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May 7, 2024

DELIVERED BY E-MAIL AND HAND DELIVERY

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

Re: PETITION NO. 1609 – TRITEC Americas, LLC notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes §16-50k(e), and petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 0.999-megawatt AC solar photovoltaic electric generating facility located at 250 Carter Street, Manchester, Connecticut, and associated electrical interconnection. **Petitioner Responses to Interrogatories from the Town of Manchester.**

Dear Attorney Bachman:

On behalf of TRITEC Americas, LLC ("Petitioner"), please accept the enclosed responses to the interrogatories provided by the Town of Manchester on April 18, 2024. The Petitioner submits fifteen hard copies of all necessary documents. Please feel free to contact me if you have any questions.

Very sincerely yours,

Paul R. Michaud

Paul R. Michaud

cc: Service List dated April 30, 2024
John F. Sullivan, Attorney for the Town of Manchester
Raymond Welnicki
Rachel and Dana Schnabel
Rosemary Carroll (MARSD)

Petition No. 1609 TRITEC Americas, LLC
250 Carter Street, Manchester, Connecticut

Interrogatories April 18, 2024

1. Has the site been assessed for the presence of vernal pools? If so, what were the findings?

   Response:

   During site investigations on July 26 and 27, 2023, all wetlands and watercourses at the subject 41-acre property (including the site) were identified, field delineated, and assessed by WKA, with additional fieldwork to compile USACE Wetland Determination Data Forms for the wetland and watercourse proposed to be impacted. USACE related fieldwork was carried out on September 19, 2023. During the two initial site visits, the property was assessed for the presence of potential vernal pools and/or potential cryptic vernal pools. No topographic, geomorphic, or hydrologic conditions that would support the breeding and development of vernal pool species were found. Based on this, it is Petitioner's conclusion that no seasonal or cryptic vernal pool areas are present at the property.

2. With several forest seeps identified on the site, has the depth to groundwater been identified, and have the hydrological impacts of deforestation on these seeps been studied? If so, what were the findings?

   Response:

   The unconfined, regional, and perennial groundwater at the proposed Project Site is well below the project construction activities and, as such, this groundwater will not be affected by them or the Project. Some of the shallow, perched, and intermittent ground water at the property will be managed by the Project's stormwater management system. This shallow, perched, and intermittent groundwater is present due to the onsite soils and glacial till deposits that include a relatively impervious hardpan that begins two to three feet below the ground surface. Intermittent shallow subsurface groundwater flows, primarily driven by seasonal and precipitation events, move atop the hardpan and are the primary reason for the onsite seepage areas. The proposed Project will allow existing east to west flows of perched, intermittent, shallow subsurface ground water to continue through the proposed field before being captured by the proposed drainage swale. The drainage swale will convey this water to a proposed basin where it will be discharged to the west. Perched, intermittent, shallow subsurface groundwater flows west of the project site will be reduced in the south and increased in the north. The proposed Project's stormwater management system was designed to account for the slight increase in runoff that stems from the conversion of forest to grassland.

3. Has there been an impact analysis of the habitat requirements of local wildlife with consideration to the removal of a portion of core forest? If so, what were the findings?

   Response:

   Petitioner assessed the impacts of the proposed project on local wildlife species. The results of this assessment are provided in sections 3.4 and 3.5 of the previously submitted Environmental Assessment (Exhibit G). In summary, the potential impacts to local wildlife from forest removal will primarily stem from the initial disturbance at the start of construction and the ultimate change in vegetation after the project's completion. Any wildlife disturbed or displaced during the short construction period (approximately 4-8 months), are expected to naturally move to adjacent forest habitats, such as the remaining forest area on the property or the 2,500 acres of forest to the southwest of the project site. Changes in vegetation will primarily result in alterations to canopy coverage and available areas of browse / forage. The current core forest onsite is an approximate 13.5-acre small core forest. The CT DEEP regards small core forests as less ecologically important than medium or large core forests[1] as, "250 acres should be considered the absolute minimum forest patch size needed to support area-sensitive edge-intolerant species"[2] . Although small core forests are smaller than these habitat-based guidelines, these areas are still mapped as they are "still valuable from forestry and other perspectives"[2]. Ultimately, the proposed conversion of this small core forest will create a wildlife friendly fenced grassland that will provide protection for small prey species, provide grazing opportunities for a multitude of species and provide areas for ground and shrub nesting avian species. Only the largest of Connecticut's and Manchester's wildlife species will be excluded from the small area but will have access to the nearby 2,000+ acres of forested habitat.

4. Have acoustic detection surveys been conducted to identify the species of bats that are present on site? If so, what were the findings?

   Response:

   Acoustic detection surveys for bat species have not been undertaken. No state-listed bat species were identified by the CT DEEP as having the potential to be present on the subject parcel (as per the NDDB Assessment Letter). Additionally, according to the CT DEEP, no known hibernacula of federally listed bat species (specifically northern long-eared bat), are present within the Town of Manchester. The nearest known hibernacula of northern long-eared bats is located in East Granby, approximately 16 miles northwest of the site. The nearest known summer roost site

[1] CT DEEP 2020 Forest Action Plan; https://portal.ct.gov/-/media/deep/forestry/2020-approved-ct-forest-action-plan.pdf

[2] UCONN Center for Land Use Education and Research, Core Forest Explained; https://media.clear.uconn.edu/projects/landscape/v2/forestfrag/measuring/core_explained.htm

is located in Salem, approximately 17.5 miles to the southeast of the site. As such, acoustic detection surveys for bat species were not carried out.

5. Has there been consultation with the Connecticut Forest and Parks association to confirm that the project will not have an adverse impact on the current viewshed from the Shenipsit Trail? If so, what were the results of that consultation?

   Response:

   At this point, there has been no consultation with the Connecticut Forest and Parks association to discuss or confirm potential impacts the project may have on the Shenipsit Trail viewshed.

6. With the understanding that vegetative uptake will be reduced, has the increased groundwater discharge from the site been considered regarding required volumes of the detention basin and regarding downslope impacts to wetlands and neighboring properties? If so, what were the findings?

   Response:

   The stormwater model accounts for the change in ground cover from the existing wooded condition to a proposed meadow-type ground cover. As noted in the above Interrogatory Response No. 2 it has been determined that the proposed Project will have a negligible impact to the groundwater. The proposed stormwater management model and basin has been designed per CT DEEP standards and shows that the peak discharge rates from the proposed Project will be reduced by over 50% for the 2, 5, 10, 25, 50 and 100-year storm events analyzed.

7. Will the perimeter fence be constructed in a way that it will not impede the overland migration and habitation of local wildlife? If so, please describe said construction.

   Response:

   The proposed perimeter fence will be constructed in such a way as to not impede the overland migration and habitation for the majority of wildlife, save for large mammals. The fence is designed with a "wildlife-friendly" six-inch gap at its base for terrestrial wildlife to pass under. Large mammals that are unable to fit through this gap will simply travel around the fenced area, which will not significantly impact their migration corridors as forested lands will border the project area. Large mammals will be excluded from utilizing the habitat within the fence line, but this nuisance for them will result in a protected grassland for small prey species, inaccessible by large predatory mammals.

8. In an effort to meet the requirement of restoring the site to "pre-existing conditions", has there been a complete and thorough inventory of all existing

conditions (including but not limited to: vegetation, wetland extents, topography, rock outcrops, soil aeration, groundwater flow patterns, depth and location of organic deposits in the soils, wildlife cover elements such as duff, soft snags, hard snags, etc.)? If so, what were the findings of said inventory?

Response:

The previously submitted Environmental Assessment (Exhibit G), includes a complete and thorough inventory of all environmental conditions onsite.