

Lee D. Hoffman

90 State House Square Hartford, CT 06103-3702 p 860 424 4315 f 860 424 4370 lhoffman@pullcom.com www.pullcom.com

March 31, 2021

VIA ELECTRONIC FILING AND HAND DELIVERY

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

Re: Docket 492 - Gravel Pit Solar – Application for Certificate of Environmental Compatibility and Public Need to The Connecticut Siting Council Regarding a Solar Project in East Windsor, Connecticut

Dear Ms. Bachman:

I am writing on behalf of my client, Gravel Pit Solar ("GPS") in connection with this Docket. With this letter, I am enclosing the Development and Management ("D&M") Plan for Phase I of the construction of the GPS project in East Windsor, Connecticut. As you may recall, the GPS project is designed to be constructed in several phases, the first of which is scheduled to begin later this year. This phase of construction is referred to as Phase I, and the enclosed D&M Plan specifically addresses the Phase I construction activities for the GPS project.

In addition, as a result of the discussions during the project's public hearings, GPS has made several alterations to the project, the net effect of which is to alter the project footprint for the staging areas of the project and the relocation of the HDD crossing locations. The changes to the project are clearly delineated in the enclosed Phase 1 D&M Plan

As is delineated in greater detail in section 1.2 of the D&M Plan, Phase I will entail the following activities:

- Pre-construction site preparation;
- Stabilization of the construction entrances;
- Construction of access roads;
- Surveys of tree clearing activities;
- Conduct of tree clearing and grubbing;
- Installation of erosion and sediment controls in accordance with applicable standards;
- Perform grading and earthwork at the site;
- Conduct horizontal directional drilling under Ketch Brook and the Connecticut Department of Transportation railroad right-of-way; and
- Pre-seed areas on the site that lack vegetation.

pullcom.com Bridgeport Hartford Springfield Stamford Waterbury Westport White Plains



Page 2

Once these activities are completed, GPS will leave the site in a stable condition prior to 2022, when Phase 2 of the construction is planned. Prior to beginning Phase 2 of construction, GPS will submit a D&M Plan addressing Phase 2 construction activities, which will include, among other things, the detail of the layout of the solar arrays and inverters, as well as all wiring and cabling necessary to connect the various facilities. Details surrounding the switchyard and substation will also be included in that D&M Plan.

The Council's February 25, 2021 Decision and Order regarding this project required GPS to produce additional information to the Siting Council. Most of this information is being provided with this Phase 1 D&M Plan. Much of the remaining information will be provided with the Phase 2 D&M Plan. One exception is the DEEP-issued General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ("General Permit"). The General Permit application for the project is currently under review by DEEP. Once the project has been granted its General Permit, the project will provide a copy of the permit to the Siting Council. The project understands that it cannot begin construction until the Siting Council receives a copy of the General Permit.

The remaining items to be provided to the Siting Council, and their status are as follows:

Requirement from Decision and Order	Status
Final site plans	Site plans detailing the proposed Phase 1 activities are included with this D&M Plan. The site plans for Phase 2 activities will be provided to the Council in the Phase 2 D&M Plan.
Erosion and sedimentation control plan	The requested information is contained in the project's SWPCP, which is included in the Phase 1 D&M Plan.
Site construction detail/phasing plan	This material is included in this Phase 1 D&M Plan.
Final landscape visual mitigation plan	An updated visual mitigation plan is included in the Phase 1 D&M Plan.
Final DEEP NDDB determination	A copy of the February 10, 2021 final NDDB determination is included in this Phase 1 D&M Plan.
Solar module specifications	Information regarding the solar module specifications will be provided in the Phase 2 D&M Plan.
Final structural design for the solar module racking system	This design, stamped by a Connecticut-licensed professional engineer, will be provided in the Phase 2 D&M Plan.
Consultation with DEEP dam safety personnel	Correspondence with DEEP dam safety personnel is included in this Phase 1 D&M Plan.
Details regarding the use of the secondary access road on Apothecaries Hall Road as an alternative entrance point	Details regarding this alternative access point are included in this Phase 1 D&M Plan.
Project construction hours/days of the week	Typical construction times will be from 7:00 a.m. to 5:00 p.m. Monday through Friday. The project



Page 3

	anticipates that some weekend work and longer
	hours may occur to meet critical milestones.
Construction traffic control plan developed after	A traffic management plan, developed after
consultation with the Town of East Windsor	consultation with the Town, is included in this
	Phase 1 D&M Plan.
Requirement from Decision and Order	Status
Confirmation that no chemicals shall be used for	No chemicals shall be used for solar panel
solar panel cleaning	cleaning.
Provision of all necessary permits from any other	The project will provide the Council with the
state or federal agency prior to commencement of	General Permit prior to construction. The project
construction	has obtained all other required approvals and has
	provided them to the Siting Council.

The project looks forward to working with the Council towards the approval of this Phase 1 D&M Plan. If there are any questions concerning this submittal, please contact me directly. I certify that a copy of this submittal has been submitted to the parties listed on the service list for this Docket.

Sincerely,

Laa D. Hoffmar

Enclosures