

KENNETH C. BALDWIN

280 Trumbull Street
Hartford, CT 06103-3597
Main (860) 275-8200
Fax (860) 275-8299
kbaldwin@rc.com
Direct (860) 275-8345

Also admitted in Massachusetts

March 17, 2023

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
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**

Request for Staff Approval of Temporary Modification to Culvert C-3 Crossing

Dear Attorney Bachman:

On behalf of SR North Stonington, LLC (the “Petitioner”), I am requesting Staff approval of a temporary modification to the new access road crossing of Wetland B/1B in the eastern array of the SR North Stonington solar facility. To accommodate this new wetland crossing, the Petitioner proposed, and the Council approved the installation of a nine-foot open-bottom arch culvert (Culvert C-3) at this location.

Due to procurement related delays, the Petitioner recently learned that the delivery of the arch culvert was going to be delayed for approximately 8-10 weeks. To maintain its construction schedule, the Petitioner is proposing the installation of a temporary Wetland B/1B crossing to access the easterly array of the SR North Stonington solar facility. The temporary crossing will involve the installation of two 30-inch (minimum)¹ reinforced concrete pipes in place of the nine-foot arch culvert.

Attached to this letter is a Temporary Culvert Exhibit from the project engineers HDR showing the temporary culvert installation plans. The proposed temporary culvert installation was also analyzed by Dean Gustafson at All Points Technology Corporation (“APT”). According to Mr. Gustafson the limits of disturbance necessary for the installation of the

¹ Larger culverts may be used if 30-inch pipes are not available.

Robinson+Cole

Melanie A. Bachman
March 17, 2023
Page 2

temporary culvert crossing will not exceed the previous approved limits of disturbance including disturbance of the associated Wetland Area B/1B. In addition, the proposed temporary crossing will remain compliant with U.S. Army Corps of Engineers Stream Crossing Best Management Practices. A copy of the APT Temporary Culvert C-3 Analysis is also attached for your review.

The Petitioner will install the arch culvert in accordance with the Council's approval as soon as it is delivered to the project site and will notify Staff when the arch culvert installation has been completed.

Thank you in advance for your assistance and cooperation.

Sincerely,

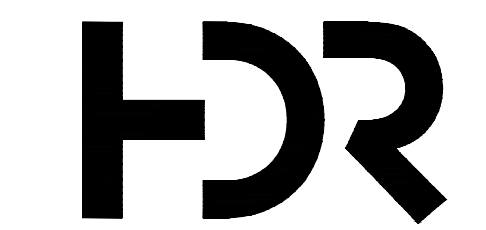
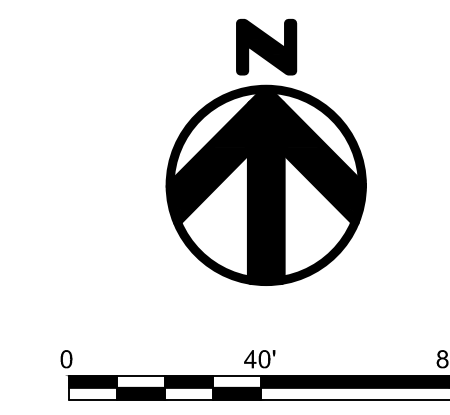


Kenneth C. Baldwin

KCB/kia

Copy to:

Bob Carlson, First Selectman
Robert Goodgame, SR North Stonington
Dean Gustafson, All Points Technologies, P.C.
Matthew Gustafson, All Points Technologies, P.C.

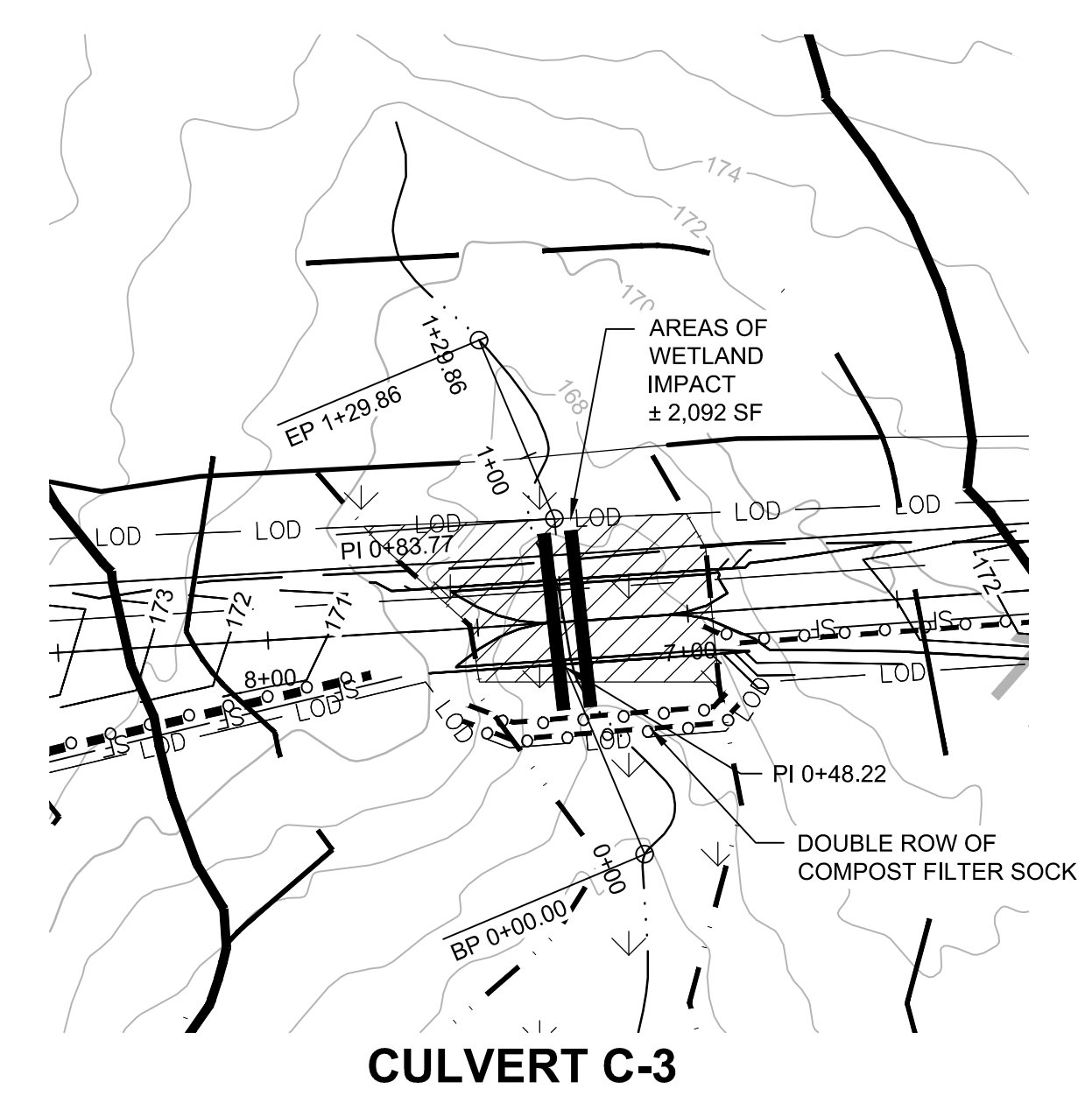


NOT FOR
CONSTRUCTION

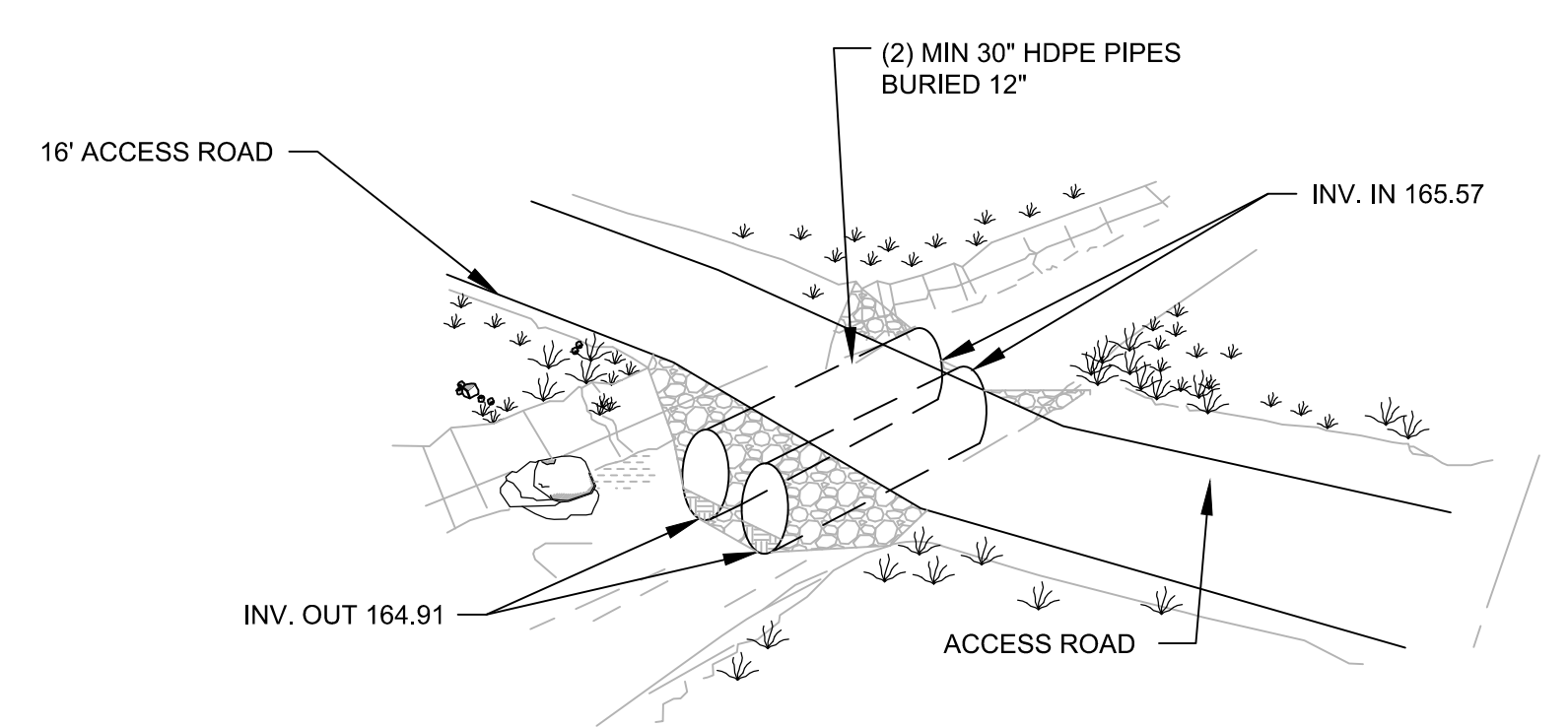
**NORTH
STONINGTON
SOLAR**

428, PROVIDENCE-NEW LONDON TURNPIKE
NORTH STONINGTON, CT 06359, USA
LAT: 41.431830°N
LON: 71.821514°W

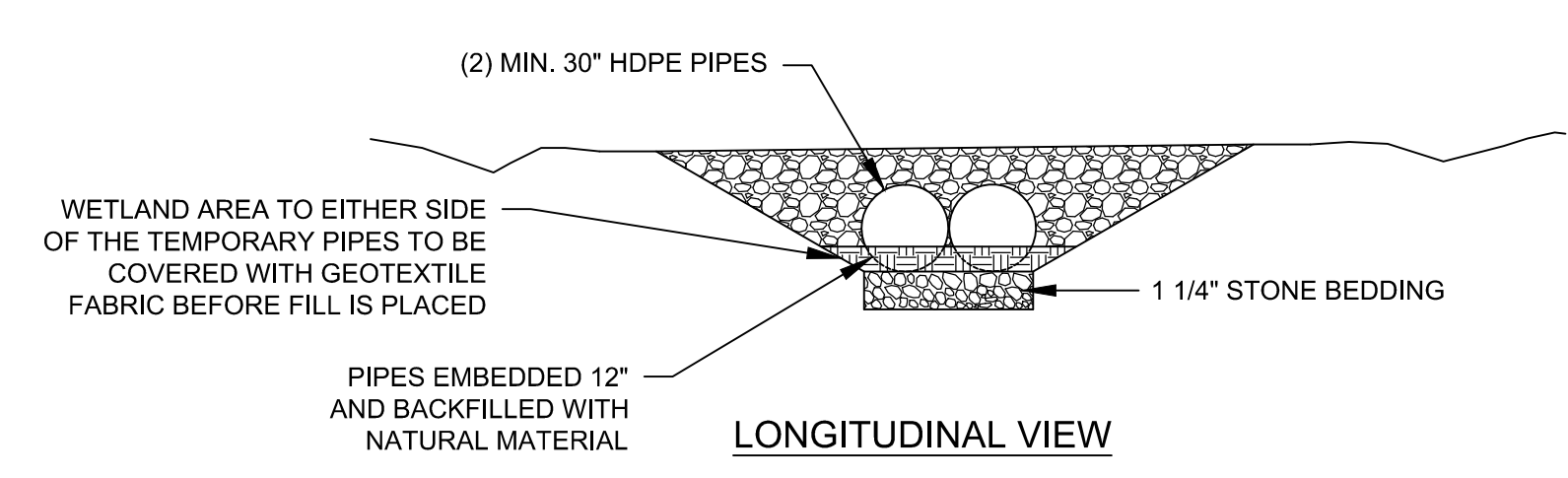
NORTH STONINGTON, CT



CULVERT C-3

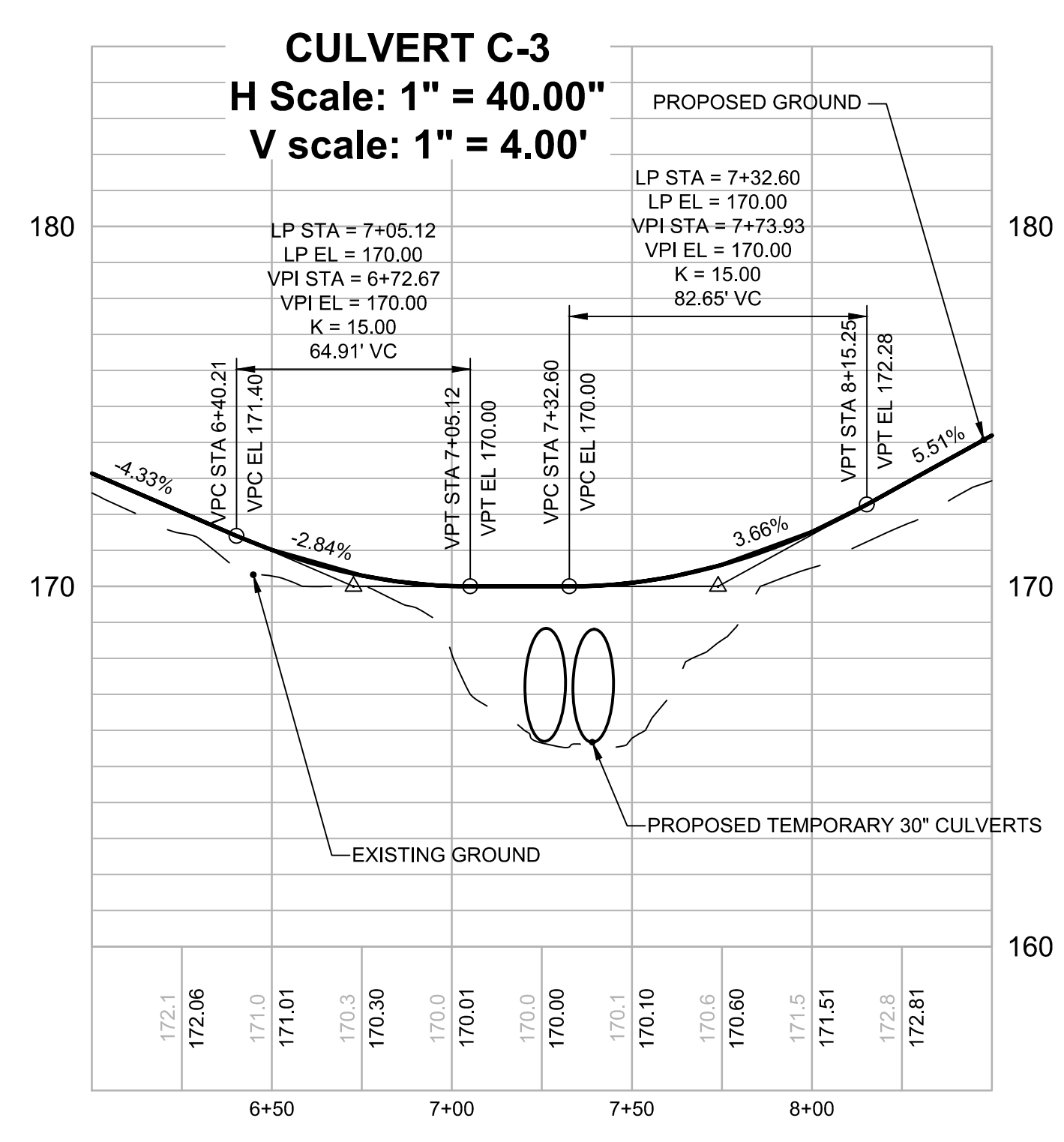


PERSPECTIVE VIEW



LONGITUDINAL VIEW

TEMPORARY WETLAND CROSSING DETAIL
NOT TO SCALE



REV. NO	DESCRIPTION	DATE
1	REQUEST FOR INFORMATION	03/16/23

SHEET TITLE:
TEMPORARY CULVERT

PROJ. MGR. CM	PROJ. ENGR. MB	DATE: 03/16/23
DRAWN BY: JP	CHECKED BY: CP	SCALE: 1"=40'

DRAWING NO.

EXHIBIT



Temporary Culvert C-3 Analysis

March 16, 2023

Mr. Robert Goodgame, Project Manager
Silicon Ranch Corporation
222 Second Ave S., Suite 1900
Nashville, TN 37201

Re: Stonington Solar
428 Providence-New London Turnpike, North Stonington, Connecticut
APT Project No. 670110

On behalf of SR North Stonington, LLC, All-Points Technology Corporation, P.C. ("APT") performed an evaluation of a minor modification to proposed Culvert C-3, which crosses over Wetland B/B1. APT is aware that due to procurement-related delays in obtaining the 9-foot wide open-bottom arch culvert at C-3, there is a need to install a temporary crossing in order to access the eastern array from Boombridge Road and maintain the project's construction schedule.

APT has reviewed Temporary Culvert Exhibit, prepared by HDR Engineering, Inc. ("HDR") dated March 16, 2023, which depicts the 9-foot wide open bottom arch culvert temporarily replaced by two 30-inch HDPE pipes¹. The limits of disturbance for the temporary Culvert C-3 crossing does not exceed the previously approved limits of disturbance or the associated area of Wetland B/B1 impact at 2,092 square feet. Similar to the previously approved crossing structure, the proposed temporary crossing would remain compliant with the U.S. Army Corps of Engineers Stream Crossing Best Management Practices ("BMPs"; Appendix G, dated August 2016) which generally includes that culvert pipes embedded 12 inches below the existing wetland surface elevation and backfilled with suitable native wetland soil/stream material. These BMPs will provide similar function to the permanent arch culvert by allowing for unrestricted aquatic organism/wildlife movement and unimpeded hydraulic flows within the wetland both upstream and downstream of the crossing. In addition, wetland soils beyond the limits of the proposed culverts will be protected with geotextile fabric prior to placement of temporary fill material to facilitate restoration when the permanent arch culvert is installed; these soils will be exposed when the 9-foot wide arch culvert is installed since the twin culverts cover a narrower area. Compliant with the approved Resource Protection Plan notes detailed on Sheet C003 of the approved D&M Plan, all work associated with installation of the temporary C-3 culverts and Wetland B/B1 crossing will be monitored by APT's Environmental Compliance Monitor. It is APT's understanding that this temporary crossing structure will remain in place for no more than twelve (12) weeks and will be replaced with the original arch culvert structure.

¹ 30-inch culverts are minimum size; larger culverts may be used depending on availability

Based on APT's assessment of the revised Culvert C-3 temporary crossing, all elements of the U.S. Army Corps of Engineers Stream Crossing Best Management Practices and Resource Protection Plan will be complied with. Considering the short duration during which the temporary crossing will remain in place and the BMPs and protection measures that will be implemented, the temporary crossing in our opinion does not substantially deviate from the function of the permanent arch culvert and will not result in a likely adverse impact to Wetland B/B1.

Sincerely,
All-Points Technology Corporation, P.C.



Dean Gustafson
Senior Wetland Scientist