



Jesse A. Langer
(t) 203.786.8317
(f) 203.772.2037
jlanger@uks.com

April 30, 2020

***VIA ELECTRONIC MAIL
AND FEDERAL EXPRESS***

Melanie.bachman@ct.gov
Siting.council@ct.gov

Ms. Melanie A. Bachman, Esq., Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Petition of CP East Hampton Solar I, LLC and CP East Hampton Solar II, LLC for a Declaratory Ruling that a Certificate of Environmental Compatibility and Public Need is not Required for the Construction, Operation and Maintenance of a 1 MW AC and A 0.975 MW AC Solar Photovoltaic Electric Generating Facility Located off of Skinner Street in East Hampton, Connecticut.

Dear Attorney Bachman:

This office represents CP East Hampton Solar I, LLC and CP East Hampton Solar II, LLC ("Petitioners"). On behalf of Petitioners, and per your correspondence dated April 15, 2020, I have attached Petitioners' response to the Second Set of Interrogatories propounded by the Connecticut Siting Council ("Council"). Additionally, in accordance with the Council's April 29, 2020 correspondence, one hard copy of Petitioners' response shall follow via federal express.

Please do not hesitate to contact me with any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Jesse A. Langer', is written over a light blue horizontal line.

Jesse A. Langer

Enclosure

Updike, Kelly & Spellacy, P.C.
8 Frontage Road ■ East Haven, CT 06512-2101 (t) 203.467.7337 (f) 203.468.7865 www.uks.com

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

PETITION OF CP EAST HAMPTON	:	PETITION NO. 1396
SOLAR I, LLC AND CP EAST	:	
HAMPTON SOLAR II FOR A	:	
DECLARATORY RULING THAT A	:	
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED	:	
IS NOT REQUIRED	:	April 30, 2020

**PETITIONERS’ RESPONSES TO THE SECOND SET OF
INTERROGATORIES BY THE CONNECTICUT SITING COUNCIL**

CP East Hampton Solar I, LLC (“CP Solar I”) and CP East Hampton Solar II, LLC (“CP Solar II” and sometimes collectively “Petitioners”) respectfully submit the following responses and non-privileged documentation to the Second Set of Interrogatories issued by the Connecticut Siting Council (“Council”) in connection with the above-captioned matter.

40. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the

photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features shown (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

On behalf of Petitioners, All-Points Technology Corporation, P.C. (“APT”) prepared a remote field review of the proposed solar photovoltaic electric generating facility (“Project”). The remote field review is appended hereto as Attachment A. On April 22, 2020, APT performed an additional in-field reconnaissance to confirm the most appropriate locations to depict site-specific and representative site features responsive to this interrogatory request. APT took photographs from the selected locations and depicted them on a photolog, which consists of an aerial view of the proposed Project with various layers of descriptive overlays. The photolog depicts Project specific features, which were located in the field via GPS coordinates and marked with cones for each photo location. APT also captured photographs flagging wetland areas.

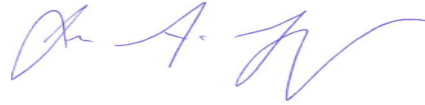
The individual photographs provide the viewer with orientation relative to the Project site and nearby features as well as detailed site-specific and representative features, including those listed in this interrogatory to the extent applicable. For the Council’s convenience, Petitioners have also appended hereto, as Schedule A, a photolog “glossary,” which matches the individual photographs to the specific features requested in this interrogatory. Additionally, Figures 2 and 3 of the Environmental Assessment also depict the existing conditions of the interior of the Project site, along with the surrounding features, where the modules would be situated.

The individual photographs, along with the Petition and previous interrogatory responses, reflect that the proposed Project would not have an adverse environmental impact, particularly with the stormwater control measures and other mitigation measures proposed by Petitioners. Petitioners addressed all of the site features listed in this interrogatory, to the extent applicable, in the Environmental Assessment and Stormwater Report. Additionally, the photographs were taken during leaf-off conditions, which confirm that the few residences within the vicinity of the Project would have limited seasonal views. Please see Petitioners’ response to Interrogatory 31. Furthermore, there would not be any views from the Air Line State Park Trail north of the Project site.

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Respectfully submitted by,

CP EAST HAMPTON SOLAR I, LLC and
CP EAST HAMPTON SOLAR II, LLC

A handwritten signature in blue ink, appearing to read "Jesse A. Langer". The signature is fluid and cursive, with a prominent initial "J" and "L".

By: _____

Jesse A. Langer
UPDIKE, KELLY & SPELLACY, P.C.
8 Frontage Road
East Haven, CT 06512
(203) 786-8317
Email: jlanger@uks.com

SCHEDULE A

(Photolog Glossary)

FEATURES LISTED IN INTERROGATORY NO. 40	RELEVANT PHOTOGRAPH NUMBER ¹	NOTES	RELEVANT SECTION IN PETITION
Wetlands, watercourses and vernal pools	1, 2, 2A, 3, 3A, 5, 6, 9A	No observed vernal pools	Attachment 1 (EA): Sections 2.3 and 3.3; Appendices D & F
Forest/forest edge areas	1, 3, 4, 6, 9A, 11, 12, 13	Existing woods edge and/or treeline clearing limits depicted	Attachment 1 (EA): Sections 2.4 and 3.4; Appendix D
Agricultural soil areas	Not applicable	There is no prime farmland	Attachment 1 (EA): Sections 2.6, 2.9, 2.10 and 3.10
Sloping terrain	All	All of the photographs show sloping terrain	Attachment 1: (EA) Appendix D
Proposed stormwater control features	1, 3, 5, 6, 10, 11, 13		Attachment 8 (Stormwater Report) and Attachment 1: (EA) Appendix D
Nearest residences	8, 12	The residence in photograph 12 is closer to the treeline clearing limit	Attachment 1: (EA) Section 3.15; Appendix D
Site access and interior access road(s)	3, 3A, 4, 5, 6, 7		Attachment 1: (EA) Section 2.2; Appendix D
Utility pads/electrical interconnection(s)	4		Attachment 1: (EA) Appendix D
Clearing limits/property lines	6, 7, 8, 9, 11, 12, 13		Attachment 1: (EA) Appendix D
Mitigation areas	Not applicable	Primarily related to construction	Attachment 1 (EA): Appendices D and F
Any other noteworthy features relative to the Project	7, 8	Photographs show no views from the Air Line State Park Trail	Attachment 1 (EA): Sections 2.11, 2.12, 3.11 and 3.12

¹ Each individual photograph is numbered at the lower left corner of the page.

ATTACHMENT A

(Remote Field Review)

REMOTE FIELD REVIEW

CONNECTICUT SITING COUNCIL
PETITION NO. 1396
PROPOSED SOLAR FACILITY
46 SKINNER STREET
EAST HAMPTON, CT

*Photographed April 22, 2020 by:
All-Points Technology Corporation, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385*



*Prepared on behalf of CP East Hampton Solar I, LLC
and CP East Hampton Solar II, LLC in Response to Interrogatory 40*



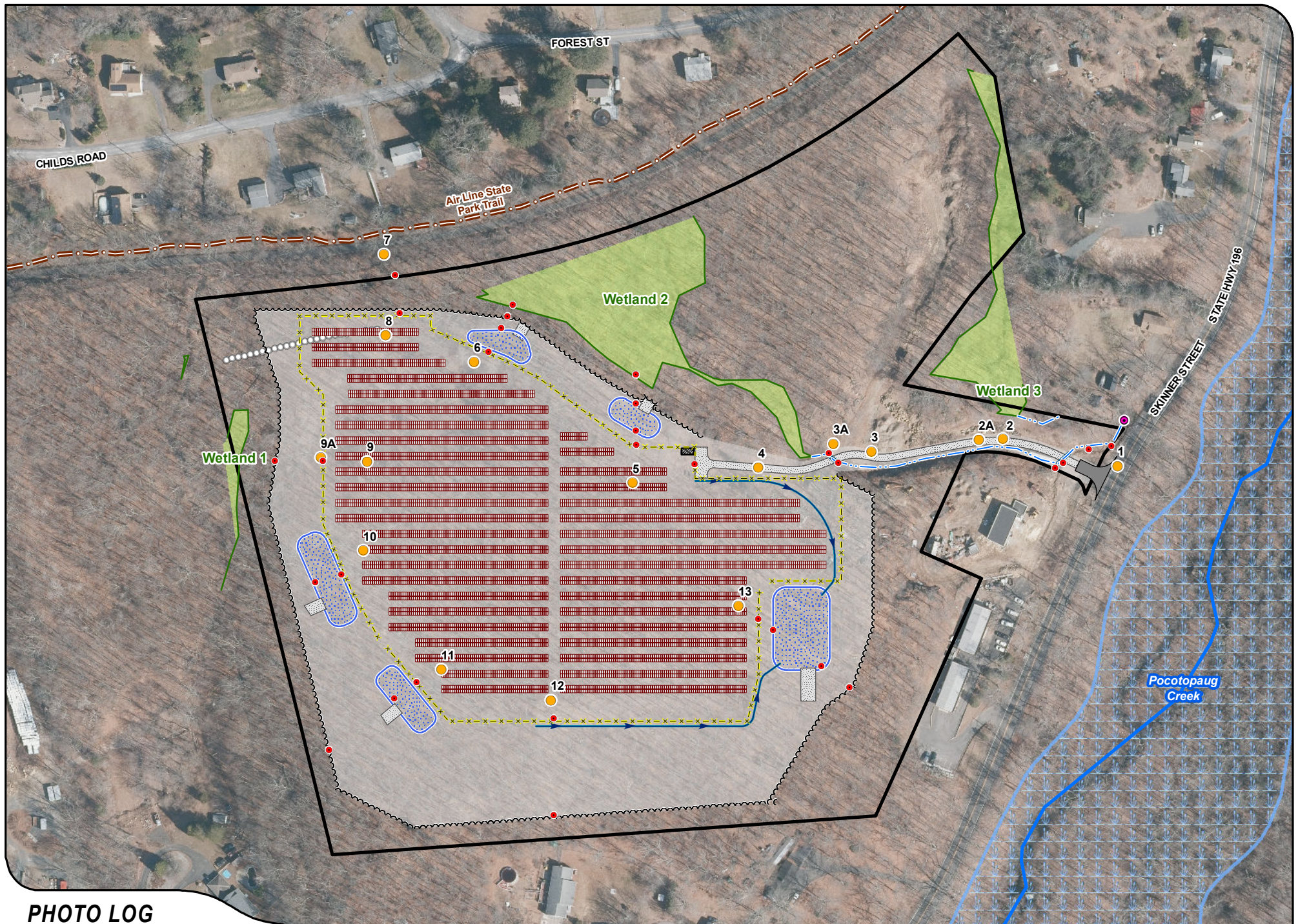
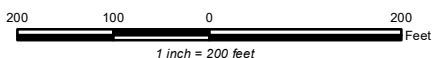


PHOTO LOG

- Photo Location
- Photo Field Markers
- Site
- Limit of Disturbance
- Solar Modules
- Pavement
- Concrete Pad
- Gravel
- Stormwater Basin
- Treeline Clearing Limit
- Perimeter Fence
- Stormwater Swale
- Stormwater 24" RCP
- Delineated Watercourse
- Delineated Wetland Boundary
- Delineated Wetland Area
- Hiking Trail
- Stonewall
- Watercourse (CTDEEP)
- Open Water (CTDEEP)
- Wetlands (CTDEEP)
- Culvert





PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

1

DESCRIPTION

LOOKING NORTHWEST FROM PROPOSED ACCESS ROAD TOWARDS THE PROPOSED FACILITY



DETAIL PHOTO OF INTERMITTENT WATER COURSE



PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

2

DESCRIPTION

LOOKING WEST FROM PROPOSED ACCESS ROAD TOWARDS PROPOSED FACILITY



PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

2A

DESCRIPTION

LOOKING EAST FROM THE ACCESS ROAD TOWARD SKINNER STREET



PHOTOGRAPHED ON 4/22/2020

EXISTING

PHOTO

3

DESCRIPTION

LOOKING WEST FROM PROPOSED ACCESS ROAD TOWARDS PROPOSED FACILITY



PHOTOGRAPHED ON 4/22/2020

EXISTING

PHOTO

3A

DESCRIPTION

LOOKING NORTHWEST FROM PROPOSED ACCESS ROAD TOWARDS WETLAND 2



TERRAIN SLOPING

EXISTING WOODS EDGE

APPROXIMATE LOCATION OF EQUIPMENT PAD

TERRAIN SLOPING

PROPOSED PERIMETER FENCE

EXISTING

PHOTO

DESCRIPTION

4

LOOKING WEST FROM PROPOSED ACCESS ROAD TOWARDS PROPOSED FACILITY

PHOTOGRAPHED ON 4/27/2020



PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

5

DESCRIPTION

LOOKING NORTH FROM PROPOSED FACILITY TOWARDS WETLAND 2



PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

6

DESCRIPTION

LOOKING NORTHEAST FROM PROPOSED FACILITY TOWARDS WETLAND 2



EXISTING

PHOTO

7

DESCRIPTION

LOOKING SOUTH FROM TOP OF BANK OF AIRLINE STATE PARK HIKING TRAIL TOWARDS PROPOSED FACILITY



PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

8

DESCRIPTION

LOOKING NORTH FROM PROPOSED FACILITY TOWARDS AIRLINE STATE PARK HIKING TRAIL



PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

9

DESCRIPTION

LOOKING WEST FROM PROPOSED FACILITY TOWARDS WETLAND 1



PHOTOGRAPHED ON 4/27/2020

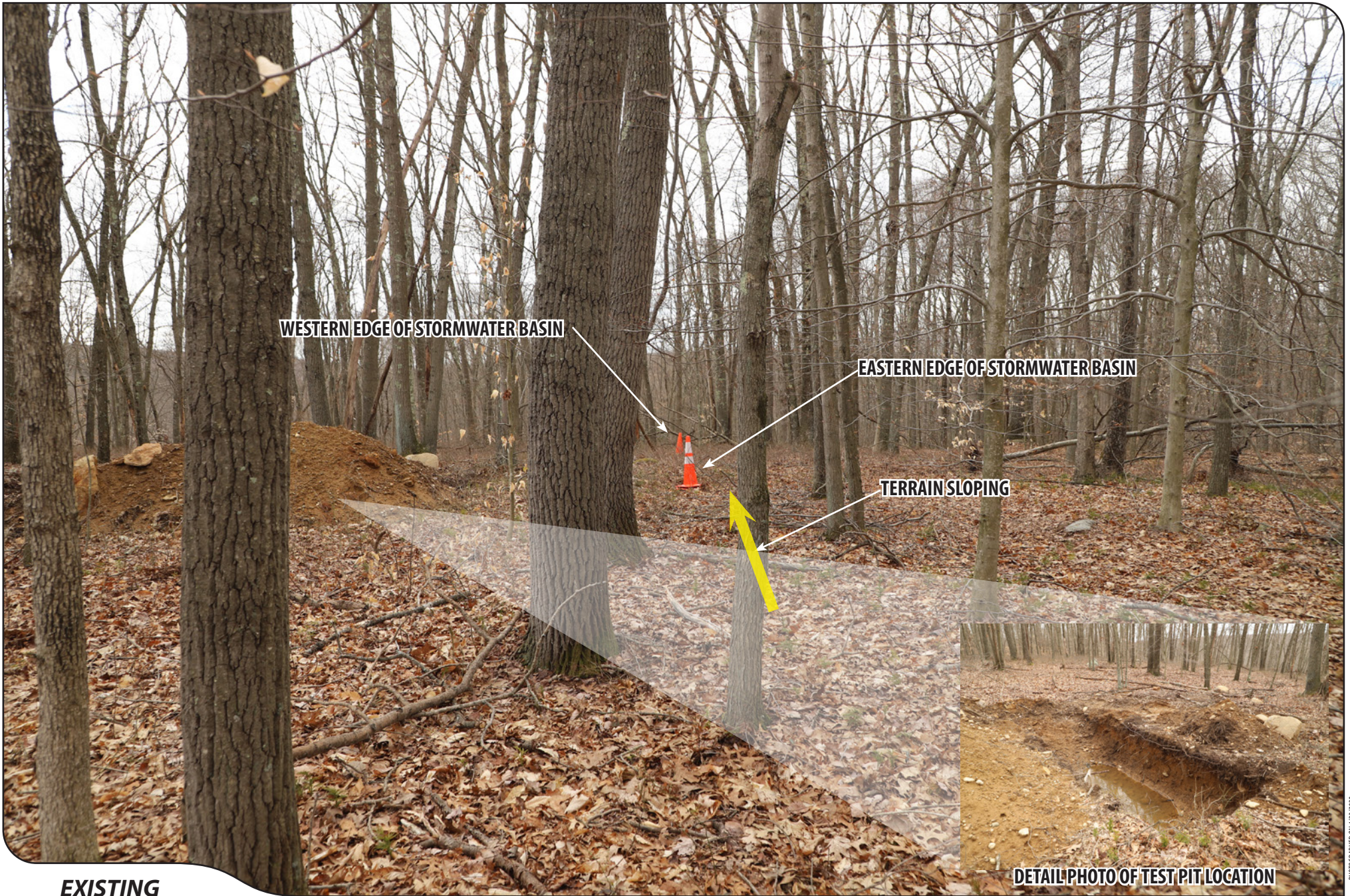
EXISTING

PHOTO

9A

DESCRIPTION

LOOKING WEST FROM PROPOSED FACILITY TOWARDS WETLAND 1



WESTERN EDGE OF STORMWATER BASIN

EASTERN EDGE OF STORMWATER BASIN

TERRAIN SLOPING

DETAIL PHOTO OF TEST PIT LOCATION

EXISTING

PHOTO

10

DESCRIPTION

LOOKING SOUTHWEST TOWARDS PROPOSED STORMWATER BASIN



PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

11

DESCRIPTION

LOOKING SOUTHWEST TOWARDS #76 MIDDLETOWN AVENUE



PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

12

DESCRIPTION

LOOKING SOUTH TOWARDS #68 SKINNER STREET



PHOTOGRAPHED ON 4/27/2020

EXISTING

PHOTO

13

DESCRIPTION

LOOKING SOUTH TOWARDS SKINNER STREET (MBL 20-48C-17)