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Also admitted in Massachusetts
and Vermont

Via Electronic Mail (siting.council@ct.gov)

May 14, 2021

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

Re: **PETITION NO. 1442 - SR Litchfield, 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 19.8-megawatt AC solar photovoltaic electric generating facility on 6 contiguous parcels located both east and west of Wilson Road south of the intersection with Litchfield Town Farm Road in Litchfield, Connecticut, and both east and west of Rossi Road, south of the intersection with Highland Avenue in Torrington, Connecticut, and associated electrical interconnection**

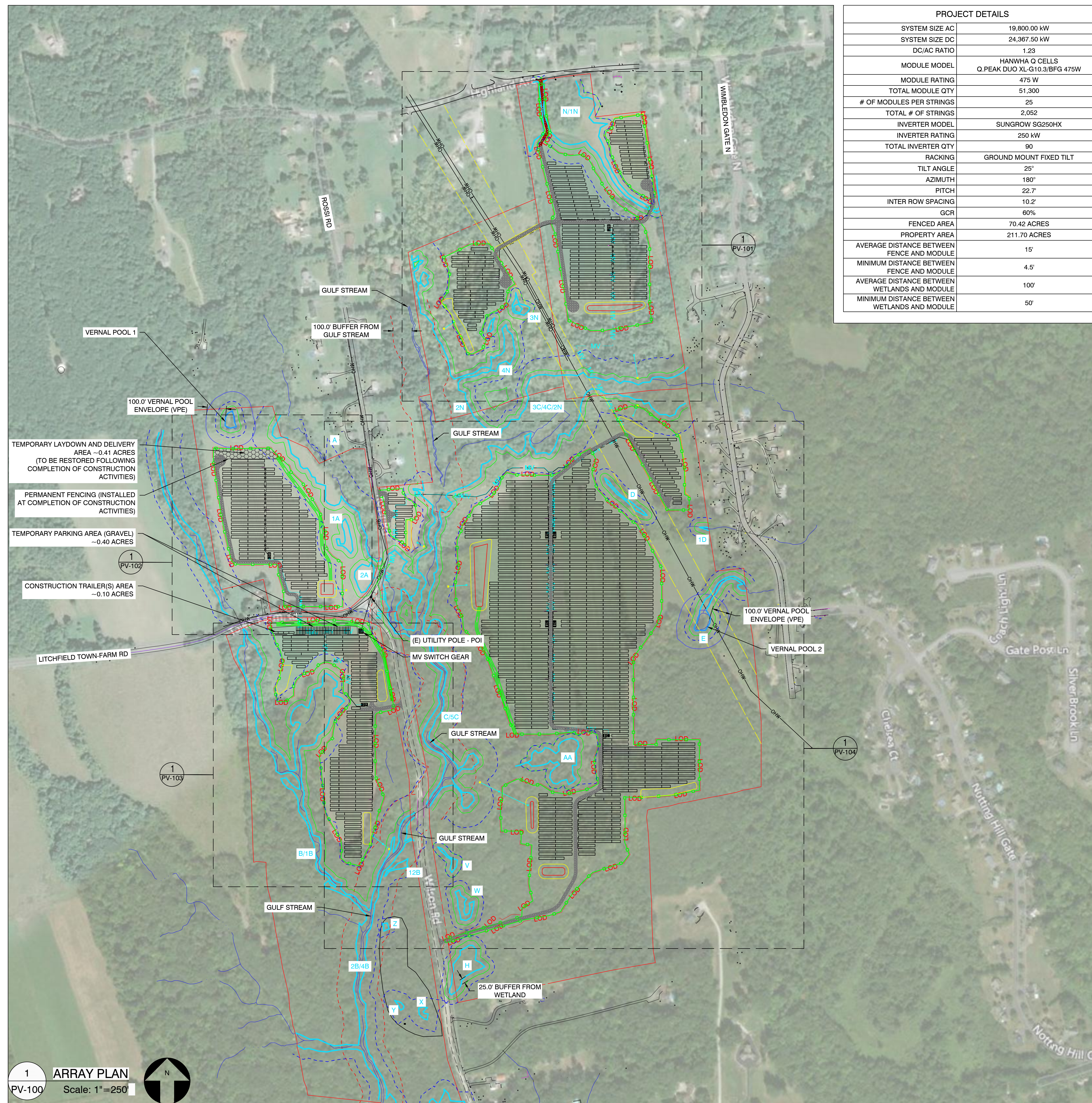
Dear Attorney Bachman:

SR Litchfield, LLC hereby submits a revised Preliminary Site Layout Plan (Petition Exhibit A (rev. 05.03.21)) and a map illustrating the modifications made to the original Project design (Exhibit 1: Overall Site Plan) in connection with the above-referenced Petition.

These updated documents are the result of SR Litchfield's extensive and substantial redesign of the Project. This redesign was undertaken to address certain comments, concerns and suggestions raised by the Siting Council (Council), neighbors, the Town of Litchfield (Town), the Council on Environmental Quality (CEQ), the Department of Energy and Environmental Protection (DEEP), and the Department of Agriculture.

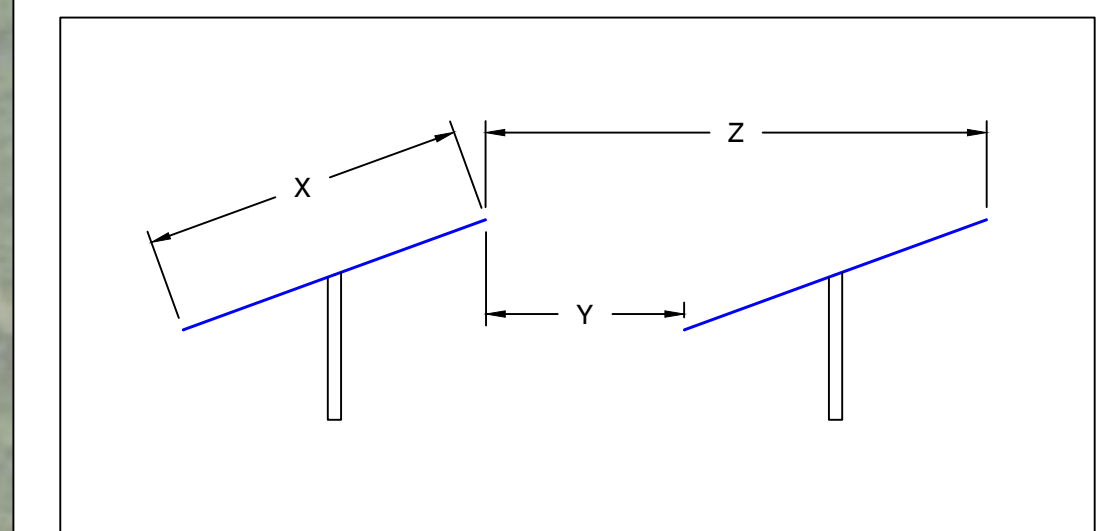
To assist the Council in its review of the attached Project plan revisions, SR Litchfield also provides the following narrative summarizing many of the changes made during the Project redesign. Where appropriate, references are made to Exhibit 1: Overall Site Plan.

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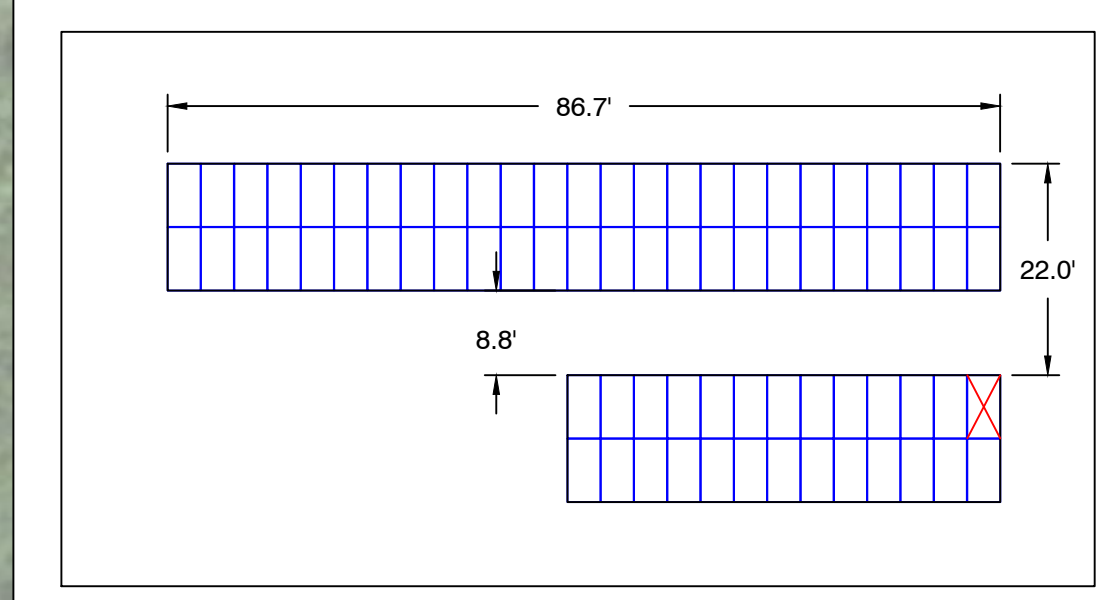
PROJECT DETAILS	
SYSTEM SIZE AC	19,800.00 kW
SYSTEM SIZE DC	24,367.50 kW
DC/AC RATIO	1.23
MODULE MODEL	HANWHA Q CELLS Q.PEAK DUO XL-G10.3/BFG 475W
MODULE RATING	475 W
TOTAL MODULE QTY	51,300
# OF MODULES PER STRINGS	25
TOTAL # OF STRINGS	2,052
INVERTER MODEL	SUNGROW SG250HX
INVERTER RATING	250 kW
TOTAL INVERTER QTY	90
RACKING	GROUND MOUNT FIXED TILT
TILT ANGLE	25°
AZIMUTH	180°
PITCH	22.7°
INTER ROW SPACING	10.2'
GCR	60%
FENCED AREA	70.42 ACRES
PROPERTY AREA	211.70 ACRES
AVERAGE DISTANCE BETWEEN FENCE AND MODULE	15'
MINIMUM DISTANCE BETWEEN FENCE AND MODULE	4.5'
AVERAGE DISTANCE BETWEEN WETLANDS AND MODULE	100'
MINIMUM DISTANCE BETWEEN WETLANDS AND MODULE	50'

LEGEND	
	2P X 25 HANWHA Q-CELLS 475W @25° TILT
	2P X 13 HANWHA Q-CELLS 475W @25° TILT
	EQUIPMENT RACK (TYP. OF 8) (1) LV SWITCHGEAR & (1) MV TRANSFORMER
	SUNGROW 250kW STRING INVERTER
	EQUIPMENT RACK WITH 1 STRING INVERTER
	EQUIPMENT RACK WITH 3 STRING INVERTERS
	EQUIPMENT RACK WITH 4 STRING INVERTERS
	WETLANDS
	UNDERGROUND AC CABLE
	UNDERGROUND MEDIUM VOLTAGE CABLE
	OVERHEAD ELECTRICAL LINES
	PERMANENT FENCE LINE
	TEMPORARY FENCE LINE
	LIMIT OF DISTURBANCE
	STORMWATER BASIN
	16FT ACCESS ROADS
	12FT ACCESS ROADS
	TEMPORARY LAYDOWN AREA (TO BE RESTORED FOLLOWING COMPLETION OF CONSTRUCTION ACTIVITIES)
	25' WETLAND BUFFER
	WETLAND SETBACK
	100' GULF STREAM BUFFER
	WETLAND ID
	LANDSCAPING



GCR TABLE			
	FEET	METER	
X	14.58	4.44	MODULE WIDTH
Y	8.81	2.69	aisle WIDTH
Z	22.03	6.72	PITCH
GCR PER PVSYST	66%		X/Z
ACTUAL GCR	60.0%		(Z-Y)/Z

3 GCR DETAILS
Scale: NTS



2 TYP. MODULE RACKS
Scale: 1"=20'

SOLVIDA
DESIGN + ENGINEERING
1641 Kains Avenue, Berkeley, California 94702

SILICON RANCH

MILLER BROS.

LITCHFIELD SOLAR
2-298 ROSSI RD
TORRINGTON, CT 06790, USA.
LAT: 41.794157°N
LON: 73.168028°W

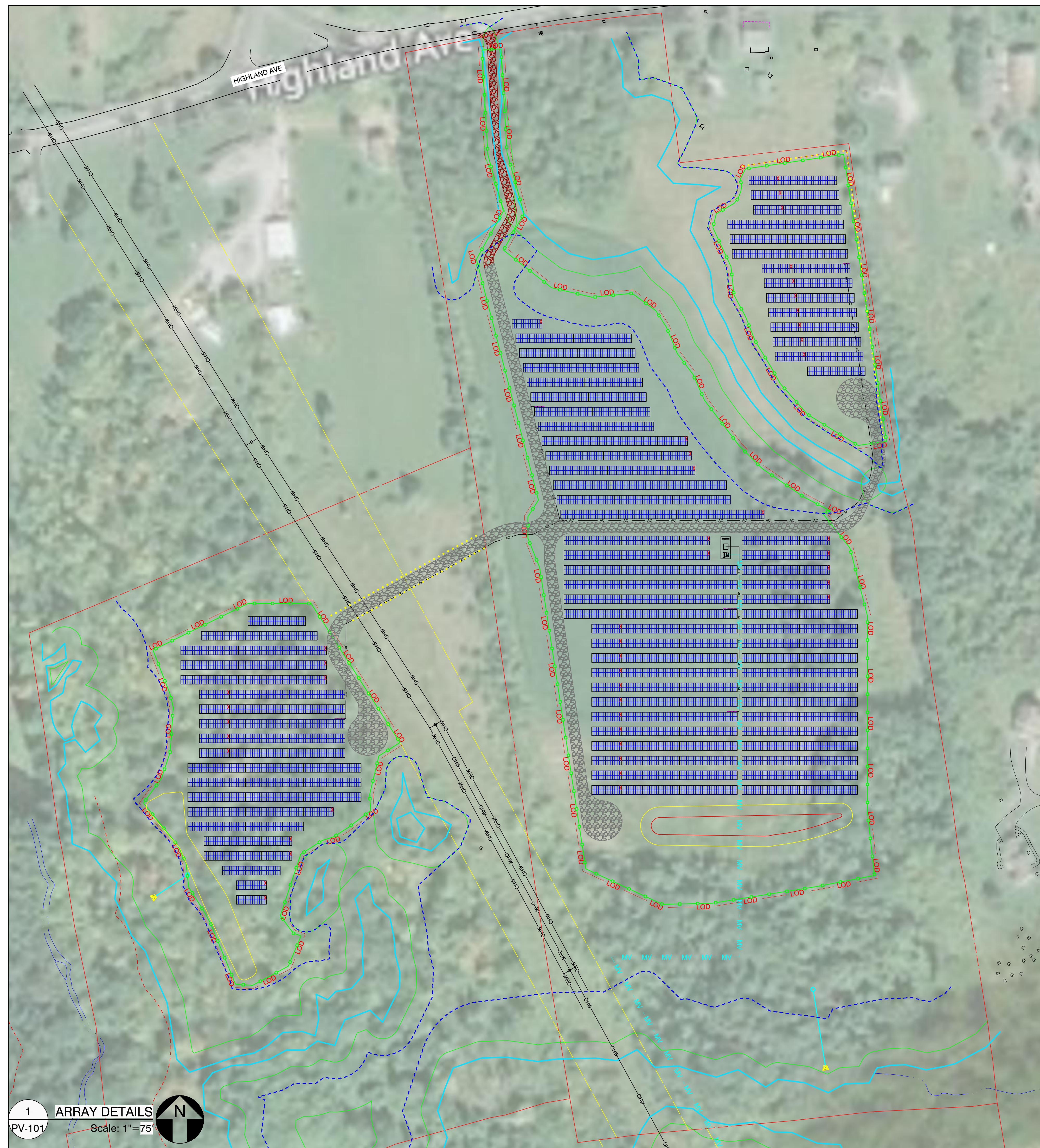
REV. NO	DESCRIPTION	DATE
0	PRELIMINARY	05/03/21

SHEET TITLE:
PRELIMINARY LAYOUT

PROJ. MGR.	PROJ. ENGR. SDE	DATE: 05/03/21
DRAWN BY: LR	CHECKED BY:	SCALE: AS SHOWN
DRAWING NO.		

PV-100

1 ARRAY PLAN
Scale: 1"=250'



LEGEND	
	2P X 25 HANWHA Q-CELLS 475W @25° TILT
	2P X 13 HANWHA Q-CELLS 475W @25° TILT
	EQUIPMENT RACK (1) LV SWITCHGEAR & (1) MV TRANSFORMER
	SUNGROW 250kW STRING INVERTER (TYP. OF 90)
	EQUIPMENT RACK WITH 1 STRING INVERTER (TYP. OF 3 LOCATIONS)
	EQUIPMENT RACK WITH 3 STRING INVERTERS (TYP. OF 17 LOCATIONS)
	EQUIPMENT RACK WITH 4 STRING INVERTERS (TYP. OF 9 LOCATIONS)
	WETLANDS
	UNDERGROUND AC CABLE
	UNDERGROUND MEDIUM VOLTAGE CABLE
	OVERHEAD ELECTRICAL LINES
	PERMANENT FENCE LINE
	LIMIT OF DISTURBANCE
	STORMWATER BASIN
	16FT ACCESS ROADS
	12FT ACCESS ROADS
	TEMPORARY LAYDOWN AREA (TO BE RESTORED FOLLOWING COMPLETION OF CONSTRUCTION ACTIVITIES)
	25' WETLAND BUFFER
	WETLAND SETBACK
	100' GULF STREAM BUFFER
	LANDSCAPING

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LITCHFIELD SOLAR

2-298 ROSSI RD
TORRINGTON, CT 06790, USA.
LAT: 41.794157°N
LON: 73.168028°W

REV. NO	DESCRIPTION	DATE
0	PRELIMINARY	05/03/21

SHEET TITLE:
ARRAY DETAILS

PROJ. MGR.	PROJ. ENGR. SDE	DATE:
		05/03/21
DRAWN BY: LR	CHECKED BY:	SCALE: AS SHOWN
DRAWING NO.		

PV-101



LEGEND	
	2P X 25 HANWHA Q-CELLS 475W @25° TILT
	2P X 13 HANWHA Q-CELLS 475W @25° TILT
	EQUIPMENT RACK (1) LV SWITCHGEAR & (1) MV TRANSFORMER
	SUNGROW 250kW STRING INVERTER (TYP. OF 90)
	EQUIPMENT RACK WITH 1 STRING INVERTER (TYP. OF 3 LOCATIONS)
	EQUIPMENT RACK WITH 3 STRING INVERTERS (TYP. OF 17 LOCATIONS)
	EQUIPMENT RACK WITH 4 STRING INVERTERS (TYP. OF 9 LOCATIONS)
	WETLANDS
	UNDERGROUND AC CABLE
	UNDERGROUND MEDIUM VOLTAGE CABLE
	OVERHEAD ELECTRICAL LINES
	PERMANENT FENCE LINE
	LIMIT OF DISTURBANCE
	STORMWATER BASIN
	16FT ACCESS ROADS
	12FT ACCESS ROADS
	TEMPORARY LAYDOWN AREA (TO BE RESTORED FOLLOWING COMPLETION OF CONSTRUCTION ACTIVITIES)
	25' WETLAND BUFFER
	WETLAND SETBACK
	100' GULF STREAM BUFFER
	LANDSCAPING

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LITCHFIELD SOLAR

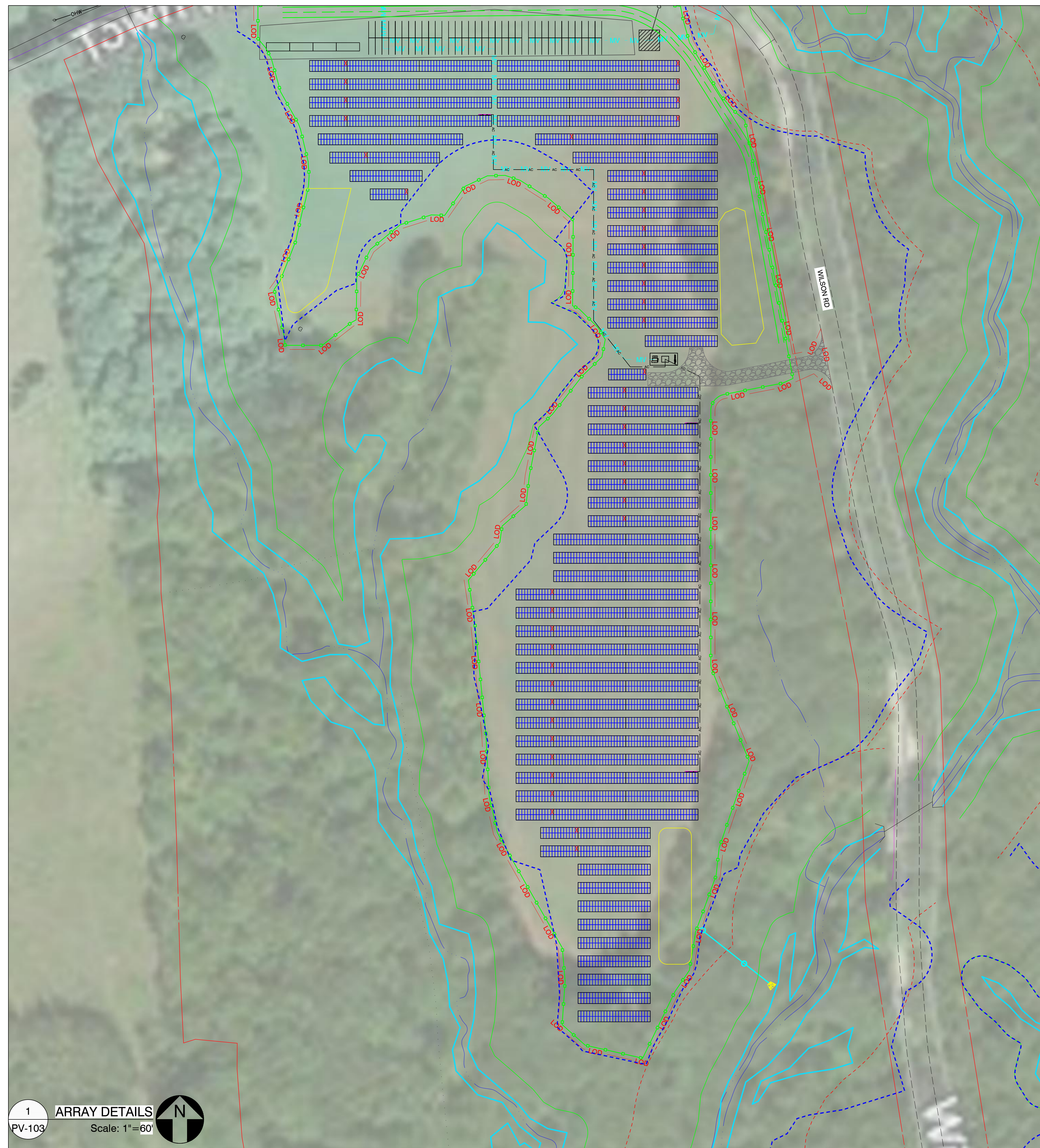
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TORRINGTON, CT 06790, USA.
LAT: 41.794157°N
LON: 73.168028°W

REV. NO	DESCRIPTION	DATE
0	PRELIMINARY	05/03/21

SHEET TITLE:
ARRAY DETAILS

PROJ. MGR.	PROJ. ENGR. SDE	DATE: 05/03/21
DRAWN BY: LR	CHECKED BY:	SCALE: AS SHOWN
DRAWING NO.		

PV-102



LEGEND	
	2P X 25 HANWHA Q-CELLS 475W @25° TILT
	2P X 13 HANWHA Q-CELLS 475W @25° TILT
	EQUIPMENT RACK (1) LV SWITCHGEAR & (1) MV TRANSFORMER
	SUNGROW 250kW STRING INVERTER (TYP. OF 90)
	EQUIPMENT RACK WITH 1 STRING INVERTER (TYP. OF 3 LOCATIONS)
	EQUIPMENT RACK WITH 3 STRING INVERTERS (TYP. OF 17 LOCATIONS)
	EQUIPMENT RACK WITH 4 STRING INVERTERS (TYP. OF 9 LOCATIONS)
	WETLANDS
	UNDERGROUND AC CABLE
	UNDERGROUND MEDIUM VOLTAGE CABLE
	OVERHEAD ELECTRICAL LINES
	PERMANENT FENCE LINE
	LIMIT OF DISTURBANCE
	STORMWATER BASIN
	16FT ACCESS ROADS
	12FT ACCESS ROADS
	TEMPORARY LAYDOWN AREA (TO BE RESTORED FOLLOWING COMPLETION OF CONSTRUCTION ACTIVITIES)
	25' WETLAND BUFFER
	WETLAND SETBACK
	100' GULF STREAM BUFFER
	LANDSCAPING

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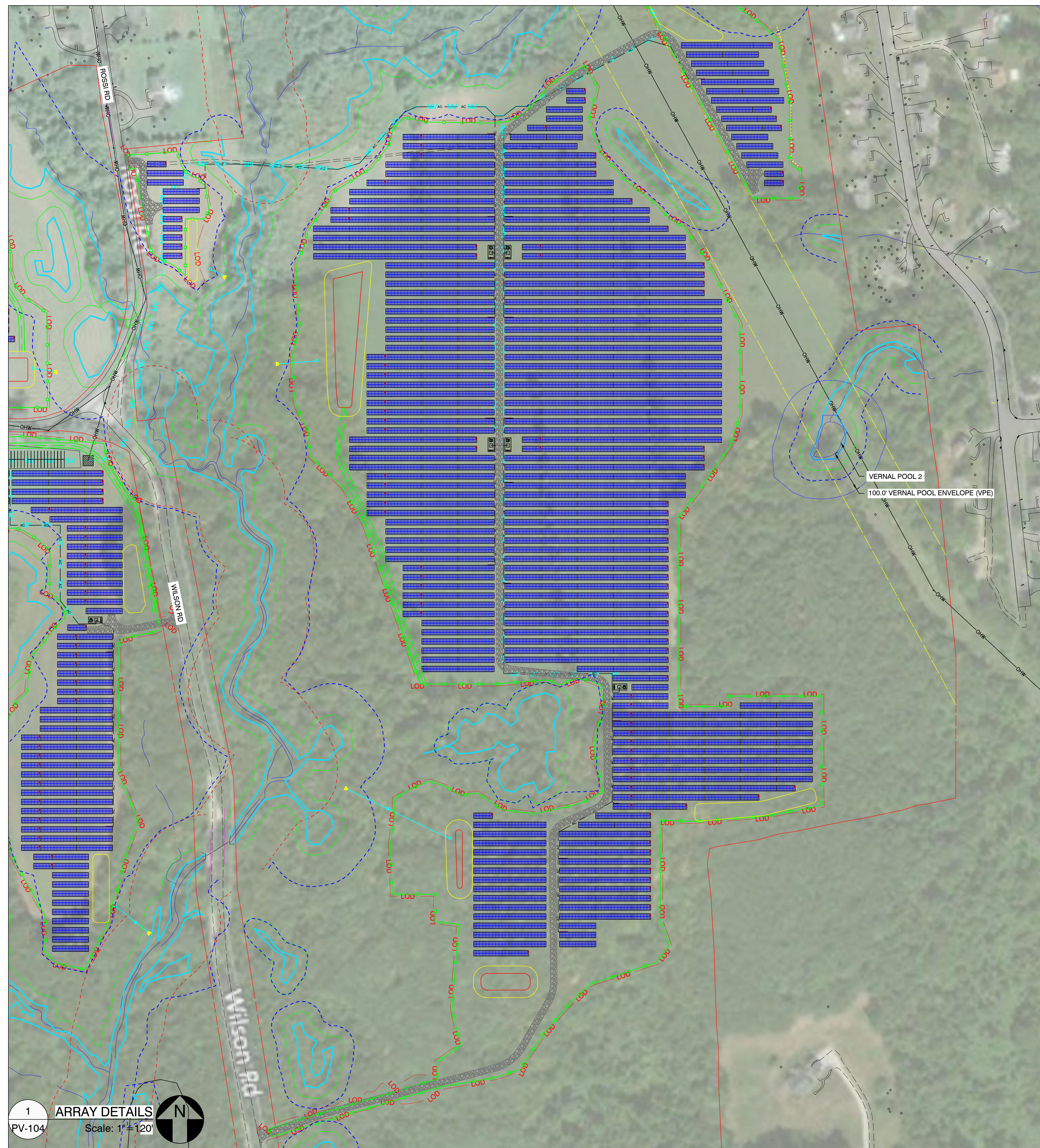
2-298 ROSSI RD
TORRINGTON, CT 06790, USA.
LAT: 41.794157°N
LON: 73.168028°W

REV. NO	DESCRIPTION	DATE
0	PRELIMINARY	05/03/21

SHEET TITLE:
ARRAY DETAILS

PROJ. MGR.	PROJ. ENGR. SDE	DATE: 05/03/21
DRAWN BY: LR	CHECKED BY:	SCALE: AS SHOWN

DRAWING NO.
PV-103



LEGEND	
	2P X 25 HANWHA Q-CELLS 475W @25° TILT
	2P X 13 HANWHA Q-CELLS 475W @25° TILT
	EQUIPMENT RACK (1) LV SWITCHGEAR & (1) MV TRANSFORMER
	SUNGROW 250kW STRING INVERTER (TYP. OF 90)
	EQUIPMENT RACK WITH 1 STRING INVERTER (TYP. OF 3 LOCATIONS)
	EQUIPMENT RACK WITH 3 STRING INVERTERS (TYP. OF 17 LOCATIONS)
	EQUIPMENT RACK WITH 4 STRING INVERTERS (TYP. OF 9 LOCATIONS)
	WETLANDS
	UNDERGROUND AC CABLE
	UNDERGROUND MEDIUM VOLTAGE CABLE
	OVERHEAD ELECTRICAL LINES
	PERMANENT FENCE LINE
	LIMIT OF DISTURBANCE
	STORMWATER BASIN
	16FT ACCESS ROADS
	12FT ACCESS ROADS
	TEMPORARY LAYDOWN AREA (TO BE RESTORED FOLLOWING COMPLETION OF CONSTRUCTION ACTIVITIES)
	25' WETLAND BUFFER
	WETLAND SETBACK
	100' GULF STREAM BUFFER
	LANDSCAPING

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DESIGN + ENGINEERING
1641 Kains Avenue, Berkeley, California 94702

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LITCHFIELD SOLAR

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TORRINGTON, CT 06790, USA.
LAT: 41.794157°N
LON: 73.168028°W

REV. NO	DESCRIPTION	DATE
0	PRELIMINARY	05/03/21

SHEET TITLE:
ARRAY DETAILS

PROJ. MGR.	PROJ. ENGR. SDE	DATE: 05/03/21
DRAWN BY: LR	CHECKED BY:	SCALE: AS SHOWN
DRAWING NO.		

PV-104

LITCHFIELD SOLAR

2-298 ROSSI RD
TORRINGTON, CT 06790, USA.
LAT: 41.794157°N
LON: 73.168028°W

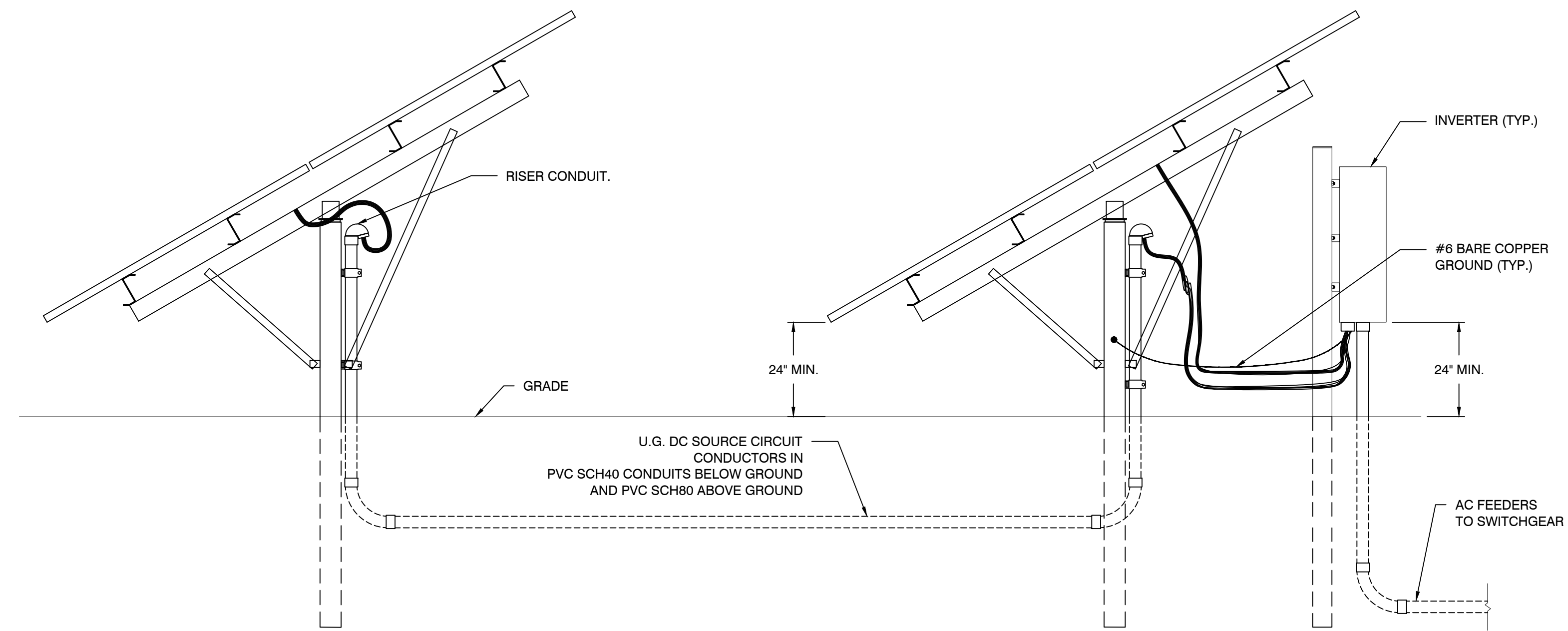
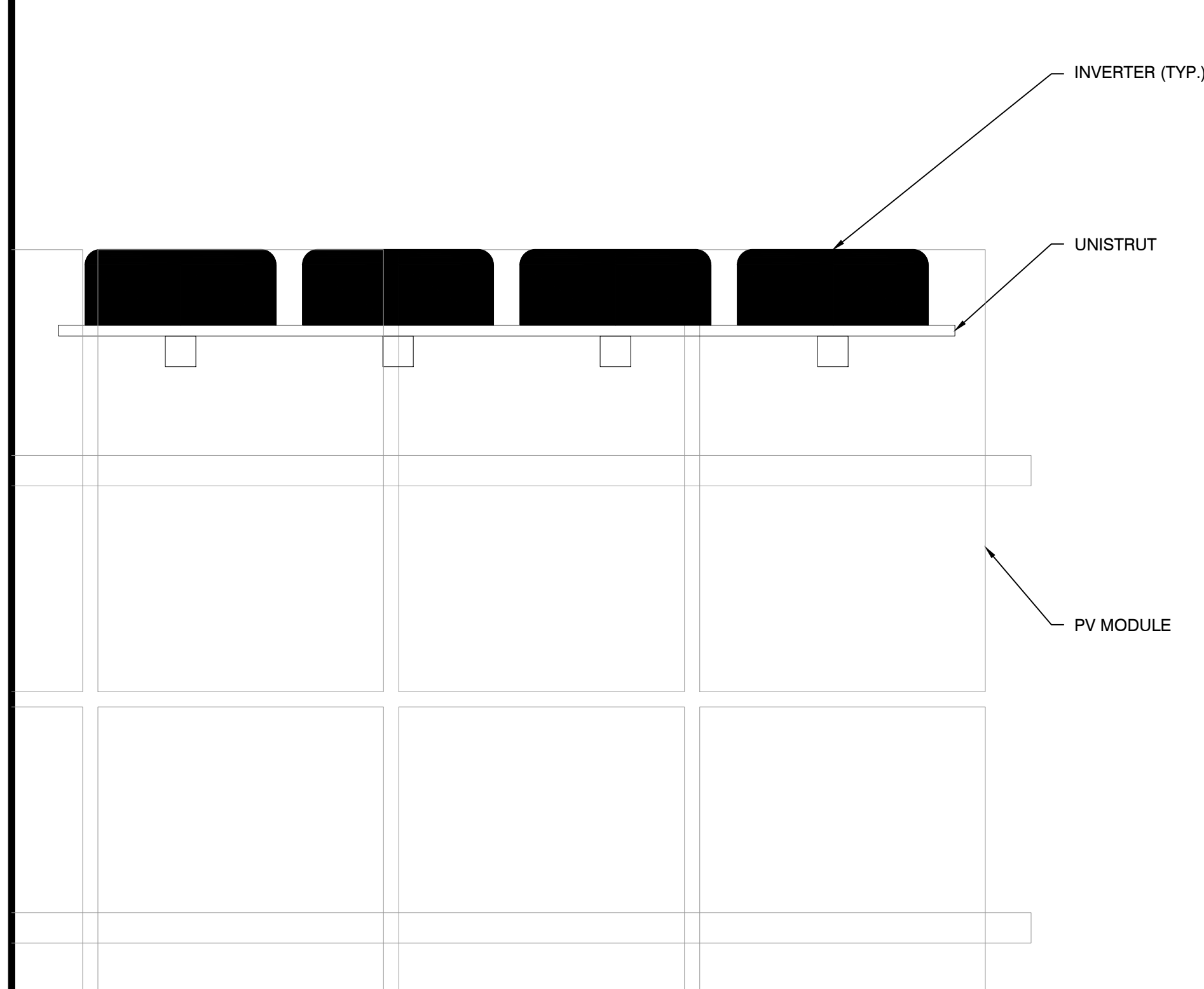
REV. NO	DESCRIPTION	DATE
0	PRELIMINARY	05/03/21

SHEET TITLE:

INVERTER ELEVATION DETAILS

PROJ. MGR.	PROJ. ENGR. SDE	DATE: 05/03/21
DRAWN BY: LR	CHECKED BY:	SCALE: AS SHOWN
DRAWING NO.		

PV-105

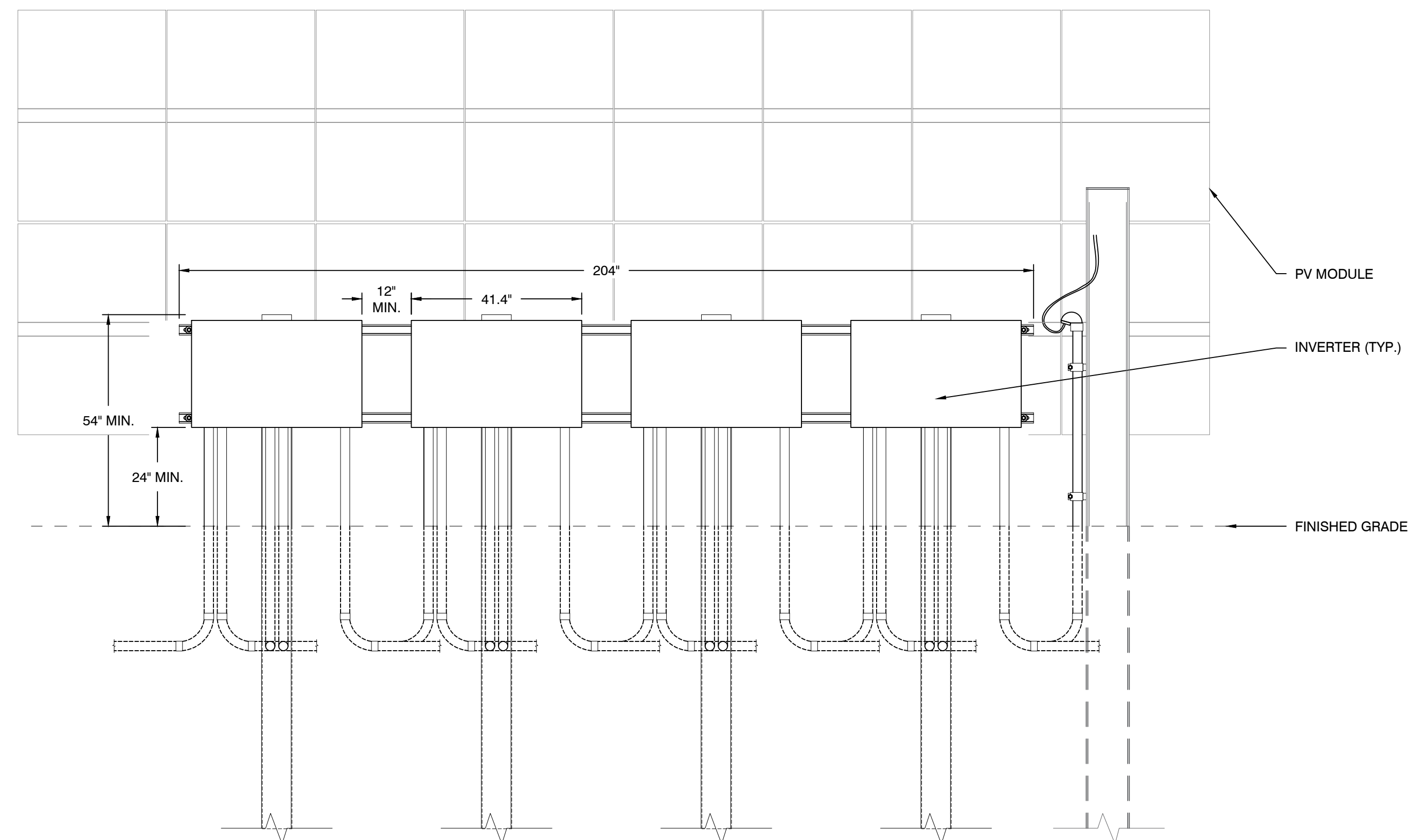


1 INVERTER MOUNTING (PLAN VIEW)
PV-105

Scale: NTS

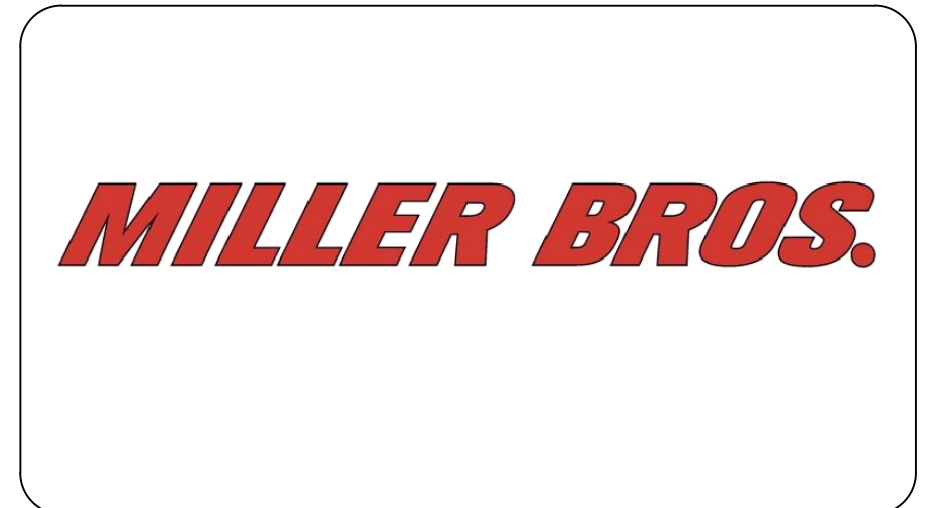
2 INVERTER ELEVATION (SIDE VIEW) AND DC SOURCE CIRCUIT (JUMPER) TRENCH DETAIL
PV-105

Scale: NTS



3 INVERTER ELEVATION (FRONT VIEW)
PV-105

Scale: NTS



LITCHFIELD SOLAR

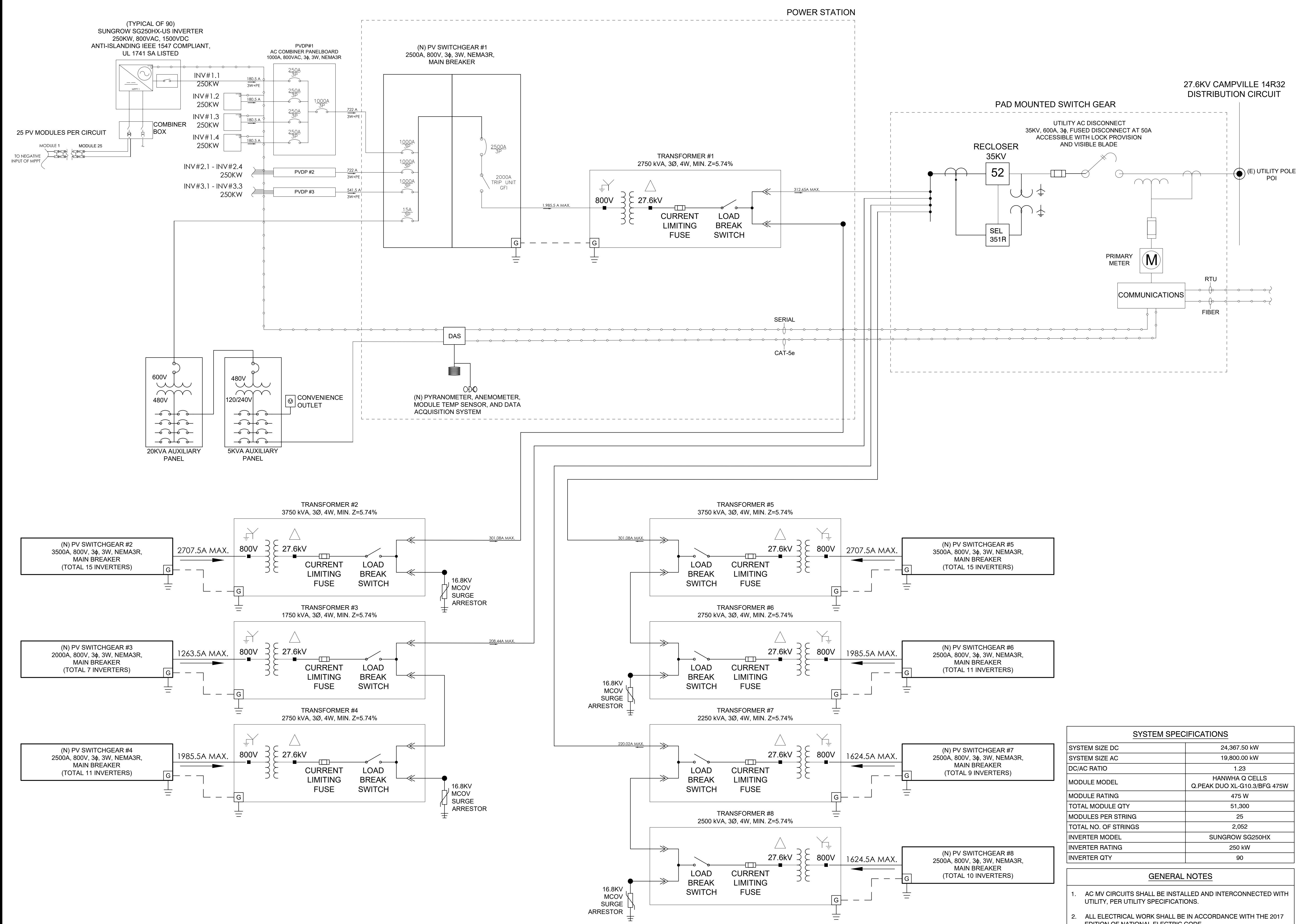
2-298 ROSSI RD
TORRINGTON, CT 06790, USA.
LAT: 41.794157°N
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0	PRELIMINARY	05/03/21
REV. NO	DESCRIPTION	DATE

SHEET TITLE:
SINGLE LINE DIAGRAM

PROJ. MGR.	PROJ. ENGR. SDE	DATE:
DRAWN BY: LR	CHECKED BY:	SCALE: AS SHOWN
DRAWING NO.		

E-100



SYSTEM SPECIFICATIONS	
SYSTEM SIZE DC	24,367.50 kW
SYSTEM SIZE AC	19,800.00 kW
DC/AC RATIO	1.23
MODULE MODEL	HANWHA Q CELLS Q.PEAK DUO XL-G10.3/BFG 475W
MODULE RATING	475 W
TOTAL MODULE QTY	51,300
MODULES PER STRING	25
TOTAL NO. OF STRINGS	2,052
INVERTER MODEL	SUNGROW SG250HX
INVERTER RATING	250 kW
INVERTER QTY	90

- GENERAL NOTES**
- AC MV CIRCUITS SHALL BE INSTALLED AND INTERCONNECTED WITH UTILITY, PER UTILITY SPECIFICATIONS.
 - ALL ELECTRICAL WORK SHALL BE IN ACCORDANCE WITH THE 2017 EDITION OF NATIONAL ELECTRIC CODE.
 - ALL DC AND AC EQUIPMENT, WHERE APPLICABLE, SHALL BE LISTED AND LABELED PER RECOGNIZED ELECTRICAL TESTING LABORATORY AND INSTALLED PER THE LISTING REQUIREMENTS. THE MANUFACTURER'S INSTRUCTIONS AND IN ACCORDANCE WITH NEC.
 - RECLOSER CONTROL SETTINGS TO BE COORDINATED WITH UTILITY AND CONTRACTOR.

1 LITCHFIELD SOLAR SINGLE LINE DIAGRAM

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When reviewing Exhibit 1: Overall Site Plan, the following narrative legend/key may be useful:

- Blue “LOD” Line – New revised Limit of Disturbance
- Green “LOD” Line – Previous Limit of Disturbance
- Blue Ponds – New Revised Stormwater Ponds
- Green Ponds – Previous Stormwater Ponds
- Red Dotted Line – 100’ Gulf Stream Buffer
- Gray Thick Line – Previous Road, Now Removed
- Parallel Solid Black Lines – New Revised Road
- Grey Hatch marks = Previous Tree Clearing, Not Occurring Under Redesign

Impetus for the Redesign

As noted above, SR Litchfield has been listening to concerns raised by neighbors and the Town and seriously considering and evaluating the questions posed in the Council’s interrogatories and the concerns raised in the comments from several state agencies. While SR Litchfield had anticipated many of these questions and concerns surrounding its original design, it was constrained in its options to address them due to its contractual commitment under its Power Purchase Agreement (PPA), the output of the available solar modules, and topography and environmental conditions at the Site.

As the output of the solar modules was the only one of these variables within SR Litchfield’s control to change, even prior to submitting its Petition SR Litchfield had been aggressively exploring alternative module options. In April, SR Litchfield was able to secure a sufficient supply of Hanwha QCell’s newest solar module – Q.Peak Duo XL-G10.3/BFG 475. These bifacial modules will provide a significantly higher wattage (output) than the module considered as part of the original Project design.

As a result of the increased output per module, SR Litchfield was able to meet its contractual obligation under the PPA using fewer modules. By reducing the number of modules, SR Litchfield’s design team was provided increased flexibility in the Project layout. SR Litchfield used this flexibility to address what it perceived to be the most significant concerns and questions raised to date, whether by the Council, the Town, neighbors, or other state agencies.

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The redesigned Project reflects: (i) a significant reduction in the Limit of Disturbance area; (ii) a substantial reduction in tree clearing; (iii) removal of modules from steep slopes; (iv) a significant reduction in site grading (v) an increase in setbacks from important environmental features (*e.g.*, wetlands, vernal pools, and Gulf Stream); (vi) the elimination of any activity within a one hundred foot (100') buffer of Gulf Stream; and (vii) a considerable decrease in overall wetland disturbance.

Project Modifications

Exhibit 1: Overall Site Plan is broken down into sections identified as Area 1, Area 2, and Area 3. The Project modifications are summarized below in each of these areas.

Area 1

Starting at the access roadway off Highland Avenue to the north, this existing access driveway will now be used to access the Project's northern-most array fields. This access roadway will be narrowed to twelve feet (12'), narrower than SR Litchfield would typically construct, to reduce wetland impacts. Retention walls (gabion blocks) will be used to support this access driveway and further minimize the impact on the wetland. This approach is partially responsible for the reduction in a more than fifty percent (50%) overall reduction in wetland disturbance between the original Project design and the redesigned Project.

Next, turning to the area east of the Eversource transmission line easement and west of the properties along Wimbledon Gate North, several rows of solar modules were eliminated from the Project design. These modules had been located to the south. By removing these modules, a considerable amount of earth-work and grading was eliminated. Additionally, the Limit of Disturbance was retracted considerably in this area resulting in a significant reduction in the amount of tree clearing, contributing to the more than sixty-two percent (62%) overall reduction in tree clearing from the original Project design. Furthermore, Stormwater Pond 9 was reduced in size and moved to the north and off of the steeper slopes. These changes also increased the distance between any development activity the Wimbledon Gate North residences to the east.

Similar modifications were also made in the area to the west of the Eversource transmission line easement and east of Gulf Stream. Stormwater Pond 14 was reduced in size and the discharge towards Gulf Stream was eliminated. The Limit of Disturbance was contracted substantially in this area. A significant level of tree clearing was also eliminated. These modifications increased the buffer in this area between development activity and the Gulf Stream riparian corridor to a minimum of one hundred feet (100').

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These modifications resulted in a reduction of the Limits of Disturbance in Area 1 by approximately 6.5 acres and a reduction of tree clearing in Area 1 by approximately 6.3 acres. Overall, these modifications are a significant contributor to the more than twenty-five percent (25%) reduction in overall site disturbance (*e.g.*, clearing, grading, fencing), including a more than eighty percent (80%) reduction in grading, from the original Project design.

Area 2

Starting with the small solar array directly east of Rossi Road and north of the intersection with Town Farm Road, Stormwater Pond 4 and its discharge point were moved outside of the one hundred-foot (100') buffer from Gulf Stream. These modifications eliminated all development activity in this area from the one hundred foot (100') Gulf Stream riparian corridor.

Further, the access roadway from Rossi Road was eliminated and replaced with a smaller Site entrance driveway added perpendicular to Rossi Road. The elimination of this access roadway eliminates the crossing of Gulf Stream and the need to install a culvert over Gulf Stream. This modification significantly reduced wetland impacts and preserved Gulf Stream in its current state. It also eliminated a sizable amount of roadway on the east side of Gulf Stream. By removing this roadway, the Limit of Disturbance in this area was reduced and brought outside the one hundred foot (100') Gulf Stream buffer.

The redesign also eliminated the underground electric line that would have extended from the solar array east of Rossi Road to the solar array south of Town Farm Road and would have traversed a wetland and a tributary of Gulf Stream. Instead, if this electric line is necessary, it would now be placed overhead. The overhead electric line would have a clear span over Gulf Stream and the bordering wetlands in order to avoid any direct impact within Gulf Stream and the one hundred foot (100') Gulf Stream buffer. This overhead line would also be positioned along the existing farm road that crosses Gulf Stream, an area that is already cleared of vegetation, to avoid the need for any additional tree or vegetation clearing within or bordering Gulf Stream, thereby eliminating any direct or indirect impacts.

These modifications eliminated activity within the Gulf Stream riparian corridor. Avoiding the additional tree or vegetation clearing within or bordering Gulf Stream were a priority of SR Litchfield. SR Litchfield recognizes the ecological value of Gulf Stream as a regionally important cold-water fisheries and has placed preservation of this important resource as a priority when making design modifications. SR Litchfield also valued the Council's interrogatories related to the impacts to and around Gulf Stream, as well as the comments from CEQ and DEEP.

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Moving to the area east of Gulf Stream, the laydown area east of Stormwater Pond 8/10 was eliminated. Stormwater Pond 8/10 was also substantially reduced in size, moved to the east and away from Gulf Stream, and its discharge point was moved outside the one hundred foot (100') Gulf Stream buffer. In general, the Limit of Disturbance in this area was reduced considerable. This resulted in a sizable reduction in tree clearing along the east side of the Gulf Stream riparian corridor.

In the small area to the east of the Eversource transmission line easement, south of Stormwater Pond 5, and west of the Site boundary, the internal access roadway was eliminated. This allowed the Limit of Disturbance in this area to be reduced to a location more than one hundred feet (100') from the wetlands in the area of Vernal Pool 2. The elimination of the roadway in this area also eliminated another culvert crossing.

Continuing south along the eastern property border, Stormwater Pond 11 was modified to move the discharge point from the southeast corner to the southwest corner. This modification was made after several discussions with the adjacent property owner (68 Wilson Road). The goal of the change is to better manage the discharge and any stormwater runoff from affecting the adjacent property owner's property. While SR Litchfield and its consultants were confident that the prior design of Stormwater Pond 11 did not pose a risk to the adjoining property, it nevertheless undertook to address the owner's concerns.

Similarly, the Limit of Disturbance along the property line with 68, 84, and 86 Wilson Road was significantly reduced; in many places the limits of disturbance were reduced by more than one hundred feet (100'). This not only will reduce the tree clearing in this area, but it will preserve a natural buffer with these adjoining properties. To achieve this reduction in the Limit of Disturbance in this area, several rows of modules on steep slopes near Stormwater Pond 7 were eliminated. Allowing a sizeable reduction in grading in this area. Stormwater Pond 7 was also redesigned and moved north. The discharge point for Stormwater Pond 7 was also modified and it no longer has a direct discharge into wetlands.

Perhaps one of the more significant additions to the Project design was the addition of an access roadway from east side of Wilson Road. This access roadway is a replacement for the access driveway that previously crossed Gulf Stream. SR Litchfield seriously considered the Council's Interrogatory No. 48 and conducted a comprehensive evaluation of the Council's suggested approach. While the new access roadway will have grades up to twenty percent (20%), require cut and fill slopes in previously undisturbed and forested areas, and will result in a Limit of Disturbance (a roadway) that is fifty feet (50') from two separate wetlands, SR Litchfield agreed with the Council that when compared with the impacts the former access roadway would have to

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Gulf Stream and the adjacent wetlands this option was ecologically and environmentally preferable.

Taken together, the significant and positive changes made to the Project design in Area 2 resulted in a reduction of the Limit of Disturbance by approximately 11.75 acres. They also resulted in a reduction of tree clearing by approximately 9 acres. Both very significant reductions and improvements.

Area 3

Moving west of Wilson Road, the access roadway on the west side of Wilson Road was eliminated. Stormwater Pond 2 was also changed to two (2) separate ponds – Pond 2A and Pond 2B. These two changes allowed the Limit of Disturbance to be reduced, a sizeable amount of tree clearing to be eliminated, and Stormwater Pond 2B to be moved outside of the one hundred foot (100') Gulf Stream buffer. In addition, Stormwater Pond 2B (formerly Pond 2) no longer has a direct discharge to Gulf Stream.

Moving north, Stormwater Pond 1 was similarly modified and moved north out of the one hundred foot (100') buffer for a tributary of Gulf Stream and more than one hundred feet (100') from the nearest wetland. Similarly, the Limit of Disturbance was also moved outside of these buffers to once again draw development activity away from wetlands and watercourses and reduce the need for grading and tree clearing.

In the area north of Town Farm Road and west of Rossi Road, Stormwater Pond 3 was reduced in size substantially, resulting in the Limit of Disturbance in this area being reduced and removed from the one hundred foot (100') buffer for a tributary of Gulf Stream. This also provided a larger buffer between the wetlands in this area and development activity. In fact, the Limit of Disturbance around the entire solar array field in this area was reduced. Thus, moving development activity further away from neighboring properties and away from wetlands and watercourses.

Importantly, the laydown area in the northern portion of this array was moved to the south. This places the laydown area outside the one hundred foot (100') vernal pool envelope (VPE) for Vernal Pool 1. This change is in direct response to the Council's inquiry in Interrogatory No. 59. With this change, there will be no permanent or temporary disturbances within the VPE for either Vernal Pool 1 or Vernal Pool 2.

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Altogether the changes made to the Project design in Area 3 resulted in a total reduction of the Limit of Disturbance in this area by approximately 4.3 acres. Tree clearing in this area was reduced by approximately 0.6 acres.

Conclusion

As compared with the original Project design, the redesign resulted in:

- an approximately fifty percent (50%) reduction in the amount of earthwork;
- an approximately thirty percent (30%), on average, reduction to the size of Stormwater Ponds;
 - Where possible, infiltration trenches will be used to meet DEEP's quality and quantity requirements.
 - Sediment traps and compost filter socks will also be used throughout the Site during construction to capture sediment runoff at point source.
- the maintenance of a one hundred foot (100') buffer from Gulf Stream and its tributaries throughout the Site;
- the maintenance of a one hundred foot (100') buffer from both vernal pools on the Site;
- the establishment of a one hundred foot (100') buffer upstream of all wetlands on the Site;
- the reduction of wetland disturbance by more than fifty percent (50%);
- the reduction of the overall disturbance (grading, clearing, fencing, etc.) site-wide by more than twenty-five percent (25%);
- the reduction of grading site-wide by more than eighty percent (80%); and
- the reduction of tree clearing (six inches (6") breast height) by more than sixty-two percent (62%).

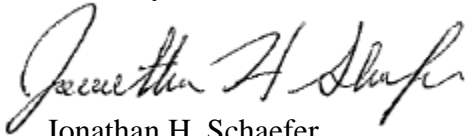
Robinson+Cole

Melanie Bachman
May 14, 2021
Page 8

I hereby certify that on this date a copy of this filing was sent via electronic mail to Dominick J. Thomas, Esq. (djt@cohen-thomas.com).

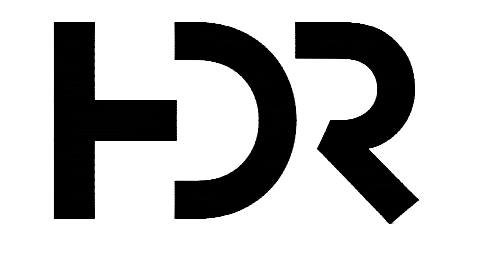
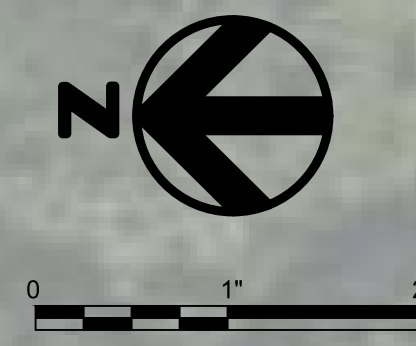
If you have any questions concerning this submittal, please contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan H. Schaefer". The signature is written in a cursive style with a large initial "J".

Jonathan H. Schaefer

Enclosures (revised Preliminary Site Layout Plan (Petition Exhibit A (rev. 05.03.21) and a map illustrating the modifications made to the original Project design (Exhibit 1; Overall Site Plan (05.12.21)))



NOT FOR CONSTRUCTION

LITCHFIELD SOLAR
2-298 ROSSI RD
TORRINGTON, CT 06790, USA
LAT: 41.794157°N
LON: 73.168028°W

LITCHFIELD, CT

REV. NO	DESCRIPTION	DATE

SHEET TITLE:
OVERALL SITE PLAN

PROJ. MGR. WK	PROJ. ENGR. MB	DATE: 05/12/21
DRAWN BY: NC	CHECKED BY: CP	SCALE: 1"=200'

DRAWING NO.
EXHIBIT1

EXHIBIT1.1

EXHIBIT1.2

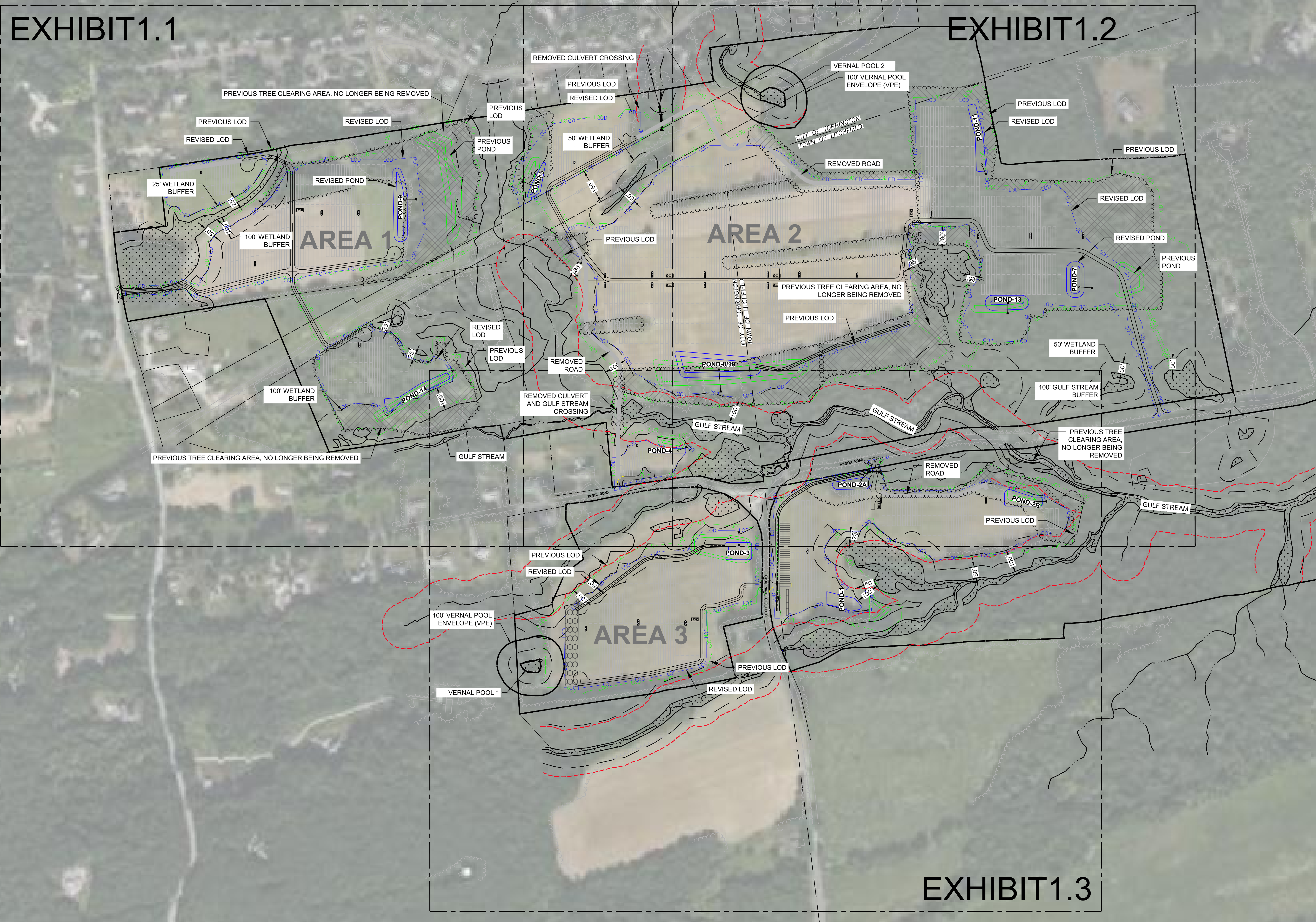
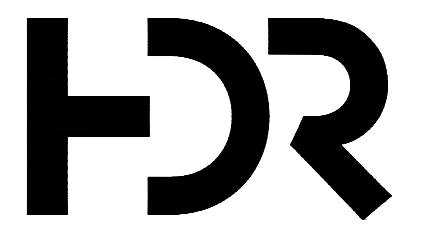


EXHIBIT1.3



NOT FOR
CONSTRUCTION

LITCHFIELD SOLAR

2-298 ROSSI RD
TORRINGTON, CT 06790, USA
LAT: 41.794157°N
LON: 73.168028°W

LITCHFIELD, CT

REV. NO	DESCRIPTION	DATE

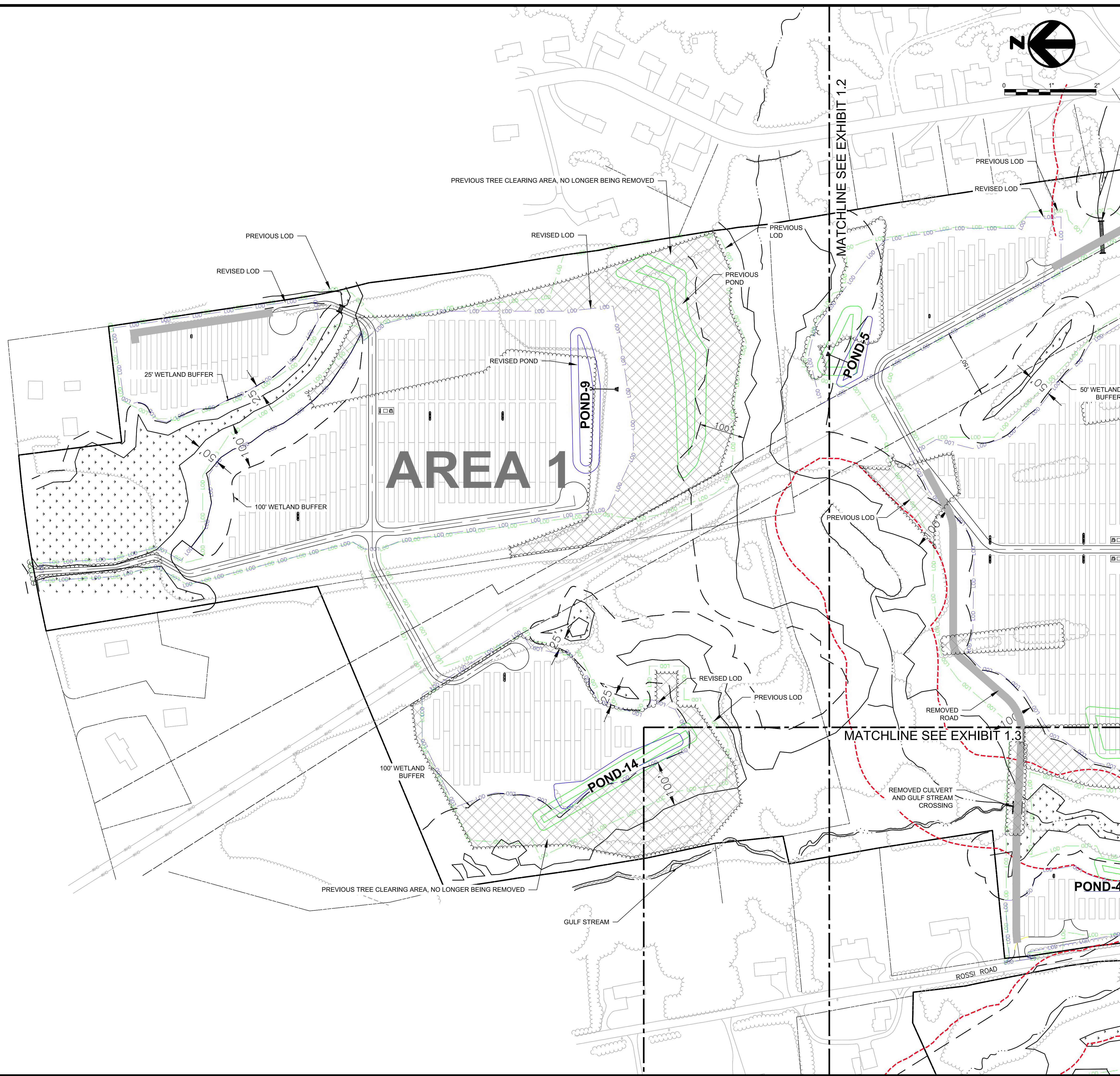
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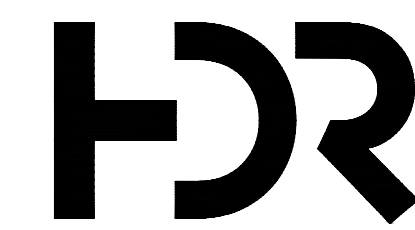
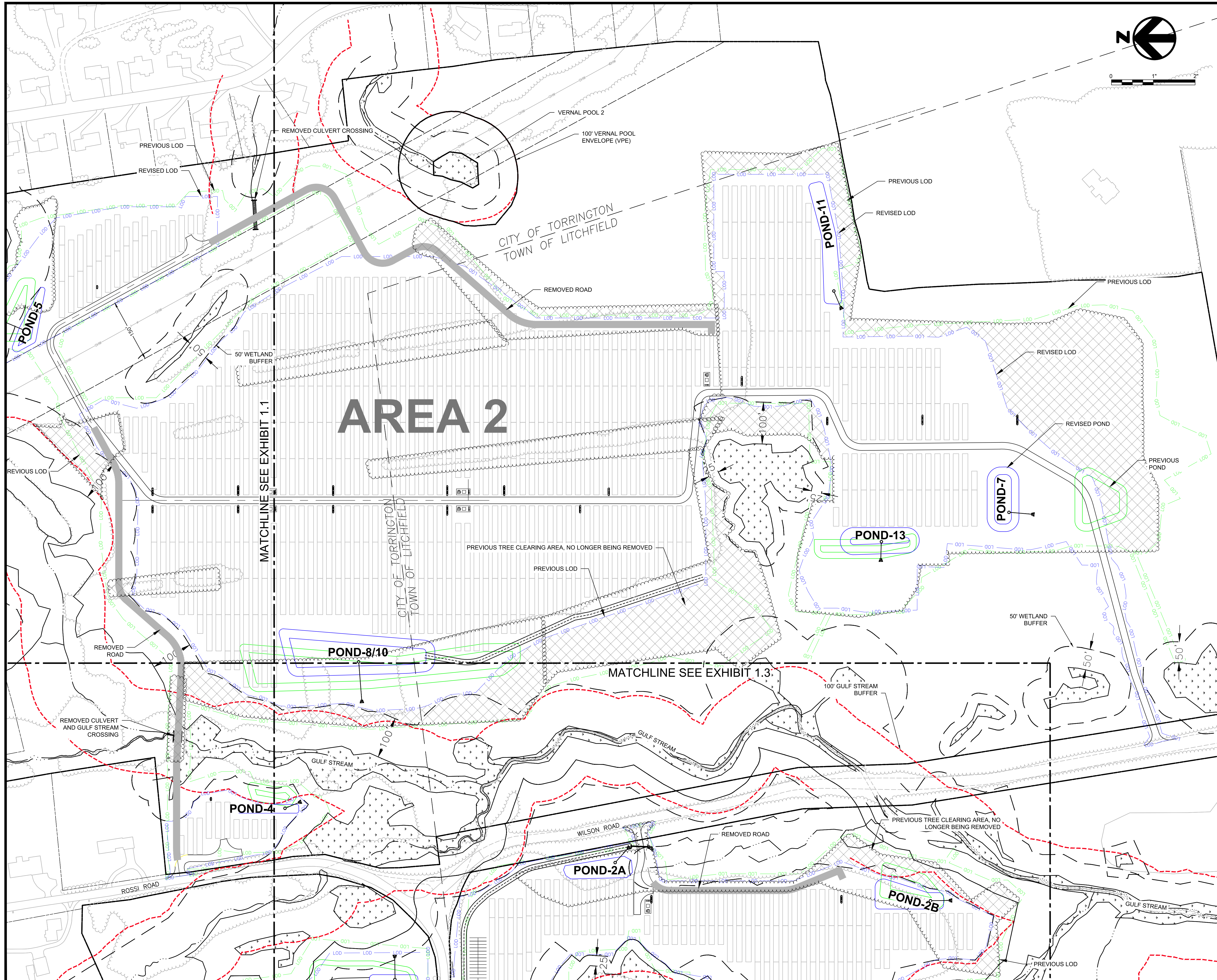
VIEW PLAN 1

PROJ. MGR. WK	PROJ. ENGR. MB	DATE: 05/12/21
DRAWN BY: NC	CHECKED BY: CP	SCALE: 1"=100'

DRAWING NO.

EXHIBIT 1.1





**NOT FOR
CONSTRUCTION**

**LITCHFIELD
SOLAR**

2-298 ROSSI RD
TORRINGTON, CT 06790, USA
LAT: 41.794157°N
LON: 73.168028°W

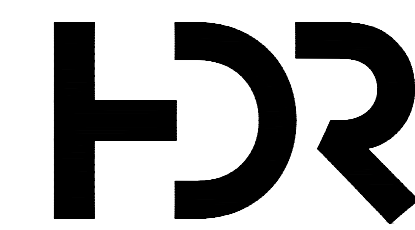
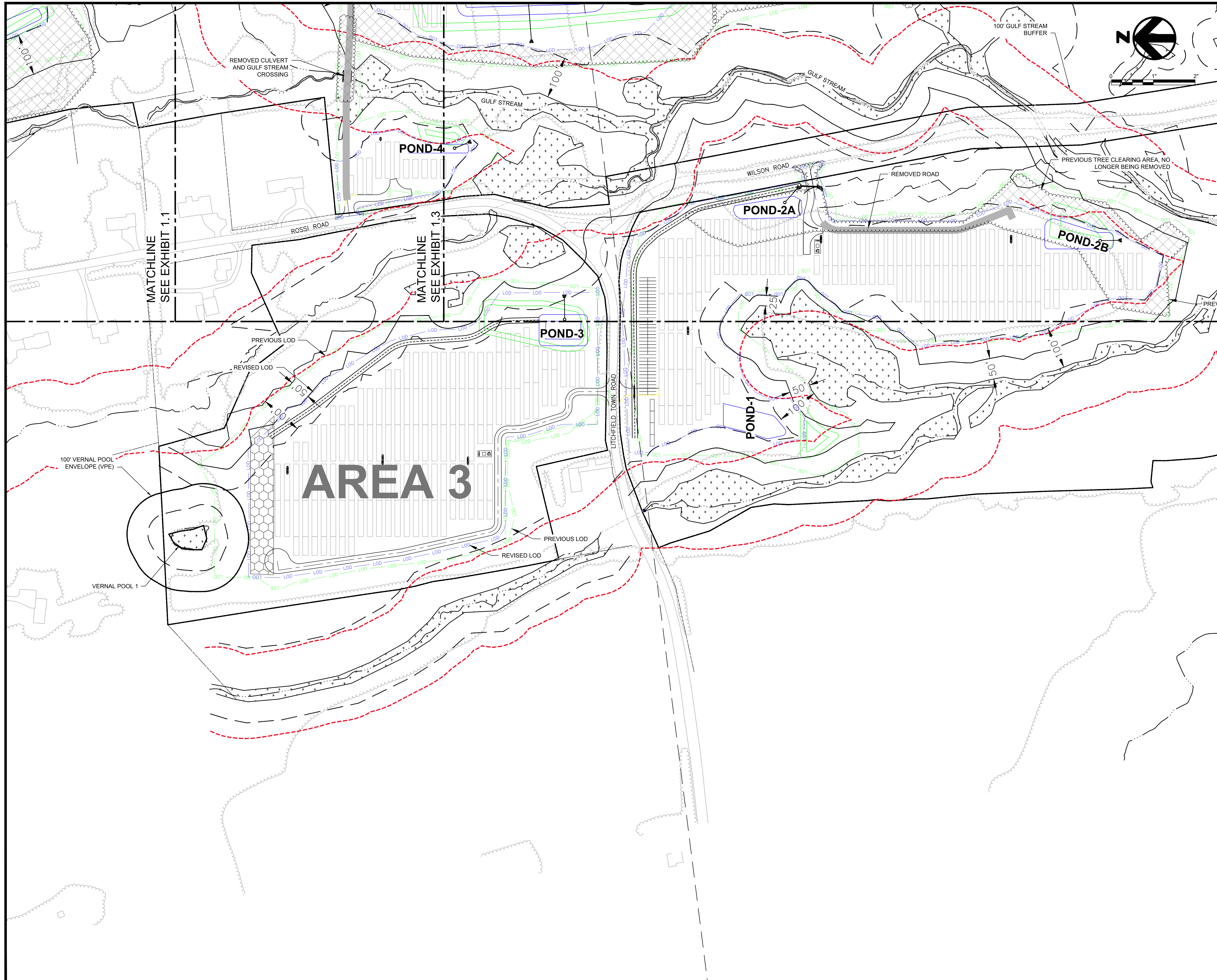
LITCHFIELD, CT

REV. NO	DESCRIPTION	DATE

SHEET TITLE:
AREA 2 COMPARISON MAP

PROJ. MGR. WK	PROJ. ENGR. MB	DATE: 05/12/21
DRAWN BY: NC	CHECKED BY: CP	SCALE: 1"=100'
DRAWING NO.		

EXHIBIT 1.2



**NOT FOR
CONSTRUCTION**

**LITCHFIELD
SOLAR**
 2-298 ROSSI RD
 TORRINGTON, CT 06790, USA
 LAT: 41.794157°N
 LON: 73.168028°W

LITCHFIELD, CT

REV. NO	DESCRIPTION	DATE

SHEET TITLE:
AREA 3 COMPARISON MAP

PROJ. MGR. WK	PROJ. ENGR. MB	DATE: 05/12/21
DRAWN BY: NC	CHECKED BY: CP	SCALE: 1"=100'

DRAWING NO.
EXHIBIT1.3