Towns 10 street

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL Ten Franklin Square, New Britain, CT 06051

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VIA ELECTRONIC MAIL

July 15, 2024

Lee D. Hoffman, Esq. Pullman & Comley, LLC 90 State House Square Hartford, CT 06103-3702 lhoffman@pullcom.com

RE: **DOCKET NO. 492** - Gravel Pit Solar Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 120-megawatt-AC solar photovoltaic electric generating facility on eight parcels generally located to the east and west of the Amtrak and Connecticut Rail Line, south of Apothecaries Hall Road and north of the South Windsor town boundary in East Windsor, Connecticut and associated electrical interconnection. **Vegetation Management**

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) is in receipt of your correspondence dated July 10, 2024 regarding the application of herbicides at the the above-referenced facility site to control and prevent the spread of invasive and poisonous vegetation, including, but not limited to, Japanese Knotweed and Poison Ivy.

The Council acknowledges the application of herbicides to control toxic vegetation at the site.

Additionally, the Council notes that grass cutting and weeding at the site is required to be performed at least once annually between April and October per Section 3.2 of the Operations and Maintenance Plan dated May 2020.

Please be advised that deviations from the standards established by the Council in the Decision and Order and D&M Plan approvals are enforceable under the provisions of Connecticut General Statutes § 16-50u. Furthermore, the Certificate Holder is responsible for reporting requirements pursuant to Regulations of Connecticut State Agencies §16-50j-62.

Thank you for your attention and cooperation.

Sincerely,

Melanie A. Bachman Executive Director

MAB/MP/laf

c: Service List, dated August 7, 2020



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July 10, 2024

VIA ELECTRONIC MAIL

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

Re: Docket No. 492 - Gravel Pit Solar Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 120-megawatt-AC solar photovoltaic electric generating facility on eight parcels generally located to the east and west of the Amtrak and Connecticut Rail Line, south of Apothecaries Hall Road and north of the South Windsor town boundary in East Windsor, Connecticut and associated electrical interconnection.

Dear Ms. Bachman:

I am writing on behalf of my client, Gravel Pit Solar, LLC ("GPS"), in connection with this Docket. As you are aware, on February 25, 2021, the Council granted the Certificate for the application referenced above.

The project site historically possessed Poison Ivy and Japanese Knotweed along the edges of the adjacent tobacco fields and within patches in the gravel pits. Recently, however, these species have now spread and taken over significant portions of the project site.

The concern is two-fold. In the case of the Poison Ivy, the growth of the Poison Ivy is preventing access to certain construction areas and equipment, and causing unsafe working conditions for field electricians who must subject themselves to the Poison Ivy in order to access areas beneath panels to complete wiring work. Japanese Knotweed is a known invasive species that can quickly overtake an area and spread to other properties. As such, GPS needs to control the pervasive and persistent spread of these weeds to prevent access issues, increased maintenance obligations, and potential nuisance to adjacent owners' lands.

GPS therefore intends to use a local landscaping/vegetation management company that will be certified/licensed in accordance with applicable Connecticut regulations to apply herbicides at the

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PULLMAN & COMLEY

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project site. The herbicides will be applied on the Poison Ivy in areas where future construction work is necessary and on the Japanese Knotweed along the edge of the project fence line to prevent future spread.

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been made to all parties on the Certificate's Service List as of this date.

Sincerely,

Lee D. Hoffman

Lee D. Hoffun

cc: Service List, Docket 492