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Via Hand Delivery and Electronic Mail (siting.council@ct.gov)

January 23, 2023

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

Re: **PETITION NO. 1443A - SR North Stonington, 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 9.9-megawatt AC solar photovoltaic electric generating facility on five parcels located north and south of Providence New London Turnpike (State Route 184), west of Boombridge Road and north of Interstate 95 in North Stonington, Connecticut, and associated electrical interconnection. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b)**

Phase II - Development and Management Plan Submission

Dear Attorney Bachman:

Enclosed please find an original and fifteen (15) copies of the following:

- Development and Management (“D&M”) Plan – Phase II narrative.
- Attachments:
 1. Final Site Plan (G-101). Also enclosed are three (3) full size (24” x 36”) sets of of this attachment.
 2. Final Vegetation Management Plan.

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Robinson+Cole

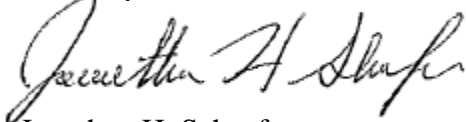
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3. Updated Site Civil Design Plan. Also enclosed are three (3) full size (24" x 36") sets of the Updated Site Civil Design Plan.
4. Eversource Interconnection Correspondence.
5. 476 Providence-New London Turnpike Visual Screening Plan.
6. Final Structural Design Plans. Also enclosed are three (3) full size (24" x 36") sets of this attachment.
7. Final Traffic Management Plan.
8. CTDOT Approval Letter.

Together, this information constitutes the Phase II - D&M Plan submission for the SR North Stonington, LLC approved solar photovoltaic electric generating facility.

We respectfully request that this information be reviewed, and this matter be placed on the next available Siting Council agenda for approval. Please feel free to contact me if you have any questions or require additional information.

Sincerely,



Jonathan H. Schaefer

Enclosures

Copy to (via email):

Robert A. Avena, Esq. (RAvena@sswbgg.com)

Bob Carlson, North Stonington First Selectman (rcarlson@northstoningtonct.gov)

Nathan Reichert, North Stonington Planning, Development & Zoning Official
(nreichert@northstoningtonct.gov)



Petition No. 1443A - SR North Stonington, LLC

PHASE II DEVELOPMENT AND MANAGEMENT PLAN

Introduction

SR North Stonington, LLC (“SRNS”) hereby submits its Development and Management Plan (the “Phase II D&M Plan”) for the SRNS solar facility in North Stonington, Connecticut (the “Project”). The Connecticut Siting Council (the “Council”) approved the Project by Decision and Order on May 13, 2022 (“Decision”) in Petition No. 1443A (“Petition”). The Council approved the Phase I D&M Plan (a/k/a Partial D&M Plan) on October 27, 2022, which was specific to tree clearing and associated activities that must be completed prior to April 30, 2023 in accordance with the Department of Energy and Environmental Protection (“DEEP”), Natural Diversity Data Base (“NDDB”) clearing restrictions associated with certain bat species. The tree clearing restriction applicable to the Project is from May 1st to August 14th. SRNS submitted a Notification of Commencement of Construction on November 2, 2022 and began tree clearing and associated site development activities consistent with the approved Phase I D&M Plan in December of 2022.

SRNS now submits its Phase II D&M Plan, which contains information and materials to satisfy the outstanding conditions of the Council’s Decision. SRNS also would like to clarify that, consistent with DEEP construction sequencing requirements, SRNS will first conduct tree clearing, grubbing and stump removal in those areas necessary to install perimeter soil erosion and sedimentation controls (“SESCs”) (*e.g.*, sedimentation basins and swales). Once these SESC are in place, SRNS will complete the remaining tree clearing.

The updated Site Civil Design plan (Revised December 14, 2022), enclosed as **Attachment 3**, sets forth these and other construction activities. Due to the nature of the Project, seasonal development restrictions imposed by the DEEP NDDB, and SRNS’s obligations under its Power Purchase Agreement, SRNS must now operate two construction crews simultaneously – one working on the Western Array and one working on the Eastern Array. Consistent with the DEEP-issued Stormwater Permit (“Stormwater Permit”) construction sequencing requirements mentioned above, each construction crew will first only conduct clearing, grubbing and stump removal (where necessary) to install perimeter SESC (*e.g.*, sedimentation basins and swales). This includes efforts necessary to construct and upgrade access roadways in order to access the array areas. Next, perimeter and other remaining SESC will be installed. SRNS’s Spill Prevention and Response Plan will continue to be implemented throughout construction activities.

Once the installation of the site access driveways and SESCOs is complete, the construction crews undertake the following activities:

- Completion of remaining clearing, grubbing, and stump removal required for the Project, as designated on the Tree Clearing Plan approved as part of the Phase I D&M Plan.
- Installation of the remaining SESCOs necessary to complete the preceding tasks in compliance with the Stormwater Permit.
- Implementation of NDDDB species protective measures consistent with SRNS's Resources Protection Measures Plan, as approved by a final NDDDB determination letter.
- Installation of security fencing and gates;
- Installation of internal access roadways, including the upgrading of the Eastern Array driveway off Boombridge Road.
- Site grading and fill within the Project area in preparation for construction and installation of the solar arrays.
- Installation of any remaining temporary and permeant stormwater controls in accordance with the Stormwater Permit for proposed stormwater basins.
- Complete overhead electrical intraconnection of the Western Array Area and the Eastern Array Area across Wetland E.
- Installation of all solar panels, framing, and racking;
- Installation of all electrical equipment associated with the solar arrays.
- Installation and connection of all electrical interconnection equipment.
- All final grading, fill, and stabilization activities.
- Installation of visual screening and aesthetic design features adjacent to properties at 454 and 476 Providence New London Turnpike.

SRNS hereby requests that the Council approve this D&M Plan as soon as possible to allow SRNS to continue construction efforts consistent with the Stormwater Permit.

Construction Schedule and Hours of Operation

Construction activities will occur Monday through Saturday from 7:00 a.m. to 5:00 p.m. during the fall/winter months, (November to March) and 7:00AM to 7:00PM during the spring/summer months, (April to October). SRNS will notify the Council prior to any changes to this schedule.

Management Contact Information

All site construction activities are managed by Joe Marrone who can be reached at (610) 506-6111. Miller Brothers will be the site contractor and will be involved in all Phase I and II activities. Miller Brother's Construction Manager throughout Phase I and II will be Peter LaCamera who can be reached at (610) 246-1267. Robert Goodgame is the SRNS's Project Manager overseeing Phase I and II and can be reached at (912) 509-4450.

Decision and Order Conditions

○ **Condition No. 1**

Submit a copy of a DEEP-issued Stormwater Permit prior to the commencement of construction activities that includes consultation with DEEP regarding the potential impacts of sheep grazing on the site, including, but not limited to, water quality impacts from animal waste.

SRNS submitted a copy of its Stormwater Permit in its October 19, 2022 responses to the Council's Phase I D&M Plan Interrogatories. SRNS consulted with the DEEP Stormwater Program regarding the potential for future sheep grazing at the site. No site layout modifications associated with stormwater design were identified. As noted below, sheep grazing would not begin until after the Project is operational and the Council has approved SRNS's sheep grazing plan.

○ **Condition No. 2**

- a. **A final site plan including, but not limited to, final facility layout, access roads, electrical interconnection including pole locations, fence design, equipment pads, stormwater management control structures, and final seed mix;**

A final Site Plan included as **Attachment 1**. A final Vegetative Management Plan is included as **Attachment 2**, which includes the final seed mix.

- b. **Final plans for intra-connection of the Western Array Area and the Eastern Array Area that crosses Wetland E;**

SRNS will intra-connect the Western Array Area and the Eastern Array Area with an overhead line that will cross Wetland E from poles located outside of the wetland limits, as depicted in the updated Site Civil Design plan (Revised December 14, 2022) is included as **Attachment 3**. The primary difference between the previously provided version of these plans are: (i) the display of the wooden fence along the property line with 476 Providence-New London Turnpike; and (ii) the adjustment of the construction entrance to the Western Array Area from Providence-New London Turnpike. Pursuant to DOT's request, this entrance was moved approximately thirty feet (30') to the east.

- c. **Consultation with Eversource to minimize the visibility of the electrical interconnection and submission of final design plans;**

A copy of correspondence between SRNS and Eversource regarding efforts to minimize the visibility of the electrical interconnection is included as **Attachment 4**. As noted in Eversource's response, the third clean pole will be eliminated, while all other features must remain as originally designed. The final interconnection layout is depicted on the final Site Plan included as **Attachment 1**.

- d. **Final plans for an aesthetic fence design for visual screening at 454 and 476 Providence New London Turnpike;**

Final plans for an aesthetic fence design for visual screening at 454 Providence New London Turnpike are included on the final Site Plan included as **Attachment 1**.

Final plans for an aesthetic fence design for visual screening at 476 Providence New London Turnpike are included as **Attachment 5**.

- e. **A final sheep grazing plan that does not include rotational grazing in proximity to any dog kennel(s);**

SRNS does not have plans to bring sheep to the Project at this time. However, the Town and SRNS are both interested in having sheep grazing at the Project after operation begins. SRNS will not bring sheep to the Project until it has notified the Council and received the Council's approval of its sheep grazing plan.

- f. **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 seeding/growing season details prior to the installation of the post driving/racking system, 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;**

An updated Site Civil Design plan (Revised December 14, 2022) is included as **Attachment 3**. SRNS will install all of its E&S controls for the Project in accordance with the *2002 Connecticut Guidelines for Erosion and Sedimentation Control* and the Stormwater Permit, as described above.

- g. **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 seeding/growing season details, soil stockpile locations, and a Spill Prevention, Control, and Countermeasure Plan that is protective of groundwater resources;**

An updated Site Civil Design plan (Revised December 14, 2022) is included as **Attachment 3**. A Spill Prevention, Control, and Countermeasure Plan that is protective of groundwater resources was provided and approved in the Phase I D&M Plan.

- h. Final structural design for the solar module racking system stamped by a Professional Engineer duly licensed in the State of Connecticut; and**

The final structural design for the solar module racking system, stamped by a Professional Engineer duly licensed in the State of Connecticut, is included as **Attachment 6**.

- i. Construction traffic control plan developed in consultation with the Town and State Department of Transportation, as applicable.**

A Traffic Management Plan is included as **Attachment 7**. This plan was developed in consultation with the Town and approved by the DOT. The DOT's approval is included as **Attachment 8**.