

Lee D. Hoffman

90 State House Square Hartford, CT 06103-3702 p 860 424 4315 f 860 424 4370 <u>lhoffman@pullcom.com</u> www.pullcom.com

March 26, 2020

VIA ELECTRONIC MAIL

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

Re: Petition 1347A - GRE GACRUX LLC Petition for a Declaratory Ruling, Pursuant to Connecticut General Statutes §4-176 and §16-50k, for the Proposed Construction, Maintenance and Operation of a 16.78 MW AC Solar Photovoltaic Electric Generating Facility Located at 117 Oil Mill Road and Associated Electrical Interconnection to Eversource Energy's Existing Substation at 325 Waterford Parkway North in Waterford, Connecticut. Reopening of this Petition Based on Changed Conditions Pursuant to Connecticut General Statutes §4-181a(b).

Dear Ms. Bachman:

I am writing on behalf of my client, GRE GACRUX LLC ("Greenskies"), in connection with the above-referenced Petition. At a March 265 2021 meeting of the Siting Council, the Siting Council approved the D&M Plan Greenskies submitted, however, the Council placed several conditions on that approval. Based on those conditions, Greenskies is required to:

- 1. Amend its Spill Prevention, Control and Countermeasure (SPCC) Plan;
- 2. Provide detail for the proposed switchgear/inverter pads and the underground feeder cable/trench;
- 3. Provide methods for periodic cleaning of temporary sediment traps and swales during construction, and final cleaning of stormwater basins upon site stabilization; and
- 4. Provide final seed mix specifications.

These requirements will be discussed in turn.

Amendment of the SPCC Plan

Greenskies has amended its SPCC Plan in accordance with the comments that were discussed at the March 25th meeting. The amended SPCC Plan is enclosed with this letter.

pullcom.com Bridgeport Hartford Stamford Waterbury Westport White Plains

Detail for the Proposed Switchgear/Inverter Pads and Underground Feeder Cable/Trench

As an initial matter, the switchgear/inverter pads and the unground feeder cable/trench will not be installed during the first phase of construction, which this D&M Plan submittal was designed to address. Therefore, details regarding these construction pieces may change when Greenskies submits its second phase D&M Plan. That having been said, the details being sought by the Siting Council are contained in the drawings that are enclosed with this letter.

Methods for Periodic Cleaning of Temporary Stormwater Features During Construction and Final Cleaning of Stormwater Basins Upon Site Stabilization

The maintenance and cleaning of temporary sediment traps and swales during construction, as well as the final cleaning of stormwater basins upon site stabilization would follow the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control. More specifically, during construction the following steps will be taken to ensure proper operation and maintenance of these stormwater features:

- Inspect the temporary sediment trap at least once a week and within 24 hours of the end of a storm with a rainfall amount of 0.5 inch or greater.
- Check the outlet to ensure that it is structurally sound and has not been damaged by erosion or construction equipment
- The height of the stone outlet will be maintained at least 1 foot below the crest of the embankment.
- Sediment accumulation and filtration performance will be performed on a routine basis to ensure proper performance.
- When sediments have accumulated to one half the minimum required volume of the wet storage, the trap will be dewatered as needed; sediments will be removed, and the trap will be restored to its original dimensions.
- Sediments removed from the basin will be disposed in a suitable area and in such a manner that it will not erode and cause sedimentation problems.
- It is anticipated that accumulated sediment during construction, and at the end of construction, will be removed from the basins by use of an excavator, as is standard practice in Connecticut. For the basins proposed to be installed under solar panels, it is anticipated that accumulated sediment will be removed by hand or with the assistance of smaller excavating equipment.

Final Seed Mix Specifications

The seed mix used for the facility will consist of approximately:

40% Creeping Red Fescue

30% Hard Fescue

10% Chewings Fescue

10% Kentucky Bluegrass

10% A combination of White Clover, Partridge Pea, New England Aster, and Evening Primrose

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been made to all parties on the Petition's Service List as of this date.

Sincerely,

Lee D. Hoffman

Lee D. Hoffun

Enclosures