



Melanie A. Bachman
Acting Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition NO. 1345 - Site Clearing (Initial Development & Management Plan)

Dear Melanie:

I'm writing to request that the Connecticut Siting Council reviews the initial phase of the project's Development and Management Plan for site clearing activities for the North Stonington Solar project located at Ella Wheeler Road. On October 25, 2018 the Connecticut siting council approved Photovoltaic Electrical generation facilities located on four sites located at Boombridge Road, 36 Ella Wheeler Road, Ella Wheeler Road and 36 Pendleton Hill Road North Stonington, Connecticut as referenced in petition NO. 1345. The attached clearing plan illustrates all trees and brush to be removed from the site in preparation of full development of the solar facility which excludes all selective wetland clearing and grubbing until full permit is approved. The project's proposed limit of disturbance is consistent with the approvals previously granted. The clearing limits illustrated in the attached plan represent the development footprint required for a final site design consistent with the 2002 CT guidelines for Erosion and Sediment control and the 2004 Connecticut Stormwater Quality manual. The projects final grading and erosion control plan and associated SWPCP is currently under design and will be submitted to CT-DEEP for the projects Stormwater Construction permit once final designs are completed for phase two of the work.

Per the requirements of the Stormwater Construction permit no grading or grubbing of the site will occur until DEEP approval of the final SWPCP. This initial request for clearing activities is primarily based on wildlife studies regarding the Red Wing Bat (See attached document from NDDb) and

Building a Cleaner Future



CONNECTICUT: 860-261-0444

PHONE 800-645-2400

INFO@CSENERGY.COM

cseenergy.com



correspondence from Dawn M. McKay allowing a tree clearing window until April 30, 2020. Attached with this submission are updated Natural Diversity Data Base (NDDB) review letters from CT-DEEP. These letters illustrate that there are no negative impacts anticipated from our proposed activities. CS Energy is requesting that the Connecticut Siting Council reviews the attached documents at the April 9th, 2020 meeting or sooner where allowable to approve this request for tree and brush clearing of the proposed facility. If you should have any questions, please don't hesitate to reach out.

Thank you,

Logan Black
Project Manager

CS Energy

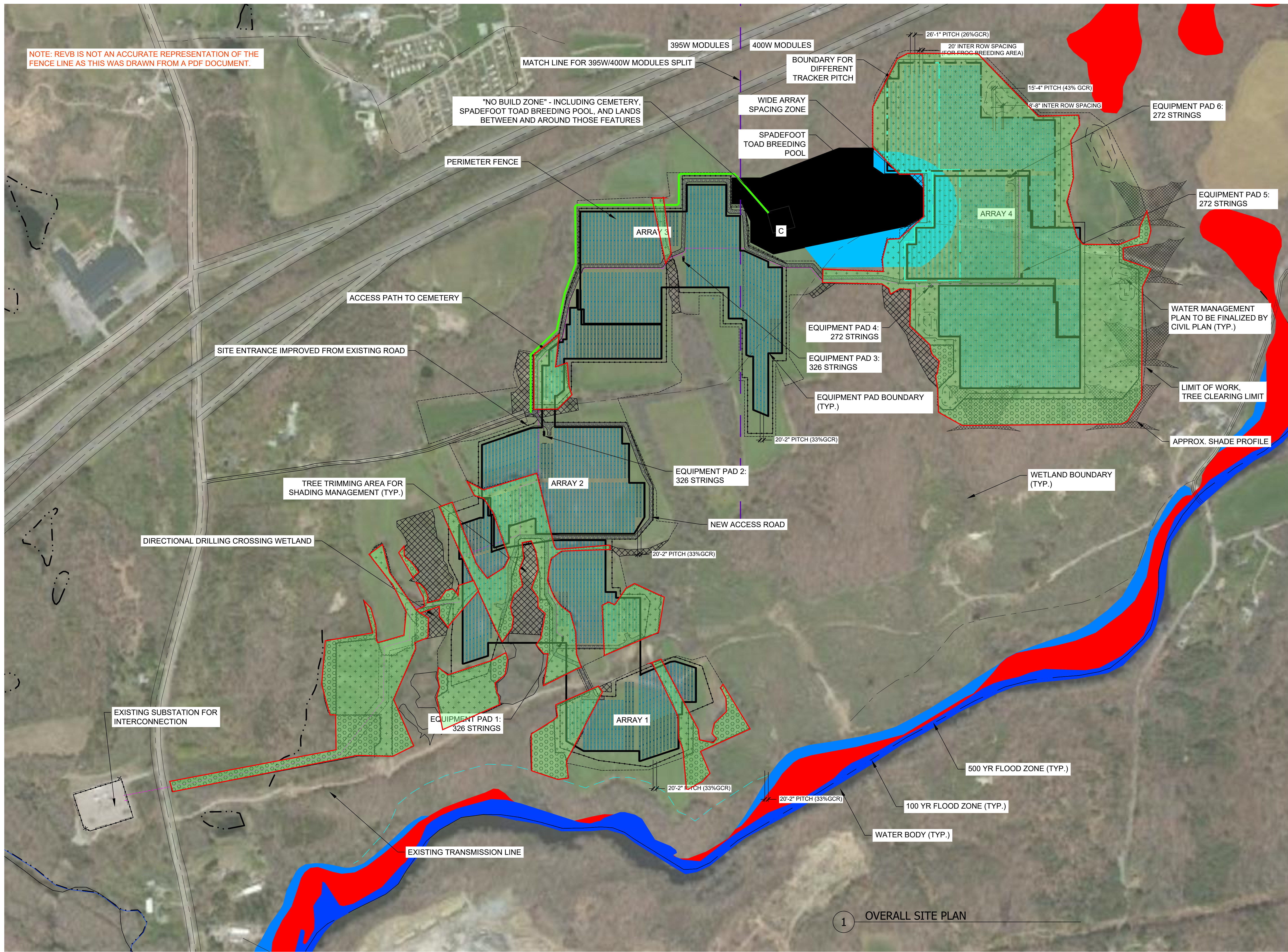
100 Grove St | Suite 315 | Worcester, MA 01605

C 732.425.7576

lblack@csenergy.com

csenergy.com

NOTE: REV B IS NOT AN ACCURATE REPRESENTATION OF THE FENCE LINE AS THIS WAS DRAWN FROM A PDF DOCUMENT.



SYSTEM SUMMARY

STRING QTY.	1,794
MODULES / STR	28
MODULE QTY.	50,232
TOTAL DC SIZE	19.97 MW
AZIMUTH	180°
GCR	43% OR 33% OR 26%
RACKING	TRK-1H

MODULE SPLIT

MODULE	JINKO 395
STRING QTY.	897
MODULES / STR	28
MODULE QTY.	25,116
MODULE	JINKO 400
STRING QTY.	897
MODULES / STR	28
MODULE QTY.	25,116

REV	DESCRIPTION	DATE
A	INITIAL 10% SET SUBMISSION	01/10/20
B	UPDATED LAYOUT PER SITING PLAN	03/05/20
C	90% SET SUBMISSION	03/09/20
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-

CONFIDENTIAL:
THE INFORMATION DEPICTED ON THIS DOCUMENT IS PROPRIETARY AND THE SOLE PROPERTY OF ENERPARC, INC. ANY USE OR DISCLOSURE OF THIS INFORMATION IS EXPRESSLY PROHIBITED WITHOUT THE PRIOR WRITTEN CONSENT OF ENERPARC, INC.



PROJECT NAME:
NORTH STONINGTON

PROJECT ADDRESS:
**ELLA WHEELER RD,
NORTH STONINGTON, CT 06359
41°25'9.71"N, 71°50'4.83"W**

SEAL:	DATE: 03/09/2020
	PROJECT #: 2000500
	DRAWN BY: V. PISSAREVSKI
	CHECKED BY: R. VUDI

TITLE:
OVERALL SITE PLAN

SHEET:
E-100

1 OVERALL SITE PLAN

FW: North Stonington Solar: NBBB Determination #201908729

Logan Black <lblack@csenergy.com>

Thu 3/12/2020 8:22 AM

To: Keith Anderson <kanderson@csenergy.com>

From: DEEP Nddbrequest <DEEP.Nddbrequest@ct.gov>

Sent: Monday, March 9, 2020 11:36 AM

To: Gregson Pullen <gpullen@csenergy.com>

Cc: Logan Black <lblack@csenergy.com>; Yuvraj Kshirsagar <ykshirsagar@csenergy.com>; Matthew Skidmore <mskidmore@csenergy.com>

Subject: Re: North Stonington Solar: NBBB Determination #201908729

Gregson,

You can attach my email with the permit application with the revised time of year restriction.

Take care,

Dawn

Dawn M. McKay

Wildlife Division

Bureau of Natural Resources

Connecticut Department of Energy and Environmental Protection

79 Elm Street, Hartford, CT 06106-5127

P: 860.424.3592 | E: dawn.mckay@ct.gov

From: Gregson Pullen <gpullen@csenergy.com>

Sent: Monday, March 9, 2020 9:16 AM

To: DEEP Nddbrequest

Cc: Logan Black; Yuvraj Kshirsagar; Matthew Skidmore

Subject: RE: North Stonington Solar: NBBB Determination #201908729

Dawn,

Thank you for taking the time to consider the matter. CS is committed to preserving and protecting our environment and we are glad that we can proceed with the clearing until May 1st without endangering the Red Bats.

We are going to submit a SWPCP this week and will submit the NDDB determination along with it. We are wondering whether we will need your new determination in an official letter. Do you think that will be required?

Once again thank you,

Gregson Pullen

Assistant Superintendent

CS Energy

2045 Lincoln Highway | Edison, NJ 08817

C 732 395-9464

gpullen@csenergy.com

csenergy.com

From: DEEP Nddbrequest <DEEP.Nddbrequest@ct.gov>

Sent: Friday, March 6, 2020 3:25 PM

To: Gregson Pullen <gpullen@csenergy.com>

Cc: Logan Black <lblack@csenergy.com>; Yuvraj Kshirsagar <ykshirsagar@csenergy.com>; Matthew Skidmore <mskidmore@csenergy.com>

Subject: Re: North Stonington Solar: NBBB Determination #201908729

Gregson,

I can modify the requirements for bats to reflect this new timeline:

To avoid negative impact to bats during the breeding season, avoid tree cutting between May 1st and September 1st.

I hope this helps your project timelines.

Take care,

Dawn

Dawn M. McKay

Wildlife Division

Bureau of Natural Resources

Connecticut Department of Energy and Environmental Protection

79 Elm Street, Hartford, CT 06106-5127

P: 860.424.3592 | E: dawn.mckay@ct.gov

From: Gregson Pullen <gpullen@csenergy.com>

Sent: Friday, March 6, 2020 12:34 PM

To: DEEP Nddbrequest

Cc: Logan Black; Yuvraj Kshirsagar; Matthew Skidmore

Subject: Re: North Stonington Solar: NBBB Determination #201908729

Good Afternoon,

Thank you for agreeing to review the forest inventory summary. I am sure you are very busy and we appreciate you taking time to review this matter.

Because of the time sensitive nature of this project in particular, we politely ask what timeframe this review will happen. We will need to make quick decisions as a result and hope that you can give us an idea of how long the review will take.

Thank you once again,

Greg Pullen
CS Energy
732-395-9464

Sent from my iPhone

On Mar 5, 2020, at 3:34 PM, DEEP Nddbrequest <DEEP.Nddbrequest@ct.gov> wrote:

Gregson,

I will review the summary and get back to your soon. Thank you.

Take care,

Dawn

Dawn M. McKay
Wildlife Division
Bureau of Natural Resources
Connecticut Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106-5127
P: 860.424.3592 | E: dawn.mckay@ct.gov

From: Gregson Pullen <gpullen@csenergy.com>
Sent: Thursday, March 5, 2020 2:02 PM
To: DEEP Nddbrequest
Cc: Logan Black; Yuvraj Kshirsagar
Subject: North Stonington Solar: NBBD Determination #201908729

Hello NDDDB Team,

Good afternoon, this is Greg Pullen with CS Energy, general contractor, for the North Stonington Solar Project. As per my conversation with Dawn McKay yesterday (3/4/2020) with regards to the North Stonington Solar Project (NDDDB Determination #: 201908729), listed below is the forest inventory created by Matthew Gustafson, who has a B.S. in Forestry from University of Vermont. It was generated during the Environmental Report created by All Points Technology in May 2019. Dawn indicated that she would look at the percent cover of suitable red bat roosting habitat, as it may affect the window of acceptable tree clearing days. We politely request the NDDDB team to consider the information below to determine if it would be safe for the Red Bat population to expand the cutting window.

We also ask to please note that we are not planning to do any selective clearing during the bat roosting season in the wetland areas. We highlight this as it is

stated in the forestry report that the mature maples are predominately found in the wetland areas. Therefore the percent cover of red maple listed in the table below would not be affected.

Please advise if this is acceptable as per Dawn McKay's request and/or if any additional information is required.

The Site's upland forest is primarily composed of mature even aged forest dominated by a mix of two separate cover types: Eastern White Pine and Red Oak/White Oak/Black Birch. The Eastern White Pine block occurs in the east central portion of the Site, within an inclusion of the larger Red Oak/White Oak/Black Birch cover type and consists of Eastern White Pine dominant mature overstory with a sparse scrub/shrub growth in the understory. The remaining upland forested areas are dominated by the Red Oak/White Oak/Black Birch cover type with inclusion of American beech. Consisting of primarily closed canopy, even-aged forest this hardwood cover type includes sparse to moderate understory growth, dominated by a mix of saplings of the overstory dominant species, high-bush blueberry, and spicebush.

Forest metric data was collected using prism plot survey's for both upland forest cover types and the wetland forest cover type (See discussion below), including average tree height, species diversity, and trees per acre. Average tree height was recorded at 70 to 85 feet. The number of trees per acre was calculated at 140 trees^[1] per acre averaged between both upland forest cover types and the wetland forest cover type (weighted by proportional area). The average diameter at breast height of these surveyed trees ranged from 6 to 25 inches with primarily two age/size classes present (6-12" and 12-22"). The forested areas surveyed were observed to be in good health with little evidence of widespread deleterious forest pest/pathogens present and few standing dead trees (estimated at <5 per acre). The table below details the percent cover of each species surveyed during the prism plot cruise.

Larger diameter trees (12-inch DBH and larger) are more valuable to Red Bat, particularly trees that have loose, rough bark such as maples, hickories, and oaks. Therefore, only the oaks would provide optimal roosting habitat for Red Bat since red maple would be predominately found in the wetland areas.

Species	Tree/acre	Percent Cover
White Oak	14.34715	10.3
Red Oak	29.97109	21.5
Red Maple	30.15678	21.7
EWP	7.733423	5.6
Beech	12.37066	8.9
Black Birch	40.81528	29.3
Green Ash	1.1318	0.8
Black Gum	2.263601	1.6
American Elm	0.458379	0.3
Total	139.2482	100

[1] Trees with 6" or greater diameters at breast height.

Thank you for the additional consideration,

Gregson Pullen
Assistant Superintendent

CS Energy
2045 Lincoln Highway | Edison, NJ 08817
C 732 395-9464
gpullen@csenergy.com
csenergy.com

[1] Trees with 6" or greater diameters at breast height.