

February 28, 2020

VIA ELECTRONIC MAIL:

Ms. Jenny Dickson  
Ms. Robin Blum  
Connecticut Department of Energy & Environmental Protection  
Natural Diversity Data Base  
79 Elm Street  
Hartford, CT 06106-5127  
Email: [deep.nddbrequest@ct.gov](mailto:deep.nddbrequest@ct.gov)

Re: Revised Review Request  
Candlewood Solar LLC  
Candlewood Mountain Road, New Milford, CT  
New Milford Assessor Map Parcels 26/67.1, 34/15, 9/6, and 34/31.1  
NDDDB Review No.: #2019-11-381

## Dear Ms. Dickson and Ms. Blum:

On behalf of Candlewood Solar LLC (Candlewood Solar), this letter is being filed with the Connecticut Department of Energy & Environmental Protection (CT DEEP) Natural Diversity Data Base (NDDDB) in response to questions and comments received on February 28, 2020 on the Revised Review Request and Attachments. In the following, the NDDDB's question/comment is presented in normal typeface and the response is presented in bold typeface.

### Narrative –

- Horizontal Directional Drill (page 10) section indicates that test borings are currently being installed to determine if substrate is suitable for this technique. What is the alternative plan should it be determined that substrate is not suitable for HDD? – **Four (4) geotechnical test borings were completed on and between February 4 and 14, 2020. Based on the results of the analyses completed for each boring, HDD can be performed in this location.**
- Tree Roosting Bat Protection (page 15) – please note that, while DEEP can offer guidance, Candlewood Solar will be responsible for the cost of any additional acoustic survey work deemed necessary for the project. – **Candlewood Solar understands that they will be responsible for the cost associated with any acoustic survey work required for the Project.**
- Slimy Salamander Protection, Conservation and Mitigation (page 16) - the first paragraph under this header needs clarification. The project as originally proposed results in a direct impact, for which the Incidental Take Report and mitigation measures were agreed to and accepted. The revisions to the project result in additional impact, and therefore additional mitigation measures are needed. The current language in this paragraph leaves it a bit unclear that there was already an Incidental Take process and Report completed for this project in its original submission. – **Candlewood Solar accepts NDDDB's comment.**



### State Threatened *Plethodon glutinosus* (slimy salamander) Mitigation Plan

- Section 3. Conservation Easement Area – Please clarify the acreages involved in the revisions to the original 100-acre proposed area. The new proposal both removes and adds some new acreage (yellow on figure 2, blue on figure 3), but it's unclear if the removals equal the additions, keeping it at 100 acres (not including the additional 20 acres outlined in green on figure 4) and therefore 120 acres for the entire newly proposed area. Figure 3 appears to reflect the final area (pink); the legend has it labeled as 110 acres. – **The total acreage removed from the approved 100-acre conservation easement is approximately 17 acres (depicted by red hashing and labeled Proposed Area to be Removed from Conservation Restriction in the legend in Figure 3 included in the Mitigation Plan). The currently proposed revised 100-acre conservation easement is depicted in blue hashing in Figure 4 included in the Mitigation Plan. The area covered by green hashing in Figure 4 is the proposed new 20-acre area to be included in the conservation easement. The area covered by blue and green hashing depicted in Figure 4 of the Mitigation Plan identify the proposed 120-acre conservation easement.**
- Section 4. 5 Year Targeted Research Program – Our January meeting did not include a deadline for developing specifics of the research goals protocols; but, in order to keep this moving forward, it should be developed in time for field season. – **Candlewood Solar is continuing work on the Post Construction 5 Year Research Program. As the specifics of the research goals protocols are developed for each component of the Post Construction 5 Year Research Program, Candlewood Solar will submit drafts to NDDB for review and comment in order to keep things moving forward and be developed in time for the first field season following construction.**
- Section 6. In Right-of-Way and Buffer Zone Conservation Measures (page 9) – references the HDD segment; should include alternative should HDD be deemed inappropriate for this area. – **Please see response to Narrative bullet 1 above.**
- Section 6. In Right-of-Way and Buffer Zone Conservation Measures (page 10) – erosion control blankets must be natural fiber only (no plastic) – **Candlewood Solar will comply with this requirement.**

### Invasive Species Control Plan

- Introduction – DEEP expects 10 years (growing seasons) post-construction of monitoring and treatment. – **Candlewood Solar will comply with this requirement.**
- Plan – Item 11 Site Restoration (page 4-4) - erosion control blankets must be natural fiber only (no plastic). – **Candlewood Solar will comply with this requirement.**
- Monitoring and Management – page 6.1, introductory paragraph - DEEP expects 10 years (growing seasons) post-construction of monitoring and treatment. – **Candlewood Solar will comply with this requirement.**
- Chemical Control – due to concerns about toxicity to salamanders, please consult with DEEP before selecting/utilizing chemicals. – **Candlewood Solar will comply with this requirement.**
- Annual monitoring report (page 6-3) – this report will be due by December 31<sup>st</sup> of each year. – **Candlewood Solar will comply with this requirement.**
- Also, there are additional references to 5 year monitoring (and a potential 6<sup>th</sup> year of monitoring); these should be updated to reflect the change to 10 years of invasive monitoring and control. – **Candlewood Solar will comply with this requirement.**

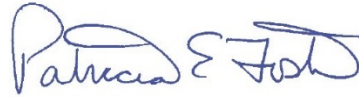
Should you have any questions, please do not hesitate to contact Mr. Rob Bukowski at (978) 392-5307; [rob.bukowski@woodplc.com](mailto:rob.bukowski@woodplc.com) or Ms. Tricia Foster at (508) 840-9609; [tfoster@epsilonassociates.com](mailto:tfoster@epsilonassociates.com).

Sincerely,

**Wood Environment & Infrastructure Solutions, Inc. and Epsilon Associates, Inc.**



Robert J. Bukowski, P.E.  
Project Manager



Tricia Foster  
Senior Scientist

cc: R. Jackson, Candlewood Solar LLC  
M. Daigneault, Candlewood Solar LLC