

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

December 29, 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

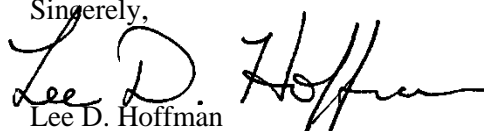
Dear Ms. Bachman:

I am writing on behalf of my client, Gravel Pit Solar (“GPS”) in connection with this Docket. With this letter, I am enclosing an original and fifteen copies of the Development and Management (“D&M”) Plan for Phase II of the construction of the GPS Project in East Windsor, Connecticut, as well as two full-sized sets of site drawings for the Project.

As you may recall, the GPS project is designed to be constructed in several phases, the first of which is now scheduled to begin in January or February of 2022. This phase of construction is referred to as Phase I, and the Council previously approved the D&M Plan to address the Phase I construction activities for the GPS Project. When it issued its approval of the Phase I D&M Plan, it required certain additional information be provided to the Council. That information is included in the Phase II D&M Plan.

Given the voluminous nature of this submission, the contents of the submission have also been placed in a file sharing site, which can be accessed at: https://vhb-my.sharepoint.com/personal/smoberg_vhb_com/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fsmoberg%2Fvvhb%2Fcom%2FDocuments%2FFTP%2FGravel%2FPit%2FSolar%2FD%26M%20Plan%20P2%2FFINAL%2F29%2DDec%2D2021.

The Project looks forward to working with the Council towards the approval of this portion of its 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,

Lee D. Hoffman

Enclosures

December 29, 2021

Gravel Pit Solar

Development and Management Plan | Phase 2
Docket No. 492



SUBMITTED TO

Connecticut Siting Council

PETITIONER

Gravel Pit Solar, LLC
Gravel Pit Solar II, LLC
Gravel Pit Solar III, LLC
Gravel Pit Solar IV, LLC

PREPARED IN ASSOCIATION WITH

Pullman & Comley, LLC
Vanasse Hangen Brustlin, Inc.
Heritage Consultants, LLC
Environmental Design & Research | DPC

Gravel Pit Solar

120 MW Solar Photovoltaic Energy Generation Project East Windsor, Connecticut

PREPARED FOR



Gravel Pit Solar, LLC
Gravel Pit Solar II, LLC
Gravel Pit Solar III, LLC
Gravel Pit Solar IV, LLC

1166 Avenue of the Americas, 9th Floor
New York, NY 10036

PREPARED BY



100 Great Meadow Road
Suite 200
Wethersfield, CT 06109

December 29, 2021

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List of Exhibits

Exhibit No.	Description
Exhibit A	Stormwater Pollution Control Plan and Site Plans
Exhibit B	Eversource Switchyard and GPS Substation Plans
Exhibit C	Figures
Exhibit D	Toxicity Characteristic Leaching Procedure and Extractable Heavy Metals Test Results
Exhibit E	Specification Sheets
Exhibit F	CT DEEP Conditional Stormwater General Permit Approval
Exhibit G	U.S. Army Corps of Engineers New England District Approved Jurisdictional Determination
Exhibit H	CT DEEP Monitoring Well Relocation Approval
Exhibit I	SHPO Correspondence

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List of Acronyms and Definitions

AC	Alternating Current
AJD	Approved Jurisdictional Determination
C.G.S.	Connecticut General Statutes
CSC	Connecticut Siting Council
CT DEEP	Connecticut Department of Energy and Environmental Protection
CT DOT	Connecticut Department of Transportation
D&M Plan	Development and Management Plan
EPC	Engineer Procure Construct
FCA	Forward Capacity Auction
GPS	Gravel Pit Solar
ISO-NE	Independent System Operator of New England
kV	kilovolt
LLC	Limited Liability Company
MW	Megawatt
MOA	Memorandum of Agreement
NORCAP	Northern Capitol Disposal Facility
PFAS	Per- and polyfluoroalkyl substances
RCSA	Regulations of Connecticut State Agencies
SHPO	State Historic Preservation Office
SWPCP	Stormwater Pollution Control Plan
TCLP	Toxicity Characteristic Leaching Procedure
USACE	U.S. Army Corps of Engineers New England District
VHB	Vanasse Hangen Brustlin, Inc.

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Introduction

This Development and Management Plan (D&M Plan) is submitted by Gravel Pit Solar, LLC, Gravel Pit Solar II, LLC, Gravel Pit Solar III, LLC and Gravel Pit Solar IV, LLC (collectively Gravel Pit Solar or Applicant) in accordance with the requirements of Sections 16-50j-60 through 16-50j-62 of the Regulations of Connecticut State Agencies (RCSA) and with the Decision and Order issued by the Connecticut Siting Council (CSC or Council) for the Gravel Pit Solar Project (GPS or Project) in Docket No. 492. The Council's February 25, 2021 Decision and Order concluded that the proposed 120 megawatt (MW) ground-mounted solar photovoltaic system, located on eight separate parcels of land totaling approximately 738 acres located near Apothecaries Hall Road, Plantation Road, Wapping Road, and Windsorville Road in East Windsor, Connecticut, is not in conflict with the policies of the state concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, agriculture, forest and parks, air and water purity, and fish, aquaculture and wildlife, together with all other environmental concerns, including Electric and Magnetic Fields, and balanced the interests in accordance with Connecticut General Statutes (C.G.S.) §16-50p(a)(3)(B) and C.G.S. §16-50p(a)(3)(C). To the extent that there are environmental effects that are the subject of C.G.S. §16-50p(a)(3)(B) the Council has found that these effects can be sufficiently mitigated by the Project and do not outweigh the public benefit for the facility.

1.1 Certificate Conditions

As a condition for issuing the Certificate, the Council required that a D&M Plan be prepared to provide supplemental information regarding the Project. Specifically, the Council required the following information:

- › Final site plans including, but not limited to, final facility layout, access roads, equipment pads, collector lines including crossings for Ketch Brook and

- Plantation Road, substation, switchyard, fence design, equipment pads, stormwater management control structures, and final site seeding.
- › Erosion and sedimentation control plan consistent with the *2002 Connecticut Guidelines for Erosion and Sedimentation Control* including, but not limited to, temporary sediment basin details, site stabilization seeding/growing season details prior to the installation of post driving/racking system, site stabilization measures during construction, inspection and reporting protocols, methods for periodic clearing of temporary sediment traps and swales during construction, and final cleaning of stormwater basins upon site stabilization.
 - › Site construction detail/phasing plan including, but not limited to, construction laydown area, site clearing/grubbing, site grading, excess earth material disposal locations, site stabilization seeding/growing season details, soil stockpile locations, and a fuel storage/spill plan that is protective of groundwater resources.
 - › Final Landscape Visual Mitigation Plan including, but not limited to, landscaping and other visual screening, pollinator plantings, and gate designs.
 - › Final DEEP NDDDB Determination.
 - › Solar module specifications that indicate the selected solar module will not contain PFAS and will not be characterized as hazardous waste through TCLP testing.
 - › Final structural design for solar module racking system stamped by a Professional Engineer duly licensed in the State of Connecticut.
 - › Independent System Operator of New England (ISO-NE) Forward Capacity Auction (FCA) #15 results specific to the project.
 - › Consultation with the DEEP Dam Safety program regarding permitting requirements, if any, for the proposed stormwater basins prior to site construction.
 - › If land control is finalized, details of the use of the secondary access road on Apothecaries Hall Road as an alternative entrance point.
 - › Project construction hours/days of the week; Construction traffic control plan developed in consultation with the Town.
 - › No chemicals shall be used for solar panel cleaning.

A table summarizing compliance with each of these conditions is provided in Section 4, Table 4.

1.2 Project Phasing

GPS is planning to construct the Project between the winter of 2022 and fall of 2023. The Project has been contemplated into two general construction phases and therefore two phases of D&M Plan review.

1.2.1 Phase 1 D&M Plan

A Phase 1 D&M Plan was submitted in March 2021 that covered pre-construction site preparation and installation of stormwater controls which were planned to begin as early as June 2021. The Project construction schedule has been modified and these activities will not start before January 2022. The Phase 1 D&M Plan was approved by the Council in their May 21, 2021 Partial Development and Management Plan decision letter.

A detailed list of activities approved under the Phase 1 D&M Plan is provided below. The activities outlined in this list of construction activities are depicted on the Site Plans which are attached in Exhibit A.

- › Install stabilized vehicle tracking pad at the existing road intersection.
- › Survey and mark all woodland clearing limits.
- › Mark trees to be felled within 10 feet of clearing limits and, if necessary, install tree protection for trees to be preserved within 10 feet of clearing limits.
- › Field survey and mark boundary between clearing limits and grubbing limits.
- › As trees are cleared and grubbed, grind tops and root balls in tub grinder to create material for wood chip mulch berm.
- › As material is produced, install mulch berm at the limit of disturbance generally in areas of cleared forest. Mulch berm has nominal dimensions of 1.5 to 2 feet high by 4-foot wide.
- › Inside the perimeter mulch berm, install entrenched silt fence following standards of the 2002 Connecticut guidelines for erosion and sediment control. Mulch berm and perimeter silt fence shall be maintained in perpetuity until completion of construction.
- › Address ongoing erosion problems using temporary diversions and filling and grading gullies.
- › Install stormwater basins in accordance with the approved site-specific Stormwater Pollution Control Plan (SWPCP) and CT guidelines.
- › Install other erosion and sediment controls following the CT guidelines and manufacturer's directions. During construction, the contractor shall install measures as required by the engineer of record or qualified inspector, to prevent sediment-laden runoff from reaching wetlands or discharging offsite.
- › Establish designated vehicular traffic access roads (gravel, or compacted native soil, per plans) that shall be used as primary access paths. Efforts must be made to minimize vehicular trafficking across non-designated areas to the extent possible.
- › Perform mass earthwork on the site and install perimeter fence to serve as construction barrier. Given mix of land use at the Site, not all areas that will be regraded have existing topsoil (i.e. the gravel pits). In areas where topsoil is present and grading will occur, it shall be stripped and temporarily stockpiled.

- › Upon completion of mass earthwork activities, stockpiled topsoil shall be placed over regraded areas where topsoil was stripped.
- › Area disturbed by mass earthwork shall be reseeded and stabilized as necessary.
- › Pre-seed areas that lack vegetation within growing season, prior to the 2022 construction activities, if possible.
- › Install horizontal directional drill (HDD) under Ketch Brook and the CT Department of Transportation (CT DOT) railroad.

1.2.2 Phase 2 D&M Plan

This Phase 2 D&M Plan has been prepared by Vanasse Hangen Brustlin, Inc. (VHB) under the direction of Gravel Pit Solar and in association with ES Boulos Company (ESB), an Engineer Procure Construct (EPC) Contractor and TRC Companies, Inc., responsible for the design and construction of the Eversource switchyard and GPS substation facilities.

Gravel Pit Solar is currently in the process of identifying a contractor to construct and install the solar arrays.

The final Project Site Plans prepared by TRC and VHB are provided in Exhibit B and A, respectively.

The Council's Partial Development and Management Plan decision imposed two additional data requests. Below indicates the Council's data requests and the Project's responses.

- › The name(s) of the final seed mix(es) for under and around the solar panels be submitted.

Response: The area under and around the solar panels will be planted with a seed mix containing Little Bluestem (*Schizachyrium scoparium*), Creeping Red Fescue (*Festuca rubra*), Purple Lovegrass (*Eragrostis spectabilis*), Virginia wildrye (*Elymus virginicus*), Ladino clover (*Trifolium repens*), and Partridge Pea (*Chamaecrista fasciculata*). GPS coordinated with the property owners of the agricultural fields to plant this seed mixture in 2021 as part of their typically winter cover crop seeding effort.

- › The site contact and emergency contact information referenced in Section 5.1 of the Spill Prevention, Control, and Countermeasure Plan, including the environmental spill response, and contractor.

Response: A final construction phase Spill Prevention, Control, and Countermeasure (SPCC) Plan(s) will be provided for the responsible contractor(s) prior to commencing any construction activities. This information will be included in that SPCC Plan.

This Phase 2 D&M Plan is seeking approval for the remaining construction activities not previously approved in the Council’s Partial D&M Plan decision. Specifically, this includes:

- › Construct and install the solar facility infrastructure (piles, racking, modules, inverters, and collection wiring and cables)
- › Area disturbed during construction shall be reseeded and stabilized as necessary
- › Construction of the Eversource switchyard and GPS substation
- › Installation of landscaping plan
- › Final stabilization and seeding of the site and monitoring of erosion controls
- › Once the site is fully stabilized, remove temporary stormwater controls

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Applicant

Gravel Pit Solar, LLC, Gravel Pit Solar II, LLC, Gravel Pit Solar III, LLC and Gravel Pit Solar IV, LLC (collectively Gravel Pit Solar or the Applicant) are affiliates of D.E. Shaw Renewable Investments, LLC (DESRI) and are Delaware limited liability companies headquartered at 1166 Avenue of the Americas, 9th Floor, New York, NY 10036. DESRI, through its affiliates, is a leading developer, owner, and operator of renewable energy projects across North America, including two commercial solar projects in Connecticut: Tobacco Valley Solar (26.4 MW) and Fusion Solar (20 MW).

Correspondence and/or communications regarding this D&M Plan should be addressed to:

Aileen Kenney
Executive Director - Project Management and Development
D.E. Shaw Renewable Investments LLC
1166 Avenue of the Americas, 9th Floor
New York, NY 10036
(617) 852-7031
Aileen.Kenney@deshaw.com

Aaron Svedlow
Gravel Pit Solar Development Manager
1166 Avenue of the Americas, 9th Floor
New York, NY 10036
(207) 233-3644
Aaron@nleservices.com

A copy of all such correspondence or communications should also be sent to:

Lee D. Hoffman
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702
(860) 424-4315 (office)
(860) 424-4370 (fax)
lhoffman@pullcom.com

Connor Cox
Gravel Pit Solar Asset Manager
1166 Avenue of the Americas, 9th Floor
New York, NY 10036
(212) 478-0000
Connor.Cox@deshaw.com



3

Proposed Project

3.1 Project History

On July 31, 2020, the Applicant filed an Application for a Certificate of Environmental Compatibility and Public Need (the Application) with the CSC. The Project proposed in the Application consisted of a new solar power generating facility located on 485 acres of a 738-acre site consisting of eight parcels located near Apothecaries Hall Road, Plantation Road, Wapping Road, and Windsorville Road in East Windsor. Refer to Figure: USGS Project Location Map provided in Exhibit C.

The CSC held a Pre-Hearing Teleconference on September 30, 2020, an evidentiary hearing and public comment session held via Zoom remote conferencing on November 12, 2020 and a final evidentiary hearing held via Zoom on December 1, 2020. At its meeting on February 25, 2021 the Council issued the Project's Certificate pursuant to a Decision and Order authorizing the Project to be constructed contingent on the submission of a satisfactory D&M Plan and the issuance of other applicable permits.

A Phase 1 D&M Plan was submitted to the CSC on March 31, 2021 and approved in the Council's May 21, 2021 Partial Development and Management Plan decision letter.

3.2 Project and Property Description

3.2.1 Property Description

The Project includes the development of a 120-MW alternating current (AC) ground-mounted solar photovoltaic system that will encompass approximately 485 acres

(the Project Area) of the Project Site. The Project Site is located near Apothecaries Hall Road, Plantation Road, Wapping Road, and Windsorville Road. Refer to Site Location Map provided in Exhibit C.

The table below provides the Assessor’s parcel numbers, acreage and zoning designation for the nine properties that comprise the Project Site.

Table 1 Project Site Parcels

Parcel ID	Acreage ¹	Zoning Designation
057-65-001	97.8	R-M-1, and A-1
057-65-002	3.6	R-3
048-65-007	132.3	R-3, M-1, and A-1
037-65-005A	14.6	A-2
027-49-017C	86.5	R-3
025-49-017A	127.17	R-3
016-49-007	119.5	M-1
016-50-001	155.50	M-1
Portion of 057-49-003	1.4 ²	M-1
Total Area	738.36	

The Project Site is situated in the Connecticut River Valley and is generally characterized by sand and gravel quarries, tobacco fields, and forested land. The Project Site is located in the southern part of the Town of East Windsor. The Project Site is bounded by Windsorville Road on the south, Wapping Road on the east, Apothecaries Hall Road on the north, and Ketch Brook on the west.

The Project Site primarily contains a variety of existing land uses including partially reclaimed and to be reclaimed sand and gravel mining operations, agricultural fields (primarily tobacco fields), wooded areas, tobacco sheds and structures related to the farming operations, unimproved dirt farm roads interconnect the fields and provide access from public roadways, and vacant commercial land. In addition, the Eversource 1100 Line and 1200 Line 115-kV electrical transmission lines cross the Project Site from northwest to southeast, and a CT DOT railroad right-of-way

¹ Acreage according to VHB property boundary survey/site plans.

² Portion of 057-49-003 east of Railroad added to the Project Site in February 2021. This addition was described in detail in GPS’ Phase I D&M Plan.

extends north-south through the center of the Project Site. Table 2 provides acreage for these land uses.

Table 2 Cover Types with Project Parcels: Existing Area and Areas to be Altered (Acres)

Cover Type	Approximate Existing Area	Approximate Area to be Altered	Approximate Area not Altered
Agricultural Fields	230	228	2 ¹
Active Sand and Gravel Quarry	78	76	2
Forested Upland	248	63	185
Ruderal Forest ²	20	20	0
Forested Wetland	40	0	40
Shrubland ³	62	44	18
Other ⁴	60	54	5
Total	738	485	252

1 The acreage supporting the solar array panels will all be managed as cool season grassland. Agricultural fields not occupied by solar arrays will also be converted to grassland or other landscape areas.

2 Black locust, multiflora rose, Morrow's honeysuckle in reclaimed gravel pit

3 Primarily Public Utility Transmission Corridor and portions of reclaimed gravel pit.

4 Includes barns, equipment sheds, roads, perimeter grassed areas, etc.

Land uses adjacent to the Project Site include sand and gravel quarries, agricultural fields, a closed landfill, two-solar arrays, an active freight railroad, a gun club west of the railroad, a reclaimed lumber mill, a self-storage facility, and residential homes. The southern Project Site boundary abuts the town boundary between East Windsor and South Windsor.

3.2.2 Project Description

Section 1.2 defines the Phase 1 and Phase 2 D&M Plans. Phase 2 of the Project includes the construction of solar photovoltaic arrays across an approximate 485-acre Project Area. As noted in Section 1.2, final engineering of the Project layout has been completed and is submitted to the Council for approval in this Phase 2 D&M Plan filing.

This Phase 2 D&M Plan requests approval for balance of the construction activities, which includes the installation of racking and modules, associated electrical wiring, inverters, Eversource Switchyard, GPS Substation, and continues monitoring for stormwater practices.

The Project layout is depicted on the Site Plans as provided in Exhibit A and the Project Layout Map provided in Exhibit C.

3.3 Revisions to the Project Since the Phase I D&M Plan Submission

Since filling the Phase I D&M Plan with CSC, Gravel Pit Solar has made minor revisions to the Project layout and equipment, as described further herein. These revisions were prompted by consultations with the CTDEEP Stormwater Program, CT Department of Transportation and Eversource Energy. The revisions also include refinements of the Project's design and engineering. No additional clearing or expansion of the construction work limits are proposed. These revisions include the following:

› **Changes in Schedule**

In GPS' Phase I D&M Plan, a mid-summer construction start was proposed. Delays to the schedule occurred. Currently, GPS proposes to initiate activities approved in the Council's May 21 Decision regarding the Phase I D&M Plan in January or February of 2022.

› **Selection of EPC Contractor**

GPS has selected ES Boulos as the EPC Contractor for the final design and construction of the Eversource Switchyard and Project Substation. ES Boulos has constructed numerous Eversource stations throughout Connecticut and for other utilities in New England.

GPS has not yet selected an EPC Contractor for the construction of the project solar array, however, GPS is finalizing that selection currently.

› **Changes in Project Layout**

- **Changes from Tracking Systems to Fixed Tilt Systems:** The project layout has been modified and includes more fixed tilt panels than the previous site plans. Refer to the site plans provided in Exhibit A for the location of fixed tilt and tracking systems.
- **Revised Inverter Locations:** Some inverter locations have been revised as part of the layout modification. VHB updated the Acoustic Model prepared for the Project's Application to reflect the new inverter and panel layout. The results indicate the maximum project sound level contribution increased by approximately one decibel (previously 42 and now 43 dBA) but the total overall sound level at any receptor remained at 46 dBA. Despite the relocation of some inverters closer to the Project limit of work, the sound levels at the property boundary and nearby receptors are below CT DEEP's daytime threshold of 55 dBA.
- **Modification to Access Road Alignments:** The general road layout is the same. Additional segments of roads were added for ingress and egress into the Eversource switchyard and substation. Other minor road modifications were made to provide access to the revised inverter locations. Refer to Exhibit A for Exhibit B for site plans.

- **Solar Modules:** Since the approval of the Phase 1 D&M Plan, GPS has identified LONGi LR6 and Jinko JKM modules that will be blended throughout the site. Refer to Exhibit E for the specification sheets and table below for the make, model, wattage, and approximate number.

Table 3 Solar Module Specifications

Make	Model	Watts	Approximate Number
LONGi	LR6	365	4,860
LONGi	LR6	370	27,567
Jinko	JKM	525	24,184
Jinko	JKM	530	160,664
Jinko	JKM	535	78,084

- **Substation/Switchyard Design:** Modifications of footprint and additional access roads have been identified as part of the detail engineering of the switchyard and substation facilities. Refer to Exhibit B for site plans.
- **Updates to Site Grading:** As part of the layout modification the site has been graded to reflect changes at the active gravel pit areas as well as reducing the amount of cut and fill. Refer to the Site plans (Exhibit A) for new proposed grading.
- **Updates to laydown/staging:** A construction staging area is planned directly west of the Switchyard and Substation. Refer to Exhibit A for the location of the staging area.
- **Updates to Project Fencing:** GPS proposes to use up to 8-foot-tall fencing for the Project based on commercially available fencing material. Similarly, GPS will utilize galvanized steel, non-galvanized steel or wooden fence posts based on commercial availability. Wooden fence posts will be utilized in areas of high visibility to retain the agricultural aesthetic when viewed from the adjacent roadways.
- **CT DEEP Stormwater General Permit Consultation:** GPS filed its application for a Stormwater General Permit with the CT DEEP Stormwater Division on February 18, 2021. Over the intervening months between the filing date and the approval date, GPS consulted with CT DEEP to reach mutual agreement on the Project layout and the proposed stormwater controls. The end result of these successful negotiations is a reduction in the acreage of layout of the solar array and revisions to the stormwater controls in order to meet the requirements of Appendix I of the Stormwater General Permit. CT DEEP issued a conditional approval by email from Neal Williams on September 30, 2021 (Refer to Exhibit F).

Due to changes to the Project layout and Project grading, GPS determined it to be necessary to confer with CT DEEP and solicit its review of the revised site plans and SWPCP. Revised site plans and SWPCP will be filed with CT DEEP by December 30, 2021. Based on coordination with the CT DEEP Stormwater Program, GPS anticipates a conditional approval in January 2022. The conditional approval will become fully authorized upon GPS's submission of a Letter of Credit pursuant to Appendix J of the Stormwater General Permit requirements.

- › **USACE Approved Jurisdictional Determination:** At the recommendation of Project legal counsel and after conferring with the of the U.S. Army Corps of Engineers New England District (USACE), GPS filed a request for an Approved Jurisdictional Determination (AJD) for the isolated wetlands and portions of the northern gravel pit located within the Project footprint. The Project was assigned Corps File No. NAE-2021-00600 and received a final determination indicating that wetlands 10, 11 and 15, as well as the existing processing pond and associated ditch located in the northern gravel pit are not considered Waters of the United States. Refer to Exhibit G for the AJD.

- › **Northern Capitol Disposal Facility (NORCAP) Monitoring Well Relocation:**
Gravel: In conjunction with NORCAP and its engineers from Barton & Loguidice, GPS is proposing to abandon four existing groundwater monitoring wells and replace them in-kind at alternative locations outside of the solar array. As part of this effort, the existing locations will be abandoned and decommissioned in place by industry standard practices by sealing with bentonite clay and removing the concrete collars and steel casing.

A request to undertake this replacement was submitted to DEEP Bureau of Water Protection and Land Reuse Remediation Division, and approval was received on November 24, 2021. The relocation and decommissioning of the wells are planned to be conducted in the winter/early spring of 2022. Refer to Exhibit H for the both the request to DEEP and DEEP's approval letter.

- › **CT State Historic Preservation Office:** following submission of the Project's Phase 1B Cultural Resource Survey Report to the State Historic Preservation Office (SHPO) on September 11, 2020, GPS continued to negotiate with the SHPO regarding the intended demolition and/or preservation of the 4 historic structures on the Project Site. Ultimately, GPS and the SHPO entered a Memorandum of Agreement (MOA) that outlines the agreed upon disposition of the barns. The MOA is provided as Exhibit I to this Phase 2 D&M Plan.



4

Development and Management Plan Details

The Decision & Order issued by the Council required that Gravel Pit Solar provide supplemental information regarding the GPS Project in order to ensure compliance with the RCSA Sections 16-50j-60 through 16-50j-62. Portions of the requested information were filed with GPS' Phase 1 D&M Plan in March 2021. This Phase 2 D&M Plan provides the CSC with the balance of the requested information.

Pursuant to the CSC’s Decision & Order, Gravel Pit Solar provides the following information in Table 4.

Table 4 Certificate Conditions and Responses

Certificate Condition	Response	Location within this Phase 2 D&M Plan
Submit a copy of the DEEP-issued Stormwater Permit prior to the commencement of construction.	<i>Conditional approval of the SWPCP was issued by CT DEEP on September 30, 2021. As noted above, GPS has filed updated site plans with CT DEEP and anticipates that CT DEEP will issue a revised conditional approval in January 2022. The final stormwater permit will be provided the CSC prior to construction.</i>	Exhibit F
A final site plan including, but not limited to, final facility layout, access roads, equipment pads, collector lines including crossings for Ketch Brook and Plantation Road, substation, switchyard, fence design, equipment pads, stormwater management control structures, and final site seeding	<i>Site Plans including details of the proposed Phase 1 activities and the HDD crossing of Ketch Brook and CT DOT railroad are detailed in the Phase 1 D&M Plan. Revised Site Plans are provided in this Phase 2 D&M Plan. Construction-level design for the Project array, Project Substation and the Eversource Switchyard are included as Exhibit B in this Phase 2 D&M Plan.</i>	Exhibit A Exhibit B
Erosion and sedimentation control plan consistent with the 2002 Connecticut Guidelines for Erosion and Sedimentation Control including, but not limited to, temporary sediment basin details, site stabilization seeding/growing season details prior to the installation of post driving/racking system, site stabilization measures during construction, inspection and reporting protocols, methods for periodic clearing of temporary sediment traps and swales during construction, and final cleaning of stormwater basins upon site stabilization	<i>The SWPCP, which includes the requested information, was provided in the Phase 1 D&M Plan. As noted above, due to changes in Project layout and proposed grading, a new SWPCP was developed and is provided as part of this Phase 2 D&M Plan.</i>	Exhibit A
Site construction detail/phasing plan including, but not limited to, construction laydown area, site clearing/grubbing, site grading, excess earth material disposal locations, site stabilization seeding/growing season details, soil stockpile locations, and a fuel storage/spill plan that is protective of groundwater resources	<i>Revised Site Plans including the requested information are provided in this Phase 2 D&M Plan.</i>	Exhibit A
Final Landscape Visual Mitigation Plan including, but not limited to, landscaping and other visual screening, pollinator plantings, and gate designs	<i>An updated Landscape Mitigation Plan was provided in the Phase 1 D&M Plan. There are no changes to that plan at this time.</i>	Not included

Certificate Condition	Response	Location within this Phase 2 D&M Plan
Final DEEP NDDB Determination	<i>The NDDB program issued its Final Determination of approval on February 10, 2021 and a copy was provided in the Phase 1 D&M Plan.</i>	Not included
Solar module specifications that indicate the selected solar module will not contain PFAS and will not be characterized as hazardous waste through TCLP testing	<i>The solar modules planned for the Project will not contain PFAS. TCLP testing has been conducted, and the test results are provided herein as Exhibit D of this Phase 2 D&M Plan.</i>	Exhibit D
Final Structural Design for solar module racking system stamped by a Professional Engineer duly licensed in the State of Connecticut	<i>The final design plans prepared by the EPC Contractor are included as Exhibit E in this Phase 2 D&M Plan.</i>	Exhibit E
ISO-NE FCA #15 results specific to the project	<i>The Seller is obligated to qualify and make commercially reasonable efforts to participate in the Forward Capacity Auctions. The Project was qualified and cleared an initial 1.409 MWs in FCA #15 (2024-2025). There is a remaining uncleared balance of 8.591 MW which will be offered into FCA #16 (2025-2026). With the recent change in ISO-NE rules to offer floor price for solar, the Project expects the remaining 8.591 MW to clear in FCA #16. The Project plans to try and qualify for additional capacity in subsequent FCAs.</i>	
Consultation with the DEEP Dam Safety program regarding permitting requirements, if any, for the proposed stormwater basins prior to site construction	<i>GPS consulted with CT DEEP Dam Safety. Correspondence with Dam Safety and applicable calculations were provided in the Phase 1 D&M Plan.</i>	Not included
If land control is finalized, details of the use of the secondary access road on Apothecaries Hall Road as an alternative entrance point	<i>Land control details were provided in the Phase 1 D&M Plan.</i>	Not included
Project construction hours/days of the week	<i>Typical construction days/hours will be between Monday through Friday, 7 a.m. to 5 p.m.; however, Gravel Pit Solar anticipates that weekend work and some longer hours may occur to meet critical milestones.</i>	
Construction traffic control plan developed in consultation with the Town	<i>A Traffic Management Plan describing work zone protection measures was provided in the Phase 1 D&M Plan. There are no changes to that Plan at this time.</i>	Not included
No chemicals shall be used for solar panel cleaning	<i>Chemicals will not be used to clean the solar panels.</i>	

Certificate Condition	Response	Location within this Phase 2 D&M Plan
The Certificate Holder shall provide the Council with a copy of necessary permits from any other state or federal agency with the concurrent jurisdiction prior to the commencement of construction	<i>The stormwater permit will be provided the CSC prior to construction. The USACE AJD is provided as part of this Phase 2 D&M Plan. All other state and federal permits have been provided.</i>	Exhibit G

Pursuant to the CSC’s Phase 1 Partial D&M Approval, Gravel Pit Solar provides the following information in Table 5.

Table 5 Phase 1 Partial D&M Approval Condition and Responses

Phase 1 Partial D&M Approval Condition	Response	Location within this Phase 2 D&M Plan
The name(s) of the final seed mix(es) for under and around the solar panels be submitted	<i>The area under and around the solar panels will be planted with a seed mix containing Little Bluestem (Schizachyrium scoparium), Creeping Red Fescue (Festuca rubra), Purple Lovegrass (Eragrostis spectabilis), Virginia wildrye (Elymus virginicus), Ladino clover (Trifolium repens), and Partridge Pea (Chamaecrista fasciculata).</i>	
The site contact and emergency contact information referenced in Section 5.1 of the Spill Prevention, Control, and Countermeasure Plan, including the environmental spill response contractor	<i>The final construction phase Spill Prevention, Control, and Countermeasure Plan will be provided for the responsible contractor(s) prior to commencing any construction activities and will contain this information.</i>	Not included

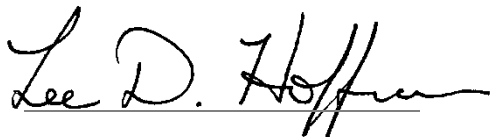


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Certification

This is to certify that on this 29th of December 2021, one original and fifteen copies of this D&M Plan were delivered via hand delivery to the Connecticut Siting Council, and one (1) copy was delivered via electronic mail to each remaining party on the service list as of the date of this filing.

Respectfully submitted,
Gravel Pit Solar

By 

Lee D. Hoffman
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103
Phone: (860) 424-4315
Fax: (860) 424-4370
Email: lhoffman@pullcom.com
Its Attorney

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References

Connecticut Department of Environmental Protection, 2004. 2004 Connecticut Stormwater Quality Manual, Hartford, CT.

Connecticut Siting Council Findings of Fact, Opinion, and Decision and Order in Docket No. 492, March 1, 2021.

Connecticut Siting Council Partial Development and Management Plan Approval in Docket No. 492, May 21, 2021.

Regulations of Connecticut State Agencies Sections 16-50j-60 through 16-50j-62.

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