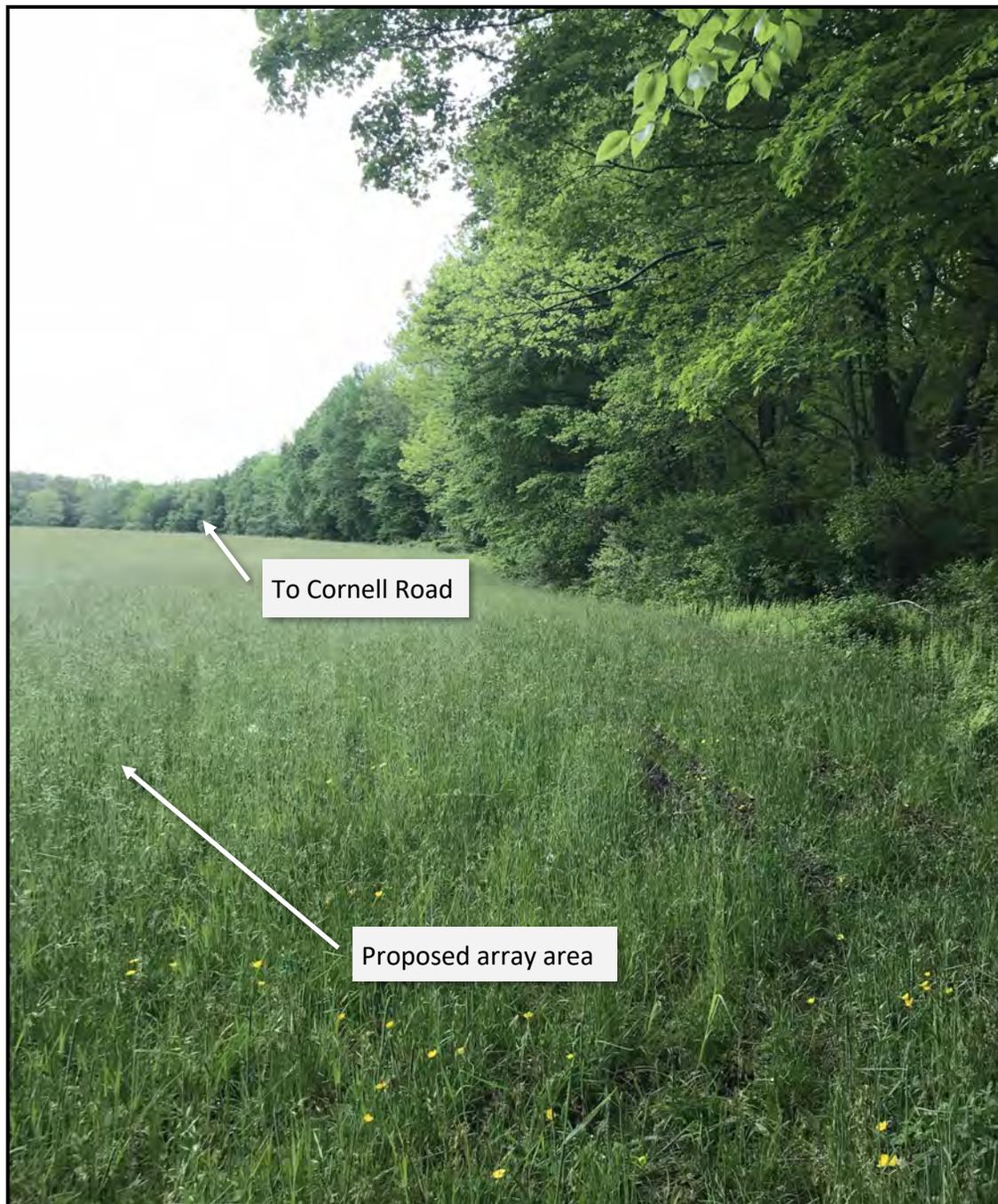


Photo Number	Feature	Direction	Notes
14A	Proposed array	Southeast	Edge of field within proposed Array 2 area, no clearing is proposed in this area within the critical terrestrial habitat of Vernal Pool VP02.



Vernal Pool VP02

Photo Number	Feature	Direction	Notes
14B	Vernal Pool VP02	Northwest	Facing toward Vernal Pool VP02 from the edge of the field. No clearing proposed within this area.



Photo Number	Feature	Direction	Notes
15	Vernal Pool VP02	South	Natural Vernal Pool VP02, formed in old oxbow of the Quinebaug River, extends outside of the Study Area to the south.

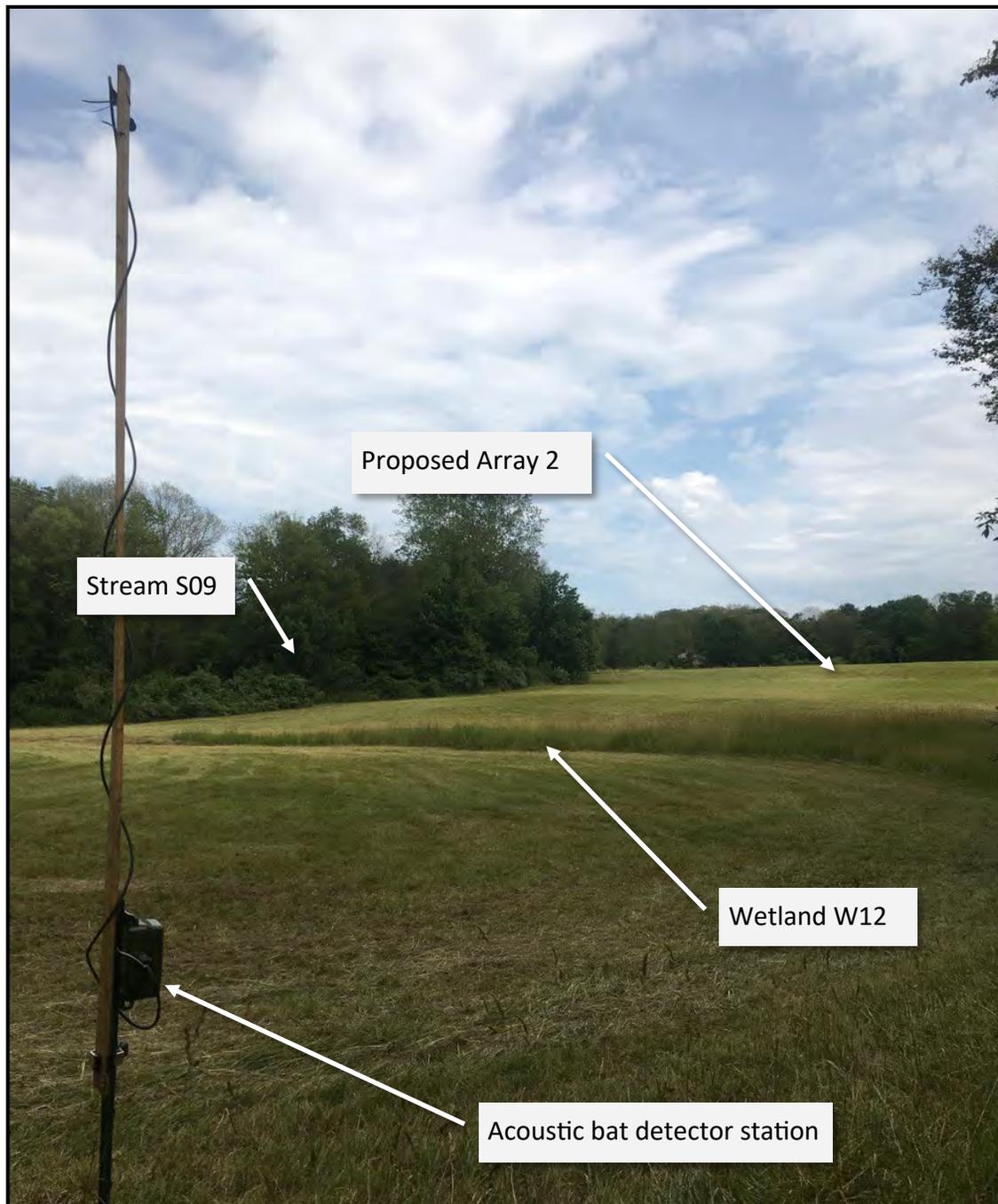


Photo Number	Feature	Direction	Notes
16	Wetland W12	Northeast	Facing northeast across Wetland W12 toward Array 2 in background. Acoustic bat detector station visible in foreground.



Photo Number	Feature	Direction	Notes
17	Stream S09	East	Facing upstream from an old farm road that crosses Stream S09. Arrays are proposed in the field on either side of the stream in the background.



Photo Number	Feature	Direction	Notes
18A	Proposed array	East	Facing east toward a proposed array area from an existing farm road.

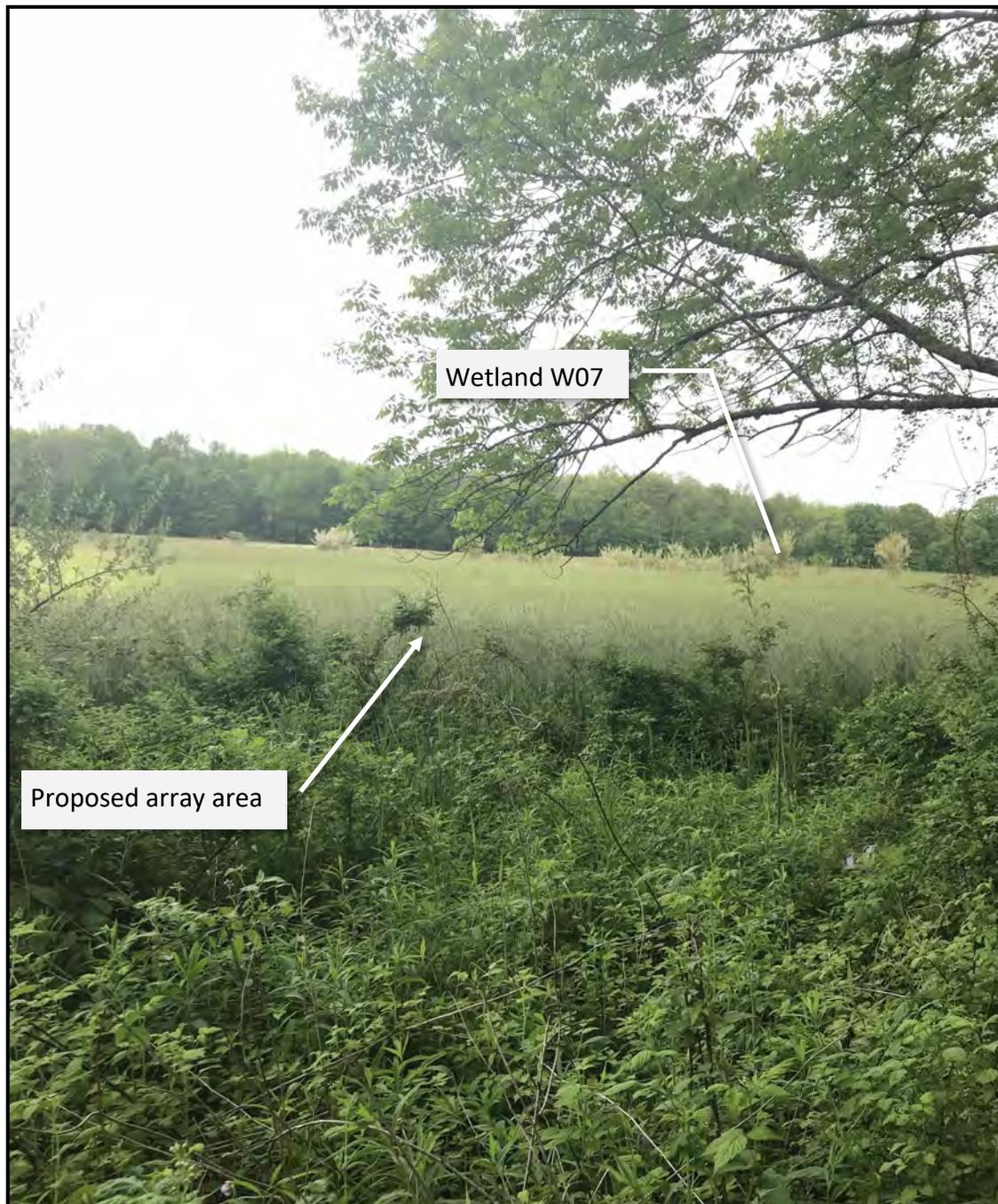


Photo Number	Feature	Direction	Notes
18B	Proposed array	South	Facing south from existing farm road toward proposed array area, shrubs present in Wetland W07 are visible in the background.

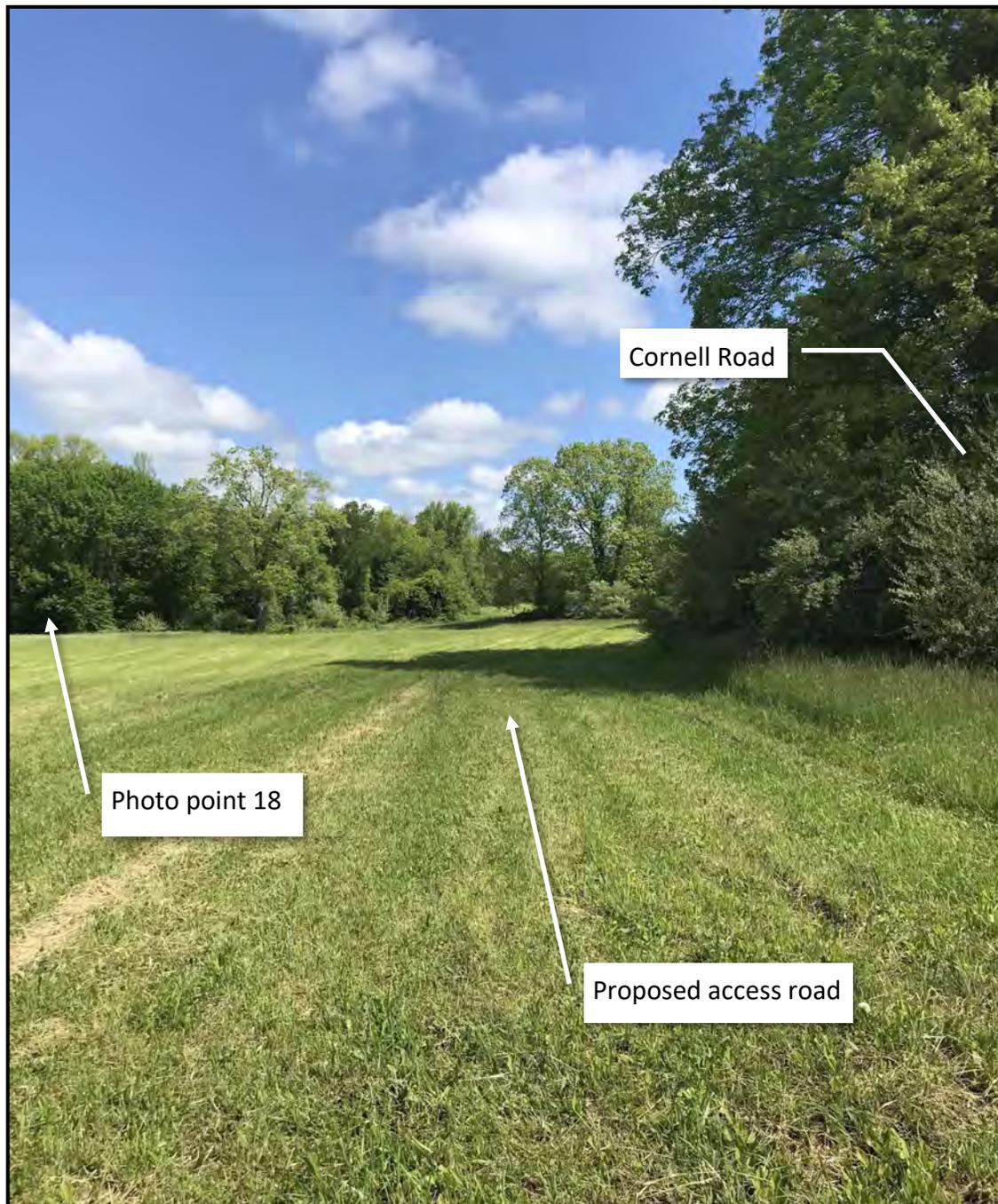


Photo Number	Feature	Direction	Notes
19	Proposed site road and array area	Northeast	Looking northeast along the proposed site road within Array 2, looking towards approximate location of Photo points 18A and 18B.



Photo Number	Feature	Direction	Notes
20	Proposed array with house	South	Looking across proposed Array 2 toward the end of Cornell Road.



Photo Number	Feature	Direction	Notes
21A	Proposed array	South	Looking south across Array 2. There is some clearing proposed along the edge of the woods in this location. See interrogatory 40.



Photo Number	Feature	Direction	Notes
21B	Proposed access road	North	Looking toward Stream S06 and the existing farm road that is the location of the proposed road to Array 1 in the background.



Photo Number	Feature	Direction	Notes
22	Proposed access road	North	Closer view of existing farm road/proposed access road, Stream S06 and proposed Array 1 in the background.



Photo Number	Feature	Direction	Notes
23	Proposed array	Southwest	Proposed array area north of Stream S09 and closest point of Project development area to the Quinebaug River.



Photo Number	Feature	Direction	Notes
24	Quinebaug River	Northwest	Looking downslope toward the Quinebaug River from the southwest corner of Array 1.

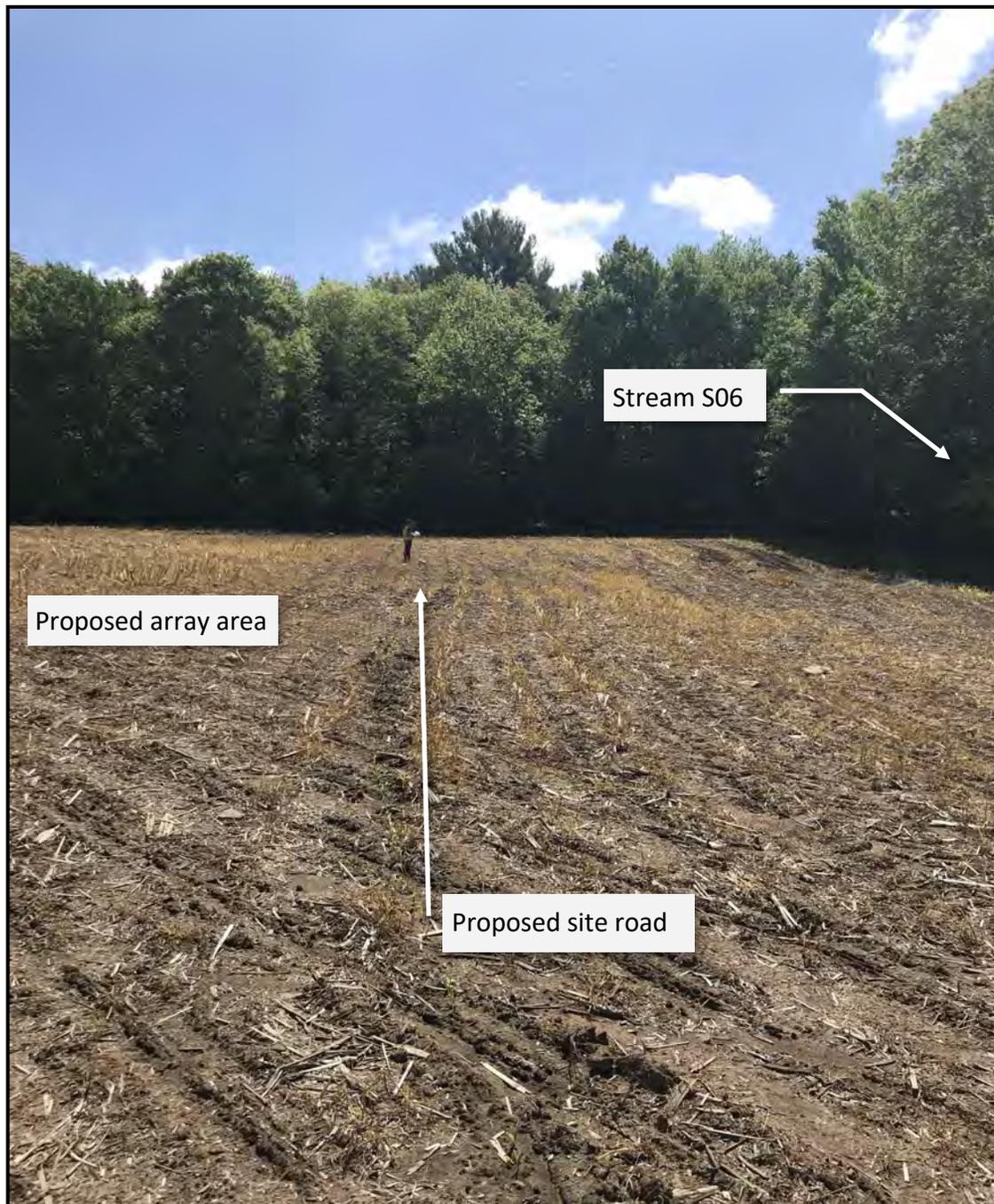


Photo Number	Feature	Direction	Notes
25	Proposed road	East	Proposed site road within Array 1. Stream S06 occurs in the forested area on the right side of the photo.



Photo Number	Feature	Direction	Notes
26	Stream S06	West/ Downstream	Looking downstream along Stream S06 flowing out of braided channels in Wetland W10. Proposed Array 1 visible in the background.



Photo Number	Feature	Direction	Notes
27	Wetland W08	North	Forested Wetland W08 facing north from the property line. No clearing is proposed within 100-feet of this resource.



Photo Number	Feature	Direction	Notes
28	Property line, proposed site road	Southwest	Forested upland area along property line and proposed site road in the northern project parcel.



Photo Number	Feature	Direction	Notes
29	Wetland W09	South/Upslope	Wetland W09 occurs in a seep on a gently sloping area within the forested section of proposed Array 1.



Photo Number	Feature	Direction	Notes
30	Proposed	Southeast	Location of proposed permanent stormwater basin in forested upland area along the northern Project boundary.



Proposed stormwater basin

Photo Number	Feature	Direction	Notes
31	Proposed	South	Location of proposed permanent stormwater basin in agricultural area along the Project boundary.



Photo Number	Feature	Direction	Notes
32	Proposed array	Southwest	Image shows area of proposed Array 1, the Quinebaug River occurs downslope to the right of the image.



Photo Number	Feature	Direction	Notes
33	Proposed site road and inverter pads	South	Location of proposed site road within Array 1. Inverter pads will be located adjacent to road.