

March 3, 2020

Tricia Foster
Wood Environment & Infrastructure Solutions, Inc.
271 Mill Road, 3rd Floor
Chemsford, MA 01824
Tricia.foster@woodplc.com

Project: Proposed Candlewood Solar Project with Revised Interconnection Route, Candlewood Mountain road and Kent Road, New Milford, CT
NDDB Determination #201911381

Dear Tricia Foster,

In conjunction with your request for a Natural Diversity Database Determination for the above referenced project, including the Revised Interconnection Route, the following documents were submitted to and reviewed by Wildlife Division staff:

- Habitat Assessment Report for the Candlewood Solar Interconnect Project – November 13, 2019
- Habitat Survey and Mitigation Proposal – Electrical Interconnect Routing Alternative – December 13, 2019

Subsequent to this review, a meeting was held on January 23, 2020 with DEEP Agency staff, Candlewood Solar project representatives, and consulting biologists, in order to discuss and finalize the remaining issues that need addressing.

In response, a Revised Review Request was submitted on February 7, 2020, which included the State Threatened *Plethodon glutinosus* (slimy salamander) Mitigation Plan, February 7, 2020, which provides responses to the issues raised at the January meeting.

This Determination addresses specifically the issues raised by the revised project scope, including the revised interconnection route and the revised conservation easement area as described in the State Threatened *Plethodon glutinosus* (slimy salamander) Mitigation Plan. All remaining measures agreed to and documented in the *Incidental Take Report for the State Threatened Plethodon glutinosus (northern salamander)* and associated amendments and maps, as well as additional conservation measures described in NDDB Determination 201703524 are still applicable and required to be implemented.

Tree Roosting Bats:

NDDB Determination 201703524 indicated that, in order to limit impacts to tree roosting bats, tree clearing should only occur between November 1st and March 30th. Candlewood Solar has proposed extending this window; this was further discussed at the January 23, 2020 meeting, and DEEP is willing to work with Candlewood Solar on this timeline. CT DEEP will share existing data and provide guidance

on additional acoustic monitoring work that may be required in order to appropriately address tree clearing timelines. Per communication between DEEP and Wood Environmental on February 28, 2020, Candlewood Solar understands that they will be responsible for the cost associated with any acoustic survey work undertaken as a requirement for the project. To allow for bat acoustic survey work to be implemented if necessary, further communication on this element will occur during the months of March, April, and May of 2020 or as appropriate based on the adjusted tree clearing and construction timeline.

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

The plan is comprised of three main components:

- Revised conservation easement area – The Plan revises the original 100-acre conservation areas with both removals and additions. Communication between DEEP and Wood Environmental on February 28, 2020 clarifies that the final conservation easement proposed is 120 acres. Program staff have reviewed maps demarcating the revised conservation area and concur that these changes are acceptable.
- Five-year targeted research program – DEEP concurs that the goals and approach to the 5-Year Targeted Research, as outlined in the State Threatened *Plethodon glutinosus* (slimy salamander) Mitigation Plan, February 7, 2020 are appropriate and acceptable. Communication between DEEP and Wood Environmental on February 28, 2020 clarifies that Candlewood will work with DEEP wildlife biologists to develop a detailed research and monitoring plan. The approved plan will be submitted to the NDDB and will be included as part of the project requirements. The plan must be fully developed in time for the first post-construction field season.
- Invasive species control plan – DEEP concurs that the invasive species plan, as proposed in the State Threatened *Plethodon glutinosus* (slimy salamander) Mitigation Plan, February 7, 2020 and revised in communications between DEEP and Wood Environmental on February 28, 2020, are acceptable. Note that the revisions include:
 - A change from the proposed 5 years to 10 years of monitoring and treatment
 - Limiting erosion control blankets to natural fiber only
 - Consultation with DEEP prior to selecting and utilizing chemical herbicides
 - A December 31st due date for submission of annual reports

DEEP concurs that State Threatened *Plethodon glutinosus* (slimy salamander) Mitigation Plan, as submitted on February 7, 2020, with the revisions and clarifications noted above, is acceptable to mitigate for the additional impacts to state listed species stemming from project scope changes, specifically, the interconnection revision.

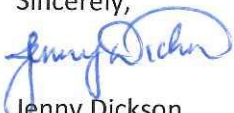
This NDDB Determination for the Proposed Candlewood Solar Project with Revised Interconnection Route, as described in the submitted information is valid for two years. This determination applies only to the project as described in the submission. Please submit an updated Request for Review if there are additional changes to the project's scope of work and/or timeframe, including if work has not begun by March 3, 2022.

Natural Diversity Database information includes all information regarding listed species available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, land owners, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of

concern, as well as enhance existing data. Such new information is incorporated into the Database and as it becomes available. New information may result in additional review, and new or modified restrictions or conditions may be necessary to remain in compliance with certain state permits.

- During your work listed species may be encountered on site. A report must be submitted by the observer to the Natural Diversity Database promptly and additional review and restrictions or conditions may be necessary to remain in compliance with certain state permits.
- Your project involves the state permit application process or other state involvement, including state agency actions; please note that consultations with your permit analyst or other Agency Divisions may result in additional requirements. In this situation, additional evaluation of the proposal by the DEEP Wildlife Division may be necessary and additional information, including but not limited to species-specific site surveys, may be required. Any additional review may result in specific restrictions or conditions relating to listed species that may be found at or in the vicinity of the site.

Sincerely,



Jenny Dickson
Director, Wildlife Division
(860) 424-3114
Jenny.dickson@ct.gov