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February 22, 2021

VIA ELECTRONIC MAIL

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

Re: Petition 1313 – Petition of DWW Solar II, LLC for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is Required for a 26.4 Megawatt AC Solar Photovoltaic Electric Generating Facility in Simsbury, Connecticut

Dear Ms. Bachman:

I am writing on behalf of my client, DWW Solar II, LLC (“DWW”), in response to your February 1, 2021 correspondence which identified issues associated with the landscaping and barns at the Tobacco Valley Solar Project (“Project”) that was the subject of the above-referenced Petition. Detailed responses to the concerns raised in that letter, with respect to both landscaping issues and barn repair are addressed in greater detail below.

Landscaping Issues and Response

With respect to landscaping issues, DWW recognizes its obligations pursuant to Exhibit L of the Project’s D&M Plan. In fact, DWW previously conducted a survey of vegetation that did not survive the 2019-2020 winter season and replaced that vegetation in the fall of 2020, with completion of that vegetation project in November of 2020.

The Project recognizes, however, that there has been additional die-off of the Project’s landscaping. Representatives of the Project walked the perimeter fencing near Hoskins Road and in other locations at the Project site and compiled more than 100 photos documenting the condition of the vegetation at the Project site. Given the volume of data in these photos, they are too large for transmission by e-mail. They can, however, be accessed through a Share File link, which is located at: <https://pullcom.sharefile.com/d-s377e61f6f4eb433e8d6822162a86f135>

As one can imagine, the snow cover and winter season makes documenting the health of the landscaping somewhat difficult. However, the Project has been able to make some preliminary

Page 2

determinations despite the adverse conditions. As is documented in the photos contained in the Share Link, there is an indeterminate number of plants that are dying or dead, some that have lost their leaves due to the season but are expected to survive the winter, and some that are in healthy condition. One can more readily ascertain the health of the evergreens that are in the pictures since they do not lose foliage during winter. The rhododendron plants, however, are more difficult to assess at this time since there is some winter leaf loss. Some of the rhododendron that show leaf loss have observable buds on them, and others appear to be lush and vibrant. All of this is documented in the pictures that the Project is providing. The Project would note, however, that some of these plants appear to have died over the course of the winter.

It should also be noted that during the Project's review of the foliage at the site, there was evidence of snowmobile and possible ATV tracks in the area. It appears that several of the plantings have been adversely affected by this traffic.

The Project does not believe a fully accurate landscape mortality review can be completed until spring arrives and the Project can determine which plantings have successfully overwintered. To address the Council's concerns, the Project proposes to undertake the following activities on the following schedule:

- In April and/or May (depending on weather conditions), complete an inventory of the vegetation that did not survive the winter;
- Replace vegetation where possible in the spring, before conditions become inhospitable to new plantings; and
- If necessary, make additional plantings in the fall if full plantings in the spring are not possible.

The Project proposes to provide the Siting Council with an update by May 31, 2021 of the findings of its inventory, and an update by June 30, 2021 of the status of its vegetation replacement. If the Project is not able to replace all dead vegetation by June 30th, the Project will provide a supplemental report to the Siting Council by November 30, 2021 documenting its fall planting regime. In future years, the Project will conduct a planting inventory on an annual basis each spring, evaluate which plantings did not survive the winter, and devise a replacement strategy and timeline based on the result of the annual inventory.

Barn Maintenance Issues

The Project is aware of the maintenance issues at the barns on the site, however, as with the landscaping issues, the current weather and site conditions preclude the Project from making repairs to the barns on the site. Moreover, the Project believes that it should address both short-term maintenance/repair issues for the barns as well as longer-term preservation issues.

Page 3

For the longer-term barn preservation, the Project is waiting to determine if the Siting Council will approve the project in East Windsor, Connecticut, commonly known as Gravel Pit Solar, that is currently being considered in Docket No. 492. As the Council is well-aware, there are several barns at the Gravel Pit Solar site that will be dismantled if the Council approves the Gravel Pit Solar project in accordance with the Application in Docket No. 492. Rather than dispose of the barn materials from the Gravel Pit Solar site, it is the Project's goal to reuse the materials from the Gravel Pit Solar barns to repair and restore the barns on the Tobacco Valley Solar site. This will allow the Tobacco Valley Solar Project to repair and restore the barns on its site using historically similar materials to the barns that are located at the Tobacco Valley Solar site.

Reusing such similar materials will help preserve the historic look of the barns and will result in a better outcome from both a visual and historic preservation perspective. Unfortunately, such restoration will likely take more than a year to complete. The Project understands that the barns cannot be left unrepaired for such a long period of time and is therefore planning to take steps to repair the barns as soon as weather conditions allow. While such repairs will not utilize historic barn materials, they will ensure the physical integrity of the barns in the short term and will improve their visual aesthetic from current conditions.

To that end, the Project proposes to undertake the following activities for each barn:

The 220' x 40' barn near SB 4

- Replace and secure the doors on the south and west ends of the barn;
- Repair and secure the doors on the north end of the barn;
- Patch holes in all four sides of the barn; and
- Evaluate the condition of the east side of the barn's roof and either patch the holes in this portion of the roof or replace the east side of the barn roof in its entirety.

The 100' x 40' barn near SB 5

- Remove vegetation around the barn;
- Replace and secure the door on the south end of the barn;
- Repair and secure the doors on the north end of the barn;
- Patch holes in all four sides of the barn; and
- Patch the small hole in the east side of the barn's roof.

The 150' x 40' barn near SB 15

- Remove vegetation around the barn;
- Repair and secure the doors on the east and west end of the barn;

Page 4

- Patch holes in all four sides of the barn; and
- Evaluate the condition of the south side of the barn's roof and either patch the holes in this portion of the roof or replace the south side of the barn roof in its entirety.

The 70' x 26' barn near SB 16

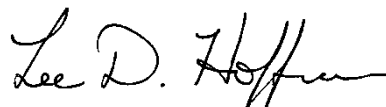
- Remove vegetation around the barn;
- Repair and secure the doors on the east and west end of the barn;
- Patch holes in all four sides of the barn;
- Place new jack studs and sister beams in the barn to repair the barn's structure; and
- Evaluate the condition of the south side of the barn's roof and either patch the holes in this portion of the roof or replace the south side of the barn roof in its entirety.

It is anticipated that this work will take several months to complete, once the weather permits such construction activity. As such, the Project requests that it be permitted to begin this work in the spring and provide an update to the Siting Council no later than June 30, 2021 to advise the Council of the Project's progress on the short-term repairs of the barns. If additional time is needed to complete these short-term repairs, the Project will so advise the Council in its June 30th update. By June 30, 2021, the Project will also be in a position to advise the Council as to how it will best incorporate historic materials into the longer-term repairs and preservation of the barns.

We anticipate that this response fully addresses the concerns enumerated by the Council in its February 1, 2021 letter to the Project. If the Council would like additional detail concerning this response, or if the Council would like the Project to conduct its activities on a different timeline, the Project requests that representatives of the Council contact the undersigned so that such issues may be further addressed.

If you have any questions concerning this submittal, please contact the undersigned at your convenience. I certify that copies of this submittal have been submitted to the Service List for this Petition that is in effect as of the date of this letter.

Sincerely,



Lee D. Hoffman