

**WATERTOWN SOLAR ONE, LLC  
AND  
VCP, LLC D/B/A VEROGY**

**PETITION FOR A DECLARATORY RULING THAT A CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED IS NOT REQUIRED FOR  
THE CONSTRUCTION, OPERATION AND MAINTENANCE OF A 1.975 MWAC  
SOLAR PHOTOVOLTAIC PROJECT AT 669 PLATT ROAD, WATERTOWN,  
CONNECTICUT**

**JULY 6, 2020**

**VEROGY**

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## **EXHIBITS**

Exhibit A – Detailed Project Development Plans

Exhibit B – Decommissioning Plan

Exhibit C – Public Outreach Information and Neighborhood Meeting Summary

Exhibit D – Abutting Property Owner List and Sample Notice Letter

Exhibit E – List of Municipal Officials and Government Agencies and Sample Notice Letter

Exhibit F – Operations and Maintenance Plan

Exhibit G – Environmental Assessment

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
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 :  
 A PETITION FOR A DECLARATORY RULING : PETITION NO. \_\_\_\_  
 THAT A CERTIFICATE OF :  
 ENVIRONMENTAL COMPATIBILITY AND :  
 PUBLIC NEED IS NOT REQUIRED FOR THE :  
 CONSTRUCTION, OPERATION AND :  
 MAINTENANCE OF A 1.975 MWAC SOLAR :  
 PHOTOVOLTAIC PROJECT AT 669 PLATT :  
 ROAD IN WATERTOWN, CONNECTICUT : JULY 6, 2020

PETITION FOR A DECLARATORY RULING:  
INSTALLATION HAVING NO  
SUBSTANTIAL ADVERSE ENVIRONMENTAL EFFECT

I. Introduction

Pursuant to Section 16-50k(a) and Section 4-176(a) of the Connecticut General Statutes (“CGS”) and Section 16-50j-38 *et seq.* of the Regulations of Connecticut State Agencies (“RCSA”), Watertown Solar One, LLC and VCP, LLC d/b/a Verogy (collectively “Verogy” or “Petitioner”) hereby petitions the Connecticut Siting Council (the “Siting Council”) for a declaratory ruling that a Certificate of Environmental Compatibility and Public Need (“Certificate”) is not required for the construction, maintenance and operation of a 1.975 megawatt (“MW”) alternate current (“AC”) ground-mounted solar photovoltaic (“PV”) facility at 669 Platt Road in Watertown, Connecticut (the “Project”).

CGS § 16-50k(a) provides, in relevant part:

Notwithstanding the provisions of this chapter or title 16a, the council shall, in the exercise of its jurisdiction over the siting of generating facilities, approve by declaratory ruling . . . the construction or location of any . . . grid-side distributed resources project or facility with a capacity of not more than sixty-five megawatts, as long as: (i) Such project meets air and water quality standards of the Department of Environmental Protection [and], (ii) the council does not find a substantial adverse environmental effect. . . .

As described more fully below, the construction, operation and maintenance of the proposed Project satisfies the criteria of CGS § 16-50k(a) and will not have a substantial adverse environmental effect.

II. Petitioner

The Petitioner is a Connecticut limited liability company with an administrative office at 150 Trumbull Street, 4<sup>th</sup> Floor, Hartford, CT 06103.

Correspondence and/or communications regarding this petition should be addressed to:

William Herchel, Chief Executive Officer  
Bryan Fitzgerald, Director of Development  
VCP, LLC d/b/a Verogy  
150 Trumbull Street, 4<sup>th</sup> Floor  
Hartford, CT 06103  
wherchel@verogy.com  
bfitzgerald@verogy.com  
(860) 288-7215

A copy of all such correspondence or communications should also be sent to the Petitioner's attorney:

Kenneth C. Baldwin Esq.  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103-3597  
kbaldwin@rc.com  
(860) 275-8200

III. The Project

The Project will be developed on an approximately 16.6-acre portion (the "Project Area") of an approximately 154-acre parcel bounded on the east by Platt Road, on the north by Hinman Road and the Mount Olivet Cemetery and on the south and west by undeveloped forested land, agricultural fields and low density residential land uses in western Watertown, Connecticut (the

“Property”).<sup>1</sup> The Property is owned by the Catholic Cemeteries Association of the Archdiocese of Hartford. The northeasterly portion of the Property is the site of the Mount Olivet Cemetery. The remainder of the Property consists of undeveloped woodland areas. A wetland corridor (Wetland No. 1) extends from north to south in the western portion of the Project Area. Isolated wetland pockets (Wetland Nos. 2 and 3) were identified in the northerly portion of the Project Area and in the southeast corner of the Property (Wetland No. 4). The Project Area slopes gently down from the east to west toward Wetland No. 1 to the west. An Eversource transmission line runs, in an east-west direction along the northern limits of the Project Area.

A. Site Selection

The site selection for the Project was based on a detailed evaluation of several key criteria including:

- Site suitability (solar resource size, grade and surrounding topography);
- Site availability (ability to lease or purchase land);
- Proximity to critical infrastructure (suitable electrical grid access);
- Compatibility with surrounding land use.

Once the initial site evaluation was completed, the Petitioner assessed potential effects of the Project on the environment and sensitive site resources, including but not limited to scenic views and vistas, historic and archeological resources, wetlands, water quality and water resources, rare and endangered species and air quality. Prior to the commencement of this process, the Petitioner met with local officials in Watertown, Woodbury and Bethlehem and discussed the Project with adjacent residential property owners. As discussed in detail below,

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<sup>1</sup> The Property consists of two separate parcels, a 67.9-acre parcel (Parcel ID # 59-9-2) and an 86.4-acre parcel (Parcel ID # 67-9-3), both owned by the Catholic Cemeteries Association.

after this evaluation, the Petitioner determined that the Property was suitable for development of the Project and that the Project will provide a significant benefit to the public.

B. Project Description

The Project will consist of the installation of approximately 7,176 PV modules, sixteen (16) solar inverters, two (2) pad-mounted switch gears, two (2) transformers and one (1) interconnection line. The Project will use a fixed tilt steel panel racking system attached to either pile-driven or ground screw foundations to allow for optimal utilization of the Project Area. An access road will extend into the Project Area from the southwest corner of the Mount Olivet Cemetery.

The Project Area will be surrounded by a six (6) foot tall chain link fence with black vinyl coating. The fence will be raised 6" above ground level in all locations to accommodate wildlife movement. A copy of the Project development plan illustrating the above-described attributes is included as Exhibit A.

The Project is expected to produce in excess of 3,574,552 Kilowatt-Hours (kWh) of energy in the first year of operation, enough energy to power 428 homes. Energy produced by the Project will be sold to Eversource at market rates specified in the applicable utility tariff with Eversource for any self-generation facility. Alternatively, in the event virtual net metering capacity becomes available, energy produced by the Project may be delivered to Eversource through the Virtual Net Metering Rider (effective September 24, 2019, by PURA Decision dated October 21, 2019, under Docket No. 13-08-14RE05) ("VNM Rider") or any successor rider thereto. Any participation in the virtual net metering program would be subject to all VNM Rider and other program requirements and is contingent upon the availability of virtual net metering capacity. The Project will have a design life of 35 years and efficiency loss of

approximately 0.5% per year.

Construction of the Project is expected to begin in the fourth quarter of 2020 with mobilization of equipment and minor land clearing and grading efforts. Site work and land preparation is expected to be completed by January 11, 2021 with construction and installation of the solar arrays and equipment completed in February of 2021. Final site stabilization, testing, and commissioning is expected to be completed by March 10, 2021. The Project construction schedule is subject to change. At the end of its useful life, the Project will be decommissioned in accordance with the requirements of the Petitioner's land lease agreement and the Decommissioning and Restoration Plan attached hereto as Exhibit B.

C. Interconnection

Electrical interconnection for the Project will originate along Platt Road and extend underground, approximately 1650 feet west to the Project Area. (See Exhibit A). The Project will interconnect to the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource"), 13.8kV Shaws Hill 24H6 circuit distribution system located on Platt Road.<sup>2</sup>

The interconnection facility design and construction will be performed in accordance with the Eversource Guidelines for Generator Interconnection and State of Connecticut, ISO-New England ("ISO-NE"), and Federal Energy Regulatory Commission ("FERC") requirements as applicable. As part of the interconnection process, the Petitioner has successfully completed a utility-sponsored Scoping Meeting, Interconnection Application Request and an Application Review, Impact Study, and has executed a Standard Fast Track and Study Process Generator Interconnection Agreement.

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<sup>2</sup> Eversource will be responsible for all necessary permits/approvals (if any) for this interconnection construction.

#### IV. Project Benefits

The Project will generate much, if not all, of its power at peak times, when the demand for electricity is greatest, and will thereby provide the electrical system with flexible peaking capacity that is necessary to keep the electrical grid stable.

Further, the Project supports the State's energy policies as set forth in CGS § 16a-35k, including the goal to "develop and utilize renewable energy resources, such as solar and wind energy, to the maximum practicable extent." The Project will provide clean, renewable, solar-powered electricity and assist the State in meeting its legislatively-mandated obligations under the Renewable Portfolio Standard.

The Project will also assist the State of Connecticut in reducing greenhouse gas emissions and reducing criteria air emissions pollutants associated with the displacement of older, less efficient, fossil fuel generation. As part of larger state, national and global strategies, reductions in greenhouse gas emissions from this Project will have long-term secondary biological, social and economic benefits. Similarly, the advancement of renewable resources at a distributed level contribute to our Nation's desire for energy independence and reduces our dependency upon foreign countries where geo-political issues may not align with National policy.

#### V. Local Outreach and Public Notice

In November of 2020, the Petitioner informed municipal officials in Watertown, Woodbury and Bethlehem of its plans to develop the Project<sup>3</sup>. Over the next seven (7) months the Petitioner remained in regular contact with municipal officials keeping them apprised of the Project's progress and the permitting and development schedules.

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<sup>3</sup> A portion of the Property is within 2,500 feet of the Watertown town boundary with both Woodbury and Bethlehem.

In June of 2020, the Petitioner began its formal public outreach effort to local residents, neighboring landowners and members of the greater Watertown community.

This public outreach effort included:

- 1) The launching of a Project-specific web site with detailed information on the Petitioner, the Project and the Project's development schedule.
- 2) The development and distribution of a Project Fact Sheet, Frequently Asked Questions (FAQs), and contact information for the Petitioner.
- 3) The mailing of personal Notice Letters on June 11, 2020 to all abutting property owners, notifying them of the Petitioner's plans to develop a solar generating facility at the Property.
- 4) Posting of information on the Project web site along with copies of the Project fact sheet and FAQs were included in the Notice Letter sent to the abutting landowners.
- 5) Continued outreach to municipal officials in Watertown, Woodbury and Bethlehem through June 2020.

Included in Exhibit C are copies of Verogy's public outreach materials as well as a summary of the comments received and addressed throughout this process.

Pursuant to the requirements of R.C.S.A. § 16-50j-40(a), the Petitioner also provided notice of its intent to file this Petition to: (a) Catholic Cemeteries Association of the Archdiocese of Hartford, the owner of the Property; (b) each adjacent property owners listed on Exhibit D; and the municipal officials and government agencies listed on Exhibit E.

Although not required, prior to filing the Petition, the Petitioner, as a courtesy, also provided information about the Project to the Connecticut Department of Agriculture ("DoAG")

and the Connecticut Department of Energy and Environmental Protection (“DEEP”).

VI. No Substantial Adverse Environmental Effects

Section 16-50k(a) of the General Statutes provides, in part, that a Certificate is not required if an electric generating facility meets the air and water quality standards of the DEEP and does not have a substantial adverse effect. The Petitioner and its consultant, All-Points Technology Corporation (“APT”), conducted a comprehensive Environmental Assessment (the “EA”) of the Project dated June 2020. As part of this process, relevant agencies were consulted, environmental impacts were evaluated, and mitigation was applied as appropriate. A complete copy of the EA is included in Exhibit G.

A. Natural Environment and Ecological Balance

The Project Area is located in an undeveloped, wooded portion of the Property to the south and southwest of the Mount Olivet Cemetery. The layout of the solar arrays fully utilizes existing grades within the Project Area possible in order to minimize the required amount of earth work. Some earth work will, however, be necessary throughout the Project Area to control stormwater runoff and meet equipment tolerances. Soil disturbance is also required to install foundations for the PV panels, associated equipment, and access roads. Panel foundations will be secured using a driven pile technology or ground screw foundations. All racking will be designed to meet applicable building code requirements for wind and snow loads. The panels will be installed with adequate room above the ground to allow snow to melt or slide off.

Some hazardous substances are required to be used or stored on the Property during construction or operation of the Project. Namely, gasoline or diesel-powered equipment will be in regular use during construction activities, requiring some on-Property fuel storage. Further, the inverter step-up transformers located at each equipment pad will use biodegradable oil for

cooling. Accordingly, an appropriate Spill Prevention, Control, and Countermeasure (SPCC) plan will be implemented and incorporated in to the Project's Operations and Maintenance ("O&M") Plan. (See Exhibit F).

B. Public Health and Safety

Overall, the Project will meet or exceed all health and safety requirements applicable to renewable electric power generation facilities in Connecticut. Each employee working on Site will:

- Receive required general and Site-specific health and safety training;
- Comply with all health and safety controls as directed by local and state authorities;
- Understand and employ a Project health and safety plan while on the Property;
- Know the location of local emergency care facilities, travel times, ingress and egress routes; and
- Report all unsafe conditions to the construction manager.

During construction, heavy equipment will be required to access the Project Area during normal working hours (7 a.m. to 7 p.m. Monday through Saturday) as needed. After construction is complete and during Project operations, minimal traffic is anticipated. For standard operations and maintenance activities, one to two light-duty vehicles will visit the Project Area on a monthly recurring basis, on average. There will not be permanent staff present at the Project Area.

The Project will not produce significant noise during operation. The only noise generated from the equipment at the Facility will be from the inverters and transformers. The nearest receptors are, however, a significant distance from these potential noise sources to bring operational noise levels into compliance with local standards.

During the construction of the Project, higher levels of noise are anticipated, however, all work be conducted during normal working hours. Verogy does not anticipate that the levels of noise will exceed State or local noise standards. (See Exhibit G, Section 3.9).

Because the solar modules are designed to absorb incoming solar radiation and minimize reflectivity, only a small percentage of incidental light will be reflected off the panels. This incidental light is significantly less reflective than common building materials, such as steel, and the surface of a smooth water body. Additionally, the panels will be tilted up toward the southern sky at a fixed angle of 30 degrees, thereby further reducing reflectivity.

The Petitioner submitted the Project location to the Federal Aviation Administration's (FAA) Obstruction Evaluation Group and received Determinations of No Hazard to Air Navigation. Thus, the Project does not pose a hazard to air navigation and does not require further study. (See Exhibit G, Section 3.11).

Prior to operation, the Petitioner will meet with Town first responders to provide them information regarding response to emergencies at PV facilities, discuss industry best practices, and provide a tour of the Project.

#### C. Air Quality

Overall, the Project will have minor emissions of regulated air pollutants during construction, however no air permit is required for these activities. During construction of the Project, any air emission effects will be temporary and will be controlled by enacting appropriate mitigation measures (e.g., water for dust control, avoid mass early morning vehicle startups, etc.). Accordingly, any potential effects on air quality as a result of the Project construction activities will be minimized.

During operation, the Project will not produce air emissions of any regulated air

pollutants or greenhouse gases (e.g., PM10, PM2.5, VOCs, GHG or Ozone). Therefore, no adverse effect on air quality is anticipated and no air permit will be required. Moreover, for the life of the Project, an off-set equivalent to approximately 2,527 metric tons of CO<sub>2</sub> annually, the same amount of carbon sequestered by approximately 41,790 seedlings grown for ten years or 6,271,343 cars being taken off the road is anticipated.<sup>4</sup> (See Exhibit G, Section 3.5).

D. Scenic Values

No designated scenic roads or scenic areas are located near or impacted by the Project. Furthermore, no designated scenic roads or public recreation areas were found to be present in the area that would serve as potential observation points. (See Exhibit G, Section 3.8 and Appendix G).

The Petitioner will also maintain the substantial natural vegetative buffer around the perimeter of the Project Area. These natural areas will help to reduce the potential for scenic impacts of the Project. Views into the developed portion of the Project Area will be available from the open areas within the Mount Olivet Cemetery and adjacent cleared areas. Seasonal views into the Project Area may extend beyond the Property during the winter months when leaves are no longer on the surrounding trees. (See Exhibit A and Exhibit G, Appendix G – Viewshed Map and Photo-Simulations).

E. Historic and Archeological Resources

On behalf of the Petitioner, APT's consultant, Heritage Consultants, LLC ("Heritage") prepared a Phase 1-A and a Phase 1-B Cultural Resource Survey Reports for the Project Area. APT/Heritage, on behalf of the Petitioner, requested a review of the Project by the State Historic Preservation Officer (SHPO). A response from the SHPO was received on June 1, 2020

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<sup>4</sup> U.S. EPA Greenhouse Gas Equivalencies Calculator.

confirming that “no historic properties will be affected” by the Project. (See Exhibit G, Section 3.7).

F. Habitat and Wildlife

Forest and habitat surveys for the Project identified four habitat types on the Property and within the Project Area. Wetland habitats also occur on the Property, some of which are adjacent to the Project Area. (See Exhibit G, Section 3.1).

1. Habitat Type

a. Mixed Hardwood Forest

Mixed hardwood forest habitat is the dominant habitat type on the Property.

While some portions this forest habitat are identified as “core forest”, a majority of the forest habitat, including the entire forest habitat within the Project Area, is classified as “edge forest”. (Exhibit G, Section 3.1, Figure 4).

b. Old Field

Two small areas of late Old Field habitat are located in the southwestern and east-central portions of the Property. Species in these areas include shade-intolerant plants that colonize recently cleared lands, typically following agricultural uses. The Project Area will cover the entirety of this habitat. (Exhibit G, Section 3.1).

c. Disturbed/Scarified

This habitat is located in the northeast portion of the Property, outside the Project Area, and associated with the active cemetery use, including material stockpile and storage areas. Frequent heavy machinery traffic/disturbance limits growth of any vegetation. This habitat experiences routine disturbance and does not support any substantial habitat value.

d. Developed Areas

Developed areas on the Property consists of the existing paved roadways within the cemetery, adjacent to the Project Area. The Project would have no substantive impacts to these developed areas.

5. Wildlife Habitat

As discussed in more detail in Exhibit G, the Project will alter, in some limited fashion, three of the four habitat types located on the Property. Existing land uses in the area surrounding the Property have, however, resulted in substantial habitat fragmentation. As such, Project related impacts to forested habitat would likely not result in a significant negative effect on a larger landscape. (See Exhibit G Section 3.1.2). To further mitigate these affects, the Petitioner is proposing to establish certain Habitat Enhancement Areas (“HEAs”) around the perimeter of the Project Area. These HEAs, as described in Section 3.1.3 of the EA (Exhibit G), will allow the area around the Project perimeter to revert to Old Field habitat and provide connectivity between the wetland and forested areas on the Property.

6. Natural Diversity Database

The DEEP Natural Diversity Data Base (“NDDB”) program performs hundreds of environmental reviews each year to determine the impact of proposed development projects on state listed species and to help landowners conserve the state’s biodiversity. In furtherance of this endeavor, the DEEP develops maps to serve as a pre-screening tool to help determine if a project could potentially have an impact on state-listed species. APT reviewed the most recent NDDB mapping (June 2020) to determine if any such species or habitats occur on or within 0.25-mile of the Property. Based on the NDDB mapping, neither condition exists with respect to the Project Area.

## 7. USFWS Consultation

The northern long-eared bat (“NLEB”; *Myotis septentrionalis*) is a federally-listed<sup>5</sup> threatened species also known to occur in the vicinity of the Property. The NLEB’s range encompasses the entire State of Connecticut and suitable NLEB roost habitat includes trees (live, dying, dead, or snag) with a diameter at breast height (“DBH”) of three (3) inches or greater.

In compliance with the U.S. Fish and Wildlife Service (“USFWS”) criteria for assessing NLEB, the Project will not likely result in an adverse effect or incidental take<sup>6</sup> of NLEB and does not require a permit from USFWS. A letter confirming compliance was received by USFWS on January 9, 2020 thus no further consultation with USFWS is required for the proposed activity. (See Exhibit G Section 3.2.2)

## 8. Wetlands and Watercourses

APT identified four (4) wetlands on the Property during a field inspection and wetland delineation completed in November of 2019. The results of the field delineation are summarized in Exhibit G, Section 3.3.1.

No wetlands or watercourses will be directly impacted by the Project. Portions of the Project Area will require grading proximate to these resources to facilitate installation of stormwater management features, solar arrays and perimeter fencing. Clearing and grading limits for the Facility’s infrastructure (solar arrays, associated equipment and fencing) would maintain a minimum setback of approximately 80 feet to wetlands and watercourses, except for activity associated with the proposed electrical interconnection north of Wetland 4.

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<sup>5</sup> Listing under the federal Endangered Species Act

<sup>6</sup> “Incidental take” is defined by the Endangered Species Act as take that is “incidental to, and not the purpose of, the carrying out of an otherwise lawful activity.” For example, harvesting trees can kill bats that are roosting in the trees, but the purpose of the activity is not to kill bats.

To promote protection of wetlands and watercourses during construction, safeguards have been developed to avoid unintentional impacts to these resources, including a Project-specific wetland protection plan (*see* Exhibit G, Appendix B) and the installation and maintenance of erosion and sedimentation (E&S) controls in accordance with the 2002 *Connecticut Guidelines for Soil Erosion and Sediment Control*.

9. Vernal Pool

Vernal pool surveys of the Property were conducted on March 18 and 30, and April 7, 2020. A single vernal pool embedded within the southern portion of Wetland 1 was identified. Construction and operation of the Project would not result in direct physical impact to the vernal pool. The Project will not impact the Vernal Pool Envelop (“VPE”) but will increase development within the Critical Terrestrial Habitat (“CTH”) area by approximately 10%. To mitigate these impacts, the Petitioner proposes to establish a Habitat Enhancement Area around the Project Area near the vernal pool through natural revegetation to promote a more natural transition between habitat areas. The Petitioner is also proposing a Resource Protection Plan that will mitigate potential impacts to the Vernal Pool and dependent wildlife during construction. As such, it is APT’s opinion that the proposed increase in development within the CTH would be de minimis and that the Project will not result in a likely adverse impact to the identified vernal pool. (*See* Exhibit G, Section 3.3.3).

10. Floodplain Areas

According to the United States Federal Emergency Management Agency (“FEMA”) Flood Insurance Rate Maps (“FIRM”), Community Panel #0900580009B, dated November 5, 1980, the Property is located in an area of minimal flooding, typically above the 500-year flood level. (*See* Exhibit G Section 3.3.4).

G. Water Quality

The Project will use no water during operations in the production of electricity. Any water utilized during the construction of the Project for dust suppression will be minimal and have no impact on the water quality near the Property. As mentioned above, the Property is located outside the 500-year floodplain, areas with a minimal risk for flooding. Thus, no impacts on water quality or supply would occur with the construction or operation of the proposed Project. (See Exhibit G, Section 3.4).

Groundwater underlying the Property is classified by DEEP as “GA”. This classification indicates groundwater within the area is presumed to be suitable for human consumption without treatment.<sup>7</sup> Based upon a review of available DEEP mapping, the Site is not located within a mapped preliminary or final Aquifer Protection Area.

H. Stormwater Management

The Project has been designed to meet the current draft of DEEP’s Appendix I Stormwater Management at Solar Array Construction Projects requirements. To safeguard water resources from potential impacts during construction, the Petitioner is committed to implementing protective measures in the form of a Stormwater Pollution Control Plan (“SWPCP”) to be finalized and submitted to the Council, pending approval by DEEP Stormwater Management. The SWPCP will include monitoring of established E&S controls that will be installed and maintained in accordance with the 2002 *Connecticut Guidelines for Soil Erosion and Sediment Control*. The Petitioner will also apply for a *General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities* from DEEP. (See Exhibit G, Section 3.4.3).

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<sup>7</sup> Designated uses in GA classified areas include existing private and potential public or private supplies of water suitable for drinking without treatment and base flow for hydraulically connected surface waterbodies.

VII. Conclusion

The Project will provide numerous and significant benefits to Watertown, the State of Connecticut and its citizens, and will place Watertown at the forefront of green energy development while producing substantial environmental benefits with minimal environmental impact. Pursuant to CGS §16-50k(a), the Siting Council shall approve by declaratory ruling the construction or location of a grid-side distributed resources project or facility with a capacity of not more than 65 MW, as long as such project meets DEEP air and water quality standards and will not have a substantial adverse environmental effect. As amply demonstrated in this Petition, the Project meets these criteria.

The Petitioner, therefore, respectfully requests that the Siting Council issue a declaratory ruling that the proposed Project will comply with DEEP air and water quality standards, will not have a substantial adverse environmental effect and, does not require the issuance of a Certificate by the Siting Council.

Respectfully submitted,

WATERTOWN SOLAR ONE, LLC AND  
VCP, LLC d/b/a VEROGY

By 

Kenneth C. Baldwin, Esq.  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103  
Phone: (860) 275-8345  
Email: kbaldwin@rc.com  
Its Attorney