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Via First Class Mail and Electronic Mail (siting.council@ct.gov)

October 25, 2023

Melanie A. Bachman, Esq.
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.**

Partial Development & Maintenance Plan III

Dear Ms. Bachman:

Enclosed please find an original and fifteen (15) copies of SR Litchfield, LLC's Partial Development & Maintenance Plan III. Due to the size of the Attachments to this filing (approximately 80 MB) a link¹ to download a copy of Attachments 1 through 6 is being provided to the Connecticut Siting Council ("Council") in order to access an electronic version.

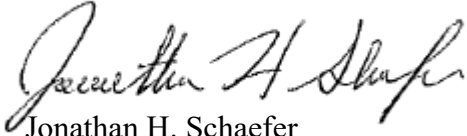
As Attachments 1 through Attachment 6 are being filed as bulk exhibits, only two (2) copies of these attachments are being mailed to the Council as part of this filing. Should the Council require additional copies of any of these Attachments, please let me know.

¹ <https://transfer.rc.com/message/30ae0PBo0nMhPaxIUA35xh>

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If you have any questions or need any additional information regarding this Project, please feel free to contact me.

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

Copy to (via email):

Ronald M. Viola, Trustee (vmron@yahoo.com)

Dominick J. Thomas, Esq. (djt@cohen-thomas.com)

The Honorable Elinor C. Carbone, Mayor, City of Torrington
(Elinor_Carbone@torringtonct.org)

The Honorable Denise Raap, First Selectwoman, Town of Litchfield
(1stselectman@townoflitchfield.org)



Petition No. 1442 - SR Litchfield, LLC

PARTIAL DEVELOPMENT & MANAGEMENT PLAN III

1. Introduction

SR Litchfield LLC (“SRL”) hereby submits its Partial Development and Management Plan III (the “D&M Plan III”) for the SRL solar facility in Litchfield and Torrington, Connecticut (the “Project”). The Connecticut Siting Council (the “Council”) approved the Project by Decision and Order on September 23, 2021 (“Decision”) in Petition No. 1442 (“Petition”). The Council approved SRL’s Partial Development and Maintenance Plan I (“D&M Plan I”) on January 13, 2022 and SRL’s Partial Development and Maintenance Plan II (“D&M Plan II”) on June 9, 2023. More recently, the Council approved revisions to D&M Plan I on October 18, 2023.

This D&M Plan III includes the following:

- a. the completion of stump removal and clearing of scrub and brush within the Project areas to be cleared in accordance with the approved Partial D&M Plans I & II
- b. installation of security fencing and gates;
- c. site grading within the Project area in preparation for construction and installation of the solar arrays;
- d. limited blasting of bedrock as needed, including but not limited to access roads and basins necessary for construction of the site access road from Wilson Road;¹
- e. installation of all remaining temporary and permeant stormwater controls, basins, and swales in accordance with the Department of Energy and Environmental Protection’s approved General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (“Stormwater Permit”);
- f. the installation of additional soil erosion and sediment control (“SESC”) measures as required under the Stormwater Permit;
- g. the installation of all solar panels, framing, and racking structures consistent with a final structural design stamped by a Professional Engineer duly licensed in the State of Connecticut;
- h. the installation of all electrical equipment associated with the solar arrays;
- i. the installation and connection of all electrical interconnection equipment;

¹ SRL is preparing a Controlled Blasting Plan for the Project and will apply for a Blasting Permit from the appropriate local agencies. A copy of the Controlled Blasting Plan and Blasting Permit will be submitted to the Council prior to the commencing construction activities described in this D&M Plan III.

- j. the implementation of a final Landscaping Plan; and
- k. all final grading and site stabilization activities.

SRL provided the Council with a notice of commencement of construction for D&M Plan I activities on October 17, 2023, which stated that D&M Plan I activities would begin on or about November 6, 2023. SRL plans to provide the Council a similar notice prior to the commencement of construction activities as described in the approved Partial D&M Plan II and this Partial D&M Plan III.

A. Erosion and Sediment Control Activities

Prior to commencing D&M Plan I construction activities on or about November 6, 2023, SRL’s onsite contractor 301 Allan Wood General, LLC (“AWG”) will hold an on-site pre-construction conference to discuss erosion control measures with DEEP’s Stormwater Pollution Control Plan designated inspector. The Project Compliance Monitor Wetland Scientist will also attend the pre-construction conference to ensure there is coordination with the wetland, watercourse, and rare species protection measures, which rely in part on proper installation and maintenance of erosion control measures.

Prior to commencing civil work, a professionally licensed survey crew will mobilize to the Project site to establish benchmarks. Once benchmarks are established, the crew will mark and stake the limit of disturbance (“LOD”) and other sensitive areas within and surrounding the Project boundaries. Following the boundary staking, construction of the planned stormwater features and other site civil items (roads, crossings, etc.) will begin.

Construction activities in Partial D&M Plan III will be sequenced in three phases. Phase 1 Construction Sequence is summarized on Sheets C501 and C502 in the Site Civil Design Plans.² Additional construction phasing activities are summarized in the Site Civil Design Plans on Sheet C550. Phase 2 and Phase 3 Construction Sequences are summarized on Sheets C503 and C504 in the Site Civil Design Plans. Additional construction phasing activities are summarized in the Site Civil Design Plans on Sheet C551. All construction activities will be conducted in accordance with the Civil Notes and the Environmental Notes in the Site Civil Design Plans Sheets C002 and C003, respectively, as well as the other notes included throughout the Site Civil Design Plans.

B. PV Construction Activities

The Racking Engineering Plans and Electrical Site Layout to be utilized as part of the following activities are attached as **Attachment 1** and **Attachment 2**, respectively. The latest Site Layout and Array Details are also attached as **Attachment 3**. The Site Civil Design Plans provided to the Council in SRL’s October 16, 2023 submission remains the latest version and is attached here as **Attachment 4**, for ease of reference.

Layout

A professionally licensed survey crew will mobilize to stake each post for the racking as well as

² The current Site Civil Design Plans were provided to the Council as Attachment 4 to SRL’s October 16, 2023 correspondence.

the equipment pads.

Rack/UG Electric Installation

Racking equipment, installation machinery, and crews will be mobilized to an area, once stabilized, to commence installation of racking and underground facilities. The overall racking and underground facilities installation will occur over several months. First, installation of ground screws will commence, concurrently with the underground infrastructure and equipment pads. Underground infrastructure is inclusive of excavation, cabling and conduit placement, backfill, compaction, and temporary/final restoration. Approximately one month after ground screw and underground infrastructure installation commences, the remaining vertical racking pieces and horizontal purlins will be installed.

Module/String Cable Installation

Solar module (panel) installation will begin once approximately half of the racking installation is able to receive the modules. Track-mounted equipment and additional crews will be utilized to handle, stage, and install the modules on the racks. Modules will be secured and torque marked at the end of every day. Once sufficient modules are mounted, installation of the string cable will start behind the modules and secured to the rack. This is necessary to connect all of the modules.

Equipment Installation

SRL’s onsite contractor, AWG, will coordinate logistics for the electrical equipment (inverters, switchgear, etc.) for the site. All of the equipment foundations and supports, installed during the Rack/UG Electric Installation phase, will be ready to accept the equipment before it arrives. The equipment will be secured and installed immediately upon receiving it at the site.

Cabling Installation

After the UG infrastructure and equipment installation is complete installation of the cabling into the various pieces of equipment will be finished. Any spot restoration will be completed at this time. AWG will terminate the cabling, perform grounding/bonding, and other remaining electrical items. The system will be wired at the completion of this task.

IC Installation

The interconnection (IC) installation includes the medium voltage (MV) interconnection switchgear and the pole cluster that attaches to the existing Eversource infrastructure. This installation will be scheduled concurrently with the other construction of the PV plant. It is anticipated that this installation will take place in the Summer of 2024.

Testing/Closeout

Once the system is constructed cold commissioning will commence. This will ensure that the facility is wired correctly. Eversource will connect to the system and provide backfeed power. Then hot commissioning will be performed, which ensures that the system is producing as designed. Eversource will conduct a witness test to validate the safety and performance of the

facility. Final restoration efforts to be put in place.

C. Management Contact Information

All of the construction activities at the Project site will be managed by Joe Marrone who can be reached at (610) 506- 6111.

AWG will be the site contractor and will be involved in all Phase I, II, and III activities. AWG's Construction Manager throughout Phase I, II, and III will be Peter LaCamera who can be reached at (610) 246-1267.

Robert Goodgame is the SRL's Project Manager overseeing Phase I, II and III can be reached at 615-760-4455.

2. Council Decision Conditions

Condition 2 of the Council's Declaratory Ruling required the following information to be included in the D&M Plan:

- a. **A final site plan including, but not limited to, final facility layout, access roads, fence design, equipment pads, stormwater management control structures, electrical interconnection including riser pole locations and increased setbacks to the property at 1119 Highland Avenue, Torrington;**

Final site plans are included in the Site Civil Design Plans on Sheets C600 and C601. Other sheets within the Site Civil Design Plans include additional detail on the Project's final layout.

- b. **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 measures during construction, inspection and reporting protocols, methods for periodic cleaning of temporary sediment traps and swales during construction, and final cleaning of stormwater basins upon site stabilization;**

SRL provided portions of the erosion and sedimentation control plan specific to tree clearing/grubbing in Partial D&M Plan I.

Additional detail regarding erosion and sedimentation controls for Partial D&M Plan III are provided in the Site Civil Design Plans, as summarized above.

- c. **Site construction detail/phasing plan including, but not limited to, construction laydown area, site clearing/grubbing, site grading, soil stockpile locations, excess earth material disposal locations, wetland mitigation measures; and NDDDB species protective measures;**

SRL provided portions of the construction detail/phasing plan specific to tree clearing/grubbing, including DEEP recommended measures to protect species listed on the DEEP NDDDB, in Partial D&M Plan I.

Additional construction detail, including but not limited to excavation and grading to establish temporary and permanent stormwater controls, access drive construction, installation of Project site perimeter fencing, and establishment of additional erosion and sedimentation controls are detailed in the Site Civil Design Plans, as summarized above.

d. A final DEEP NDDDB determination letter prior to commencement of construction;

As part of Partial D&M Plan II, SRL submitted the final DEEP NDDDB letter for the Site, dated April 28, 2022. The letter details recommended construction and post-construction protective measures for state-listed bat (2), turtle (1), bird (3) and plant (1) species known to occur within or proximate to the Site.

Recommended protective measures for state-listed rare species have been included in the Site Civil Design Plans Sheet C003 (Environmental Notes) to ensure the implementation of the recommended species protection measures listed in the DEEP NDDDB Determination letter dated April 28, 2022.

e. A final Landscaping Plan including, but not limited to, landscape plantings, pollinator plantings, and final seed mix;

As part of Partial D&M Plan II, SRL submitted the final Landscaping Plan. The plan includes the installation of 312, 15-foot tall American Holly shrubs in areas where the Site abuts residential parcels located on Wimbledon Gate and Highland Avenue in Torrington and on Town Farm Road in Litchfield. Additional plantings will occur near the intersection with Town Farm Road and Rossi Road to screen open views and to provide some cover vegetation for wildlife that may use nearby wetland areas.

Final stabilization will utilize various seed mixes for different areas of the site. The solar field areas will be seeded using a mix that includes a variety of grasses and forbs, including native species that support pollinator wildlife species. Areas outside of the solar array limits will be seeded with a conservation mix that contains a larger component of wildflowers than areas within the solar array limits. The stormwater basins and swales will be seeded with an erosion control/restoration seed mix that include species tolerant of moist areas.

f. A final structural design for the racking system, stamped by a Professional Engineer duly licensed in the State of Connecticut prior to commencement of construction;

Racking Engineering Plans and Electrical Site Layout to be utilized as part of the following activities are attached as Attachment A and Attachment B, respectively. A final version of the Racking Engineering Plans stamped by a Professional Engineer duly licensed in the State of Connecticut will be submitted prior to commencement of construction activities under D&M Plan Phase III.

g. Consult with the DEEP Dam Safety Division regarding permitting requirements, if any, for the proposed stormwater basins prior to site construction;

SRL consultation with the DEEP Dam Safety Division indicated there would be no permitting requirements for the stormwater basins. The Council confirmed this condition was satisfied on October 18, 2023.

h. A Spill Prevention and Response Plan;

This information was provided in D&M Plan I. The Council’s decision on D&M Plan I included the following conditions pertaining to the Spill Prevention and Response Plan.

1. An updated Spill Prevention and Response Plan, which includes contact information for the SRL Field Operations personnel. SRL has provided this information.
2. Provide procedures for Fuel/Hazardous Materials Storage and Equipment Refueling during construction. SRL has provided this information.

An updated copy of SRL’s Spill Prevention, Control, and Countermeasure (“SPCC”) Plan, which includes an Oil Spill Contingency (“OSC”) Plan is attached as **Attachment 5**. Updates made to the SPCC Plan include Key Facility Personnel (page 6) and the site layout (page 10). Updates made to the OSC Plan include Appendix A, Appendix B, and Figure C-2.

An updated copy of SRL’s Petroleum and Hazardous Materials Storage, Refueling, and Spill Prevention Procedures (“Fuel Storage Plan”) is attached as **Attachment 6**. Updates made to the Fuel Storage Plan include the Site Contacts (page 2). Additionally, SRL no longer plans to store diesel fuel onsite and instead will be utilizing mobile refueling.

i. A livestock co-use plan for the site, including, but not limited to, provisions for rotational grazing, water access and emergency evacuation;

As part of D&M Plan II, SRL indicated it does not intend to host livestock grazing at the Site. Should SRL decide to allow livestock grazing, SRL will notify the Council and submit a co-use plan for Council review at that time.

j. Consult with the state and local fire marshals regarding compliance with the CT State Fire Prevention Code, Section 11.12.3 - Ground Mounted Photovoltaic System Installations prior to commencement of construction; and

As part of Partial D&M Plan II, SRL consulted with the Litchfield and Torrington Fire Marshals. The fire marshals for both municipalities did not comment on the clearance provision. The fire marshals both recommend that vegetation be cut to a height no greater than six inches within the array area.

k. Project construction hours/days of the week.

Between November 1 and March 31, SRL will conduct construction activities Monday through Saturday from 7:00 a.m. to 7:00 p.m. and between April 1 and October 31 such activities will occur Monday through Saturday from 7:00 am to 5:00 pm.

Consistent with the NDDDB recommended species protection measures listed in the DEEP NDDDB Determination letter dated April 28, 2022, SRL will not conduct tree clearing activities between March 30th and August 31st.

3. Council Partial D&M Plan II Approval Conditions (June 9, 2023)

- 1) **Confirmation that facility site plans showing the perimeter fence/solar array alignments were provided to the Fire Marshals of Litchfield and Torrington for comment in regards to locations where the site perimeter fence will be less than the 10-foot minimum clearance requirement from the end of the solar arrays, as set forth in 2018 CT State Fire Prevention Code, Section 11.12.3.1 (superseded by 2022 CT State Fire Prevention Code, Section 11.12 1.4 Clearances);**

SRL confirmed that the current Project design, as reflected in the Site Civil Design Plans, does not include a distance of less than 10 feet between the perimeter fence and solar arrays.

- 2) **Implementation of the recommended species protection measures listed in the DEEP NDDDB Determination letter dated April 28, 2022.**

As noted above, SRL will implement the recommended species protection measures listed in the DEEP NDDDB Determination letter dated April 28, 2022. These measures have been included in the Site Civil Design Plans on Sheet C003.

4. Council Partial Development and Management Plan-Phase I (January 18, 2022)

- 1) **Provide SRL Field Operations personnel contact information for the Spill Prevention and Response Plan;**

SRL has provided this information. *See* Council's June 9, 2023 correspondence.

- 2) **Provide procedures for Fuel/Hazardous Materials Storage and Equipment Refueling during construction; and**

SRL has provided this information. *See* Council's June 9, 2023 correspondence.

- 3) **Install two rows of ESC fencing/compost sox in area where the distance from a wetland to the LOD is less than 100 feet.**

The current Site Civil Design Plans require compliance with this condition. *See* Sheet C510, Erosion and Sediment Control Notes, note 21, which states "Install two rows of silt fencing/compost filter sock in areas where the distance from a wetland to the LOD is less than 100 ft". In addition, Sheets C501-C504 require a "Row of Compost Filter Sock and Silt Fence" in these locations.