Gravel Pit Solar, LLC
1166 Avenue of the Americas, 9th Floor
New York, NY 10036

MEMORANDUM

TO: JASON BOWSZA, FIRST SELECTMAN

FROM: AARON SVEDLOW, GRAVEL PIT SOLAR (GPS) DIRECTOR OF DEVELOPMENT

SUBJECT: GRAVEL PIT SOLAR PROJECT – RESPONSE TO TOWN COMMENTS

DATE: JULY 20, 2020

CC: AILEEN KENNY – GPS ENVIRONMENTAL DIRECTOR
JONATHAN GRAVEL – GPS DEVELOPMENT
LEE HOFFMAN – PROJECT COUNSEL

The Gravel Pit Solar (GPS) Project team appreciates the Town of East Windsor's timely review and comments regarding the GPS draft application materials provided on May, 22 2020. The GPS project team has prepared the following responses to the comments provided by the Engineering & Public Works and the Planning and Development Department. Additionally, in response to the Town's comments, GPS has revised the Visibility Assessment Report to include a Visual Mititation Plan (see enclosed Attachment A). We look forward to continuing to work closely with the Town as we develop this exciting project.

Engineering and Utility and Public works – Comments

1. *Collector lines will be routed beneath Ketch Brook via a jack and bore or horizontal direction drill method. I agree that either method will have the least impact to the brook and the environment.*

Response 1: Thank you for the comment.

2. *Collector lines crossing Plantation Road will be overhead or underground. If underground, I recommend that a boring method be utilized.*

Response 2: GPS is committing to an underground crossing of Plantation Road, and we agree that a boring method is the most appropriate.

3. *The storm water report, exhibit L, was not included in my package for review.*

Response 3: GPS is currently working with the Connecticut Department of Energy and Environmental Protection's stormwater division to finalize the Project's stormwater pollution control plan that will be submitted as part of a stormwater permit application. We will provide a copy of the report and plan to the Town as soon as it is completed.

4. *Based upon the narrative on page 61 of the draft application, the proposal is to place a non-woven geotextile fabric on the ground surface and placing the processed stone over the fabric in place of*

stripping the topsoil for the driveway construction. This should minimize the stripping of topsoil. I recommend that any topsoil that must be stripped be stockpiled and stored on site.

Response 4: It is GPS' intention to leave topsoil in place as much as practicable. If topsoil needs to be stripped, it will be stockpiled and stored onsite.

5. *It appears that a great effort will be made to minimize the impacts to the wetlands and the environment.*

Response 5 : Thank you for the comment.

6. *The plans and application call for a 7' high chain link fence to be installed around the entire perimeter of the project. I recommend that this fence be black nylon coated in areas that will be visible to the public. On page 10 of the visibility assessment, it is stated that assumed maximum panel heights may be 15.5' or 9'. I recommend that a taller fence be utilized in areas that these panels may be visible to adjacent residences.*

Response 6: Based on Town feedback on fencing and landscaping referenced in comment 7, GPS had a revised Visibility Assessment and Mitigation Plan prepared (Attachment A). The Mitigation Plan includes, in addition to specifications regarding landscaping, the use of an agricultural type fencing to be used along the perimeter of the solar arrays. The Mitigation Plan also details the location of different visual screening schemes for nearby residences. We are proposing the agricultural fencing because it will maintain Project safety while utilizing materials that conform with the character of the surrounding setting, in areas where the fence is highly visible a black coated or black vinyl agricultural fence can be used. We would be happy to discuss fencing and landscaping further with the Town as we proceed with the design of the Project.

7. *On page 26 of the visibility assessment, figure 3.3-9, there is a conceptual landscape mitigation plan for Apothecaries Hall Road. I recommend that this mitigation continue to the west in front of the other residences on the road to a point where the natural vegetative/grade buffer exists.*

Response 7: As noted in Response 6, we have revised the Visibility Assessment report and added a Mitigation Plan, to include visual simulation illustrating alternative planting schemes, and additional buffers as well as enhanced aesthetics at gated entrances.

8. *I recommend that the Fire Marshals in East Windsor and South Windsor review the plans to ensure that the access roadways are designed to accommodate their vehicles.*

Response 8: GPS will coordinate with both Fire Marshals to confirm if the current proposed access roadways need adjustments.

9. The draft emergency management plan notes spill prevention protocol. What types of hazardous substances are likely to be stored on site?

Response 9: Spill Prevention Control and Countermeasure (SPCC) Plans will be prepared for both the construction and operation phases of the Project. During construction, the primary hazardous material

stored on-site would-be petroleum-based fuels and fluids that would be used for daily upkeep of equipment. During operation, no fuels are anticipated to be stored on site. The Operations SPCC Plan is specifically for the fluid in the Project's transformers, which are fully contained.

10. There are areas on the plans where there are construction activities shown outside of the limits of construction. I recommend the limits be revised in these areas.

Response 10: Thank you for pointing that out, these areas have been identified and plans are being revised accordingly.

11. The scaling of the 20' side yard setback is inconsistent throughout the plans. I recommend that this be rectified on all sheets.

Response 11: We have revised the plans so that the Project conforms to all side yard setbacks.

12. On sheets 11 and 15 of 30, proposed contours are shown as ending without connecting to existing contours. I recommend that these areas be checked.

Response 12: It is GPS's intention to have all proposed grades match with existing grades. Project plans will be amended appropriately.

13. I recommend that any construction entrance onto a Town Road be a minimum of 100' long.

Response 13: GPS has considered the recommendation regarding the construction entrance and is willing to extend the construction entrances from 50ft to 75ft in length. The additional 25ft would provide additional mitigation to minimize any tracked sediment onto town roads. During construction, active entrances will be inspected and public roadways will be cleaned as necessary.

Planning and Development - Comments

1. *The narrative should describe how the project plans to incorporate landscape architecture techniques for the selection and application of vegetative materials and how these will enhance the surrounding area while reducing any visual impacts for residents along Apothecaries Hall Road and Windsorville Road.*

Response 1 – The Visibility Assessment report has been revised to include a Mitigation Plan and provides an overview of the conceptual mitigation planting design.

2. *Gateways to the property should also receive some design attention as they help define physical and psychological transitions between land uses.*

3. *Wood from the existing tobacco shed could potentially be incorporated as design elements to these gateways to help convey the past history of the Site.*

Responses 2 and 3 : GPS is looking to enhance the Project entrances to better integrate into the surrounding setting, please see the revised Visibility Assessment and Mitigation Plan. GPS is currently

working with the Connecticut State Histroic Preservation Office (CT SHPO) regarding the tobacco farm and barns. GPS will consider techniques to utilize tobacco barn materials, as well as some of the tobacco barns themselves, to reduce visual impacts, pending SHPO's concurrence.

4. *We recommend that the next draft of the Application considers including more than one landscape design option as the one shown on page 27 of the Visibility Assessment Report. That way, both reviewers and local residents will have the opportunity to weigh in the design process and select the best alternative.*

Response 4: The Visibility Assessment report has been revised to include a Mitigation Plan (Appendix B) and an additional visual simulation illustrating alternative planting schemes.

5. *Applicant should consider perimeter fencing height options above seven feet as historically the site has been trespassed on multiple occasions. Perhaps a nine foot high fence could be worth exploring.*

Response 5: GPS believes that the newly proposed 7-8-foot agricultural fence topped with a single strained of barbwire would deter potential trespassers effectively. The intent is to have the fence topped with a single strand of barbed wire along the back of the Project, in areas facing public rights-of-way the fence would be topped with a single strand of tensel steel wire which is less visually jarring than the barbed wire but is an effective barrier to access.

6. *Applicant should consider adding to the narrative description of how the internal roadway network will be maintained, particularly in a scenario where crews have to go into the property in an emergency after a heavy snowfall event.*

Response 6: GPS has prepared a draft Emergency Management Plan which includes provisions for the maintaining access.

Please feel free to contact me with any additional questions or comments.

Sincerely,

Aaron Svedlow

Attachment A - Visibilitly Assessment Report (Rev July 2020)