

Petition No. 1424

Southington Solar One, LLC

Interrogatories and Requests For Production - Submitted by

Intervenors Michael and Diane Karabin

Aerial photos of the farmland site taken May 27, 2020 accompany this submission for referenc in connection with the below Interrogatories and Requests For Production. They pertain to Interrogatories referencing the Site, Prime Farmland Soils (Petition Table 3), Cropland and Hayfield (Petition Table 1), and Site Restoration.

1. Produce any and all documents which show and/or indicate you have the right to use, have access to, and/ or have control over any piece or portion of the “project site” exclusive of the “project area” which includes all site areas/acres not affected by the Project (as set forth in Petition p.21, Table1).
2. Are any areas of the Project Site under lease, use and/or control by another party, and if so, please explain.
3. Are there any plans or have there been discussions with the landowner of the site about a future expansion of the solar array beyond the project area (37.45 acres, see response to Interrogatory #15 and Petition P.21, Table 1), and if so, state what such plans or discussions are and the potential area(s) and size of expansion.
4. Petition pp .26-27 states the project will require excavation within areas mapped as Prime Farmland Soils, and that any topsoil removed in connection therewith will be segregated from underlying horizon and either stock piled for reuse or spread elsewhere as top soil for reestablishing vegetation and that the topsoil will not leave the site. Please state:
 - (a) The methods or manners in which the Prime Farmland Soils will be extracted and stockpiled?
 - (b) State where on the Site the Prime Farmland Soils will be stockpiled or spread elsewhere as top soil for reestablishing vegetation?
 - (c) State what vegetation would be reestablished and the method or manner of doing so.
 - (d) Have there been other solar projects in Connecticut where Prime Farmland Soils have been excavated and stockpiled or reused?
 - (e) As to Site restoration at the end of the project’s service life of 35 years (Petition p.12), Section 12.1 of Lease provided in response to CSC Interrogatory #13 states the

premises ... 'shall be restored to substantially the same condition as prior to commencement of the Lease.'

State the manner or method that will be used to restore the 26.6 acres (Petition p. 27, Table 3) of Prime Farmland Soils within the project limits and the time frame for such restoration.

- (f) Have there been other solar projects in Connecticut where Prime Farmland Soils have been restored?
 - (g) State the anticipated cost (and how it was arrived at) for the restoration of the 26.6 acres of Prime Farmland Soils, and produce any and all documents, models, studies etc., which have been used or relied on in connection with such future Prime Farmland Soils restoration and the cost.
 - (h) State whether the anticipated cost has or will be put in reserve, escrowed, or bonded, and produce any and all documentation in connection with any such reserve, escrow, or bond.
5. CSC's Interrogatory #17 asked what is the size of the pollination area? You Answered:

"A Wildflower Pollinator Area was originally proposed by the Petitioner in the southwestern portion of the Project Area. This area has now been relocated after meeting with the tenant farmer on the property in June. The reasoning for relocation was to allow for continued and future agricultural use of this location. The relocated Wildflower Pollinator Area is in the south-central portion of the fenced in array area. This habitat area will be over 1 acre in size and sown with a dedicated Wildflower Pollinator seed mix. The habitat area is delineated as the trapezoidal area depicted in Figure 1 below."

What was the size in terms of acreage of the Wildflower Pollinator Area that was originally proposed?

6. Petition P.27, Table 3 (Farmland Soils Assessment and Impacts Table) which details the amount of farmland soils located on the site and the proposed impact from the project indicates 48.7 acres of Prime Farmland Soil on the site, and 26.6 acres within the Project Limits. CSC's Interrogatory #43, and your response are:

INTERROGATORY #43:

Petition p. 27, does Table 3 only refer to Prime farmland Soils: Are Farmland Soils of Statewide Importance present in areas on the site that are currently used for agriculture: If so, indicate acreage currently

in use and acreage that would be available for post-construction use if not encumbered by storm water basins or habitat enhancement areas.

ANSWER:

Regarding the councils' first inquiry – yes, Table 3 (Petition, p. 27) only refers to Prime Farmland Soils.

Farmland Soils of Statewide Importance are present in the areas that are currently being used for agriculture, totaling approximately 20.9 acres. Upon completion of Project construction, approximately 12.6 acres of Farmland Soils of Statewide Importance will remain unencumbered on site.

Explain the difference between the Prime Farmland Soils acreage set forth in Table 3 and your response to Interrogatories #43, as Table 3 indicates 22.1 acres of Prime Farmland Soils would remain unencumbered on the Site (Table 3, 48.7 total acres on site - 26.6 acres within project limits = 22.1 acres), and your response to Interrogatory #43 that 12.6 acres of Farmland Soils of Statewide Importance will remain unencumbered on the site.

7. Petition pp. 21-22 states sheep may be allowed to graze at the site and Petition p. 27 talks of the co-location of agricultural grazing at the Project Site.

What is the source of water for the sheep and where is that source located?

8. Petition p. 21, Table 1, Habitat Assessment and Impacts Table indicates that the cropland and hayfield comprise 60 acres of the Site, and 35.71 acres of cropland and hayfield will be affected by the project.
 - (a) As to site restoration (see Section 12.1 of Lease provided) at the end of the project's service life (35 years, Petition p. 12), state the manner or method that will be used to restore the 35.71 acres of farm cropland and hayfield on the site.
 - (b) Have there been other solar projects in Connecticut in which farm croplands and hayfields have been restored.
 - (c) State the anticipated cost (and how that was arrived at) that has been budgeted and/or put in reserve and/or bonded for farm cropland and hayfield restoration, and produce any and all documents, studies, models

in which have been used or relied upon in connection with such future farmland restoration and its cost.

- (d) State whether the anticipated cost has been put in reserve, escrowed, or bonded, and produce any and all documents in connection with any such reserve, escrow, or bond.