

Attachment D



July 28, 2020

Ref: 42496.00

Jean-Paul La Marche
Development Director
Greenskies Clean Energy
363 Centennial Parkway, Suite 105
Louisville, CO 80027

Re: CT Siting Council Petition No. 1347A - GRE GACRUX LLC
Eastern Ribbon Snake Protection Measures Protocol
16.78 MW-AC Solar Project
117 Oil Mill Road, Waterford, Connecticut

Mr. Jean-Paul La Marche,

In response to the Connecticut Siting Council (CSC) memorandum, dated July 16, 2020, which documented additional late-filing exhibits to be submitted, Vanasse Hangen Brustlin, Inc. (VHB) is pleased to provide the following details on a monitoring protocol for the Eastern Ribbon Snake.

Eastern Ribbon Snake (*Thamnophis sauritus*) Monitoring Protocol- State Special Concern

As noted in the Connecticut Department of Energy and Environmental Protection (CTDEEP) Natural Data Base Diversity (NDDB) Determination letter, dated February 28, 2020, recommendations to protect the state special concern species- eastern ribbon snake will include protection measures including the following:

- 100 feet no disturbance buffer to wetlands.
- No planned disturbance within the utility Right-of-Way.
- Limited disturbance in the 100 to 200-foot wetland buffer in order to install the soil erosion and sedimentation measures, grading and installation of stormwater management measures (e.g., swales and basins).
- For proposed activities occurring within the 300-foot wetland buffer of Wetland 1 during the snake's active season (April 1- Oct 15), the following avoidance measures will be implemented:



- A contractor awareness program will be developed and implemented to ensure that contractors working in the area have been instructed on the proper response in the event that an eastern ribbon snake is observed in the work area.
- If any snakes are observed, construction personnel will safely relocate them to an area immediately outside of the work area.
- Any silt fence utilized will be removed after clearing is complete and soils are stabilized.
- Any confirmed eastern ribbon snake sightings will be reported to the NDDb.

In order to make contractors aware of the snakes an Eastern Ribbon Snake education/training session will be administered to the contractor by a qualified biologist. The biologist will verbally describe:

- Life History and Importance of Protection,
- Species Identification, and
- Protection Methods:
 - Safe Handling,
 - Translocation,
 - Biologist Contact Information, and
 - Reporting Requirements.

The above information including photographs of the snake will assist in the identification and serve as a reminder of the need for Eastern Ribbon Snake Protection will also be compiled into a written document that will be provided to the contractor.

Please feel free to contact me with any questions, comments or require additional information.

Sincerely,

Vanasse Hangen Brustlin, Inc.

A handwritten signature in black ink, appearing to read "J. Shamas", with a large, stylized loop at the end.

Jeffrey R Shamas

Director of Environmental Services
jshamas@vhb.com