

East Windsor Solar One LLC

Petition No. 1426

Development and Management Plan

1.0 Introduction

East Windsor Solar One LLC is submitting this Development and Management Plan for its solar project in East Windsor, Connecticut. The Siting Council approved the project by Decision and Order on May 6, 2021 in Petition 1426 (“Petition”). This Development and Management Plan shall provide the Council with greater detail regarding the project and its operations.

2.0 Need for and Elements of the D&M Plan

In its May 6, 2021 Decision and Order in this Petition, the Siting Council required that East Windsor Solar One provide the Council with a Development and Management (D&M) Plan for the facility East Windsor Solar One proposes to construct. The D&M Plan is designed to give the Council a better understanding of the final construction plans for the proposed project, including final layout, and information regarding various submittals and correspondence with the Connecticut Department of Energy and Environmental Protection (DEEP) related to the Project. Specifically, the May 6, 2021 Decision and Order requires the following elements for the D&M Plan:

- a) A final site plan including, but not limited to, final facility layout, access roads, electrical interconnection including riser pole locations, fence design, equipment pads, stormwater management control structures, and final seed mix;
- b) Final plans for hosting sheep grazing at the site including, but not limited to, provisions for emergency evacuation;
- c) Consultation with DEEP Stormwater Division regarding the potential impacts of sheep grazing on the site and any recommendations from DEEP, as applicable;
- d) Erosion and sedimentation control plan consistent with the 2002 Connecticut Guidelines for Erosion and Sedimentation Control including, but not limited to, temporary sediment basin details, site stabilization/seedling/growing season details prior to the installation of post driving/racking system, site stabilization measures during construction, inspection and reporting protocols, methods for periodic clearing of temporary sediment traps and swales during construction, and final cleaning of stormwater basins upon site stabilization;
- e) Site construction detail/phasing plan including, but not limited to, construction laydown area, site clearing/grubbing, site grading, excess earth material disposal locations, site stabilization/seedling/growing season details, soil stockpile locations, and a fuel storage/spill

plan that is protective of groundwater resources;

f) Solar module specifications that indicate the selected solar module will not contain PFAS and will not be characterized as hazardous waste through applicable TCLP testing at the time of this decision;

g) Final structural design for solar module racking system stamped by a Professional Engineer duly licensed in the State of Connecticut;

h) Construction traffic control plan developed in consultation with the Town;

i) Construction hours shall occur Monday through Saturday with any Sunday work to be requested, as necessary;

j) Consultation with DEEP Dam Safety Division regarding permitting requirements, if any, for the proposed stormwater basin prior to site construction; and

k) Post-construction Operations and Maintenance Plan that includes inspections of facility components, vegetation and stormwater basin/controls, corrective/remediation measures, and vegetation/site management procedures.

Each of these elements of the D&M Plan is addressed in turn.

3.0 Elements of the D&M Plan

(a) Final Site Plans

The Final Site Plans, including final facility layout, access roads, electrical interconnection including riser pole locations, fence design, equipment plan, stormwater management control structures, and final seed mix are included here in Exhibit A. As the Council can see from the attached drawings, a number of improvements were made to the design after the public hearing.

Specifically, the following changes were made to the proposed project:

1. East Windsor Solar One added privacy slats to the entire Western Fence Line. (Reference SP-1 & SP-2 in Exhibit A)
2. East Windsor Solar One added 100 feet of double row and 100 feet of single row Arborvitae to the landscaping plan along the western Fence Line as an extension of the landscaping along the northern fence line. This extends the landscaping an additional 200 feet south outside of the western fence line of the facility. Thirty-three (33) additional plantings will be added in this area. (Reference SP-1 & SP-2, Single Row Planting Detail on DN-1 in Exhibit A)

3. East Windsor Solar One worked with Eversource to improve the electrical interconnection design by eliminating the need for one (1) utility pole. The recloser and recloser pole were removed from the utility design and replaced with a set of in-line switches that still provides Eversource with its desired level of protection and controls. The total utility pole count was reduced from six (6) to five (5) as a result.
4. The revised final site plans attached hereto as Exhibit A are designed to comply with the new requirements of DEEP's Stormwater General permit for Construction Activities.
5. The proposed seeding mix for the project is noted on DN-1 of the attached Exhibit A. The seed mix is noted as Ernst Fuzz & Buzz.

(b) Sheep Grazing Plans

Sheep Grazing plans completed for the East Windsor Solar One project can be found attached to this submission in Exhibit B. The Sheep Grazing and Integration Plan were developed specifically for the East Windsor Solar One project site and collectively will address the following components of the Sheep Grazing Plan:

1. Sheep Stocking Rates
2. Defined Sheep Grazing Areas (by paddock)
3. Emergency Protocols
4. Manure Management
5. Water Quality
6. Livestock Management Schedule

(c) Consultation with DEEP Stormwater Division regarding sheep grazing

East Windsor Solar One consulted with the CT DEEP Stormwater division regarding the planned sheep grazing program at the East Windsor Solar One project site. As a result of this consultation, the following guidance was provided to the Project.

1. The CT DEEP Stormwater Division recommends that any surface waters should have a fenced vegetative buffer.
 - a. The East Windsor Solar One Grazing plan adheres to this guidance.
2. The CT DEEP Stormwater Division recommends a Grazing Management Plan if sheep are to be kept at the site on a seasonal basis.
 - a. The Sheep Grazing Management Plan is attached to this filing as Exhibit
 - b. Sheep will only be present at the site on a seasonal basis.
3. The CT DEEP Stormwater Division also noted that sheep stocking rates may vary due to the amount of land to be grazed and the quality of forages on the land.

- a. The East Windsor Solar One Grazing Management Plan offers specific guidance to the grazing manager as to the optimal stock rate based on the grazing acreage, forage present, and feed intake by sheep.
4. The CT DEEP Stormwater Division also recommended the exclusion of any sheep from all stormwater basins.
 - a. The East Windsor Solar One Grazing plan adheres to this guidance.

(d) Erosion and sedimentation control plan

East Windsor Solar One has developed the Erosion and sedimentation control plan consistent with the 2002 Connecticut Guidelines for Erosion and Sedimentation Control. This plan can be found on Sheet EC-1 of the attached Exhibit A (final site plans).

(e) Site construction detail, phasing plan and fuel storage/spill prevention plan

East Windsor Solar One has developed the site construction detail and phasing plan. This plan can be found on Sheet EC-1 of the attached Exhibit A (final site plans). The Fuel Storage & Spill Prevention Plan can be found attached hereto as Exhibit G.

(f) Solar module specifications: TCLP Testing & PFAS Statement

East Windsor Solar One recently obtained the respective manufacturers' TCLP test results for the Solar Modules intended for this project. Attached hereto as Exhibit C are the reports for both the Trina and Risen modules. The reports indicate that the modules to be installed for the East Windsor Solar One project, would not be characterized as hazardous waste if disposed under current regulations. Additionally, attached hereto as Exhibit C are the statements from both Trina and Risen that the modules acquired for the East Windsor Solar One project do not contain PFAS materials.

(g) Final structural design for solar module racking system stamped by a Professional Engineer

The Final Racking Structural Drawings for the Solar module Racking system can be found attached hereto as Exhibit D.

(h) Construction Traffic Control Plan developed in consultation with the Town;

East Windsor Solar One has developed a Traffic Control Plan in support of the East Windsor Solar One project and has provided that plan to the Town of East Windsor for any commentary. The Construction Traffic Control Plan is attached hereto as Exhibit E.

(i) Construction hours shall occur Monday through Saturday with any Sunday work to be requested, as necessary:

As delineated in the Construction Traffic Control Plan, anticipated construction hours for the project are Monday through Saturday from 7:00 a.m. to 4:00 p.m. Should hours be required on Sunday, a request will be made to the Council, and those hours will be from 9:00 a.m. to 4:00 p.m.

(j) Consultation with DEEP Dam Safety Division regarding permitting requirements, if any, for the proposed stormwater basin prior to site construction

East Windsor Solar One consulted with the CT DEEP Dam Safety Division regarding any permitting requirements for the stormwater basin. East Windsor Solar One's understanding is that "Any dam which impounds less than three acre-feet of water (when assuming the water level at the crest of the dam) will not require a Dam Safety Construction Permit."

For the East Windsor Solar One project at the crest of the proposed basin, elevation 193.5, the storage is at that elevation is 2.27 acre-feet. Thus, it is our understanding that the project would not require a Dam Safety Permit.

The DEEP Dam Safety Division agreed with the statement noted above and that no further review was needed. An email correspondence from the DEEP Dam Safety Division documenting this concurrence is attached hereto in Exhibit F for reference.

(k) Post-construction Operations and Maintenance Plan that includes inspections of facility components, vegetation and stormwater basin/controls, corrective/remediation measures, and vegetation/site management procedures.

East Windsor Solar One has developed the following Post-Construction Operations and Maintenance Plan that includes inspections of the facility components, vegetation and stormwater basin / controls, corrective / remediation measures, and vegetation / site management procedures.

Energy Production Monitoring

East Windsor Solar One, LLC will utilize a continuous 24/7 remote monitoring system to provide alarm and performance data of the system. The monitoring system will include full site and inverter level production and alarms as well as site weather and irradiance data. East Windsor Solar One, LLC will analyze performance data to make sure that the system is performing as designed and will be responsible for dispatching crews for system maintenance and repair related issues.

Inspections

East Windsor Solar One, LLC will conduct inspections of the Solar Farm in accordance with the following schedule depicted on the next page:

Table 1. Onsite Inspections Schedule

Task	Frequency
On-Site Ground Inspection	Monthly
Visual Array & Equipment Inspection	1x per year or per equipment manufacturer requirements
Mechanical and Electrical Inspections	1x per year or per equipment manufacturer requirements
Panel Cleaning	As Needed
Mowing and Trimming	In accordance with Livestock Grazing Plan. Mowing and trimming as needed.
Snow Removal	As needed
Perimeter Fence Inspection	1x per year
Stormwater Management System Inspection	1x per year or per engineer's stormwater management plan

Maintenance and Repairs

East Windsor Solar One, LLC will handle all repairs identified during site inspections and through remote monitoring in a timely and efficient manner.

Long-term Stormwater Maintenance Plan

East Windsor Solar One, LLC will provide maintenance in accordance with the approved stormwater maintenance plan produce by the engineer of record and as required by applicable DEEP regulations.

Vegetation Management Plan

The primary means of vegetation management will come in the form of the Livestock Grazing Program to be deployed by East Windsor Solar One, LLC in partnership with Agrivoltaic Solutions LLC. In Summary, the sheep grazing program will be used to control vegetation at the project site in order to achieve the following:

- Prevent panel shading from vegetation,
- Control and remove invasive and unpalatable plant species,
- Avoid the growth of brush and woody species under the solar panels,
- Maintain a diverse forage population to support optimal sheep nutrition,
- Encourage flowering forb and plant species to maximize pollinator habitat,
- Optimize sequestered soil carbon through increasing top-soil amount and root matter,
- Control erosion.

The complete East Windsor Solar One Grazing Program is attached as Exhibit B hereto.