Petition by C-TEC Solar, LLC for a Declaratory Ruling, Pursuant to Connecticut General Statutes § 4-176 and § 16-50k, for the Proposed Construction, Operation and Maintenance of a 2.95 MW AC Ground-mounted Solar Photovoltaic Electric Facility Located at 77 Pompeo Road, Thompson, Connecticut

Prepared for:
The Connecticut Siting Council

September 30, 2024

LIST OF FIGURES:

LIST OF APPENDICES:

1.0 Introduction

This is a Petition for a Declaratory Ruling, pursuant to Connecticut General Statutes §§ 4-176 and 16-50k, that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required for the development, construction, operation and maintenance of a proposed solar photovoltaic project (the "Project") proposed by C-TEC Solar, LLC ("C-TEC" or "Petitioner") in the Town of Thompson, Connecticut. The Project consists of the development of a 2.95-megawatt ("MW") alternating current ("AC") ground-mounted solar photovoltaic ("PV") system ("Facility") located at Pompeo Road, Thompson, Connecticut ("Property"). See Figure 1 – Site Location Map and Figure 2 – Proposed Project Areas Aerial.

The 2.95-megawatt solar array will receive renewable energy credits ("RECs") under the Connecticut Non-Residential Renewable Energy Solutions Program, and the array has been designated as LZ2-ESNRES-00539. The Tariff Terms Agreement Approval Date or In-Service Date for this portion of the Project is November 27, 2026.

Authorization by the Connecticut Siting Council ("Council") via approval of this Petition would allow the Petitioner to construct the Project and assist the State of Connecticut in achieving its goal of energy conservation and sustainability. Pending approvals, the Project will commence financing, detailed engineering, procurement, and construction efforts in 2025, with commercial operation planned for the entire Project in 2025.

The Project is located on one parcel within the Town of Thompson Rural Residential Agricultural zoning district and is comprised of approximately 16 acres on a 164-acre parcel. See Figure 3 – Zoning Map. The Town of Thompson's Assessor's Office has the parcel listed as Account Number 2031, M/B/L 81-48-17 and the parcel is currently owned by Jeffrey S & Cheryl L Pompeo. See Figure 4 – Tax Parcel Map and Figure 5 – Existing Conditions Map.

2.0 Petitioner

C-TEC Solar is a limited liability company with offices at 1 Griffin Road South, Bloomfield, CT 06002. C-TEC is a fully integrated development platform that develops, designs, constructs, owns, operates, and maintains clean, renewable-energy projects throughout the United States. C-TEC offers integrated solar solutions to commercial and industrial ("C&I"), municipal, and utility customers. From beginning to end – origination through construction and then lifetime operation – customers work with a single delivery team. C-TEC focuses on delivering clean energy, peak performance, and maximum energy savings. Since 2011, C-TEC has constructed and is operating over 310 MW of C&I solar projects throughout the country. The power generated by the portfolio is sold under long-term contracts that are typically 20 years, and the majority of the buyers have investment-grade credit ratings.

C-TEC has developed, owns and operates large-scale ground-mount projects in Connecticut and has several other projects under construction in Connecticut. C-TEC is also regarded as a leader in Solar-Plus-Storage, currently developing several battery-powered projects in the states of Connecticut and Massachusetts, while also being awarded one of the first Solar Massachusetts Renewable Target Program ("SMART") projects in the Commonwealth of Massachusetts. C-Tec's commercial clients include the City of Hartford, the City of New Britain and various other property owners throughout Connecticut.

As a vertically integrated solar development company, C-TEC manages every step of the solar development and implementation process. From project origination to design and engineering to construction and, ultimately, operation and maintenance, C-TEC brings its years of industry knowledge and expertise at every level. Moreover, with hands-on management of on-site performance and sophisticated reporting processes in place, both during construction and operation and maintenance, C-Tec is able to ensure safety, quality control and optimal electrical generation throughout the life of each project.

Correspondence and communications regarding this Petition should be addressed to the following individuals:

Michael Morrison
C-Tec Solar, LLC
1 Griffin Road South, Suite 200
Bloomfield, CT 06002
michael.morrison@ctecsolar.com
(860) 580-7174 ext. 121

Lee D. Hoffman
Liana Feinn
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103
lhoffman@pullcom.com
lfeinn@pullcom.com
860-424-4300

All individuals consent to electronic mailings of all Council and Petition-related correspondence.

3.0 Proposed Project

3.1 Project Area Overview

The Project site consists of approximately 16 acres located on a larger, 164-acre parcel at 77 Pompeo Road, Thompson, Connecticut ("Project Area"). The Town of Thompson's Assessor Office has the parcel listed as M/B/L 81-48-17, and it is currently owned by Jeffrey S and Cheryl L Pompeo. See Figure 4 – Tax Parcel Map. The parcel was woodland until the area was timber harvested within the past 3 years and has not been developed by the landowners. The proposed Project would allow the landowners to establish permanent turf-forming vegetation to the site.

Jeffrey Pompeo purchased the Property in 1989 and added Cheryl's name to the Property in 2009. Imagery suggests that the Project Area has never been cleared or developed prior to recent history. Jeffrey and Cheryl Pompeo are currently retired and are seeking a steady source of retirement income from their property. The Pompeos considered other potential uses of the Property such as developments for housing, but wanted to preserve the land for future family use. Their son plans to build a single-family residence on the Property in the future. As they sought to supplement their income, they found that the most appealing option would come in the form of converting a portion of their Property to allow solar panels to be placed on the Property. Developing a solar facility on the site would the Pompeos to retain ownership of the Property while generating a supplemental source of income through a lease agreement with C-TEC.

3.1.1 Existing Site Land Use

The overall land use of the 164-acre parcel/Property consists of a large, wooded area, a cleared grass field with scattered trees and a barn. There are delineated wetland areas to the north and south of the Project Area. See Figure 5 – Existing Conditions Map.

According to the Town of Thompson's Zoning Map, the principal use of the parcel is designated for residential and is located in the rural residential zone. There is a single dwelling on the Property that will not be impacted by the development. Access to the Property is proposed to be the southern driveway from Pompeo Road used by the landowners, which would be improved for site traffic

uses. All construction, maintenance, and all other activities related to the Project Area will use this access road. The Rural Residential Zone of Thompson is characterized by agricultural uses, and low-density housing. The zone allows for certain uses to be permitted via a special permit. Some of the uses requiring a special permit are golf courses, campgrounds, carnivals, convalescent homes, and farm stands.

3.1.2 Surrounding Land Use

The character and quality of Thompson is defined by its abundant agriculture and several brooks and ponds. This area of Thompson just northeast of the center of Town is situated between Pompeo Road to the west and forestland and Stoud Brook further to the east. A single residence to the south exists adjacent to the Project Area. To the north of the Project Area is the dwelling that is part of the property located at 77 Pompeo Road.

3.1.3 Project Area Alternatives

The Project Area was selected by C-TEC because it was suitable for a solar PV project and would have minimal natural resource and environmental impacts. The Project as designed will not have adverse effects on quality forested areas, agricultural land, or the designated wetlands, and the Project will not diminish the quality of life of those who live in the vicinity. It was also important to C-TEC to select a site that allows interconnection of the generation facility to a feeder and substation of the utility company that is compatible with its grid and goal of better serving customers. The proposed Project Area allows for interconnection to the Eversource distribution grid at a cost that is viable and avoids long term studies or any negative impacts to the electrical grid. Every attempt has been made to minimize adverse effects of development on the land.

3.2 Project Description

3.2.1 Site Access

The primary access point to the Project will be via an improved gravel access road located in the southwest corner of the parcel where the woodland has been previously cleared. Petitioner would construct an approximately 450 linear foot internal gravel roadway within the Project Area to provide widespread access to the proposed solar array, electrical equipment, and stormwater detention basins. Petitioner proposes the construction of the roadway on prepared subgrades with a gravel topping which would match existing grades to the greatest extent feasible. See Figure 6 – Proposed Project Layout and Appendix A – Sheet C-2.0 Layout and Materials Plan.

3.2.2 Solar Facility Design and Layout

It is currently anticipated that the Project will consist of photovoltaic (PV) arrays to be comprised of 590-watt panels (depending on the state of module technology at the time of construction) arranged two-high in portrait set at a 20-degree angle to balance the solar yield, located in the best available area within the Property, while avoiding the region closest to the neighbors in order to minimize their view of the Project, as well as avoiding wetland buffers and culturally significant areas. At the same time, the proposed design will balance maximizing annual energy production with limiting adverse impacts by using environmentally responsible design. The panels will be mounted on steel racking with driven posts to a depth to attain sufficient structural capacity to resist the loads from the weight of the panels, as well as environmental loads including snow, wind, and seismic forces.

The proposed PV array on the electrical site plan has a nameplate capacity of 2.95 MW AC and is designed with approximately 6,884 modules. There would be 22, 125 kW inverters and 2, 100kW inverters that are to be located throughout the array. The DC capacity is approximately 4.06 MW and the AC capacity is approximately 2.95 MW. The DC to AC ratio is designed as 1.35. The power from the inverters would be directed to a transformer, meter, disconnects and switchgear

prior to interconnecting with the utility distribution feeder. The power will interconnect to an existing pole on Pompeo Road.

3.2.3 Electrical Interconnection

The interconnection application for the solar array was submitted to Eversource Energy on June 17, 2019. The Project is proposed to interconnect with the 23Q Thompson Substation located via a 23kV feeder and is approximately 2.03 miles from the Project. The point of interconnection will be at a pole to the south of the access road at Pompeo Road.

In 2023, Eversource conducted an Impact Study and Eversource concluded that "The project did not cause any adverse impacts to voltage, power quality, or thermal limits whilst operating under a standard Volt/VAR curve. This project will be able to interconnect to the Eversource grid as proposed after all requirements spelled out in the system upgrades and services section above are completed." Petitioner executed an Interconnection Agreement with Eversource in the first quarter of 2024.

3.2.4 Fencing and Site Security

Petitioner proposes a 7-foot-high chain link fence to be installed around the perimeter of the solar array fields to provide site security, as well as to address National Electric Code requirements. The perimeter fencing would extend around each array. There would be three access gates, with locking hardware, proposed along the perimeter for access to the array and permanent stormwater basins. *See,* Appendix A – Sheet C-2.0- Layout and Materials Plan.

3.3 Stormwater Management

Under existing conditions, the Project Area is divided into five (5) subwatersheds that direct overland flow from stormwater off the site. Two (2) design points have been selected where stormwater enters one of the two wetland systems on the outside of the development area. The installation of five (5) permanent stormwater basins is proposed as part of the Project to capture,

retain, and infiltrate tributary Project runoff before it is released into surrounding wetlands and watercourses.

3.4 Construction Schedule and Phasing of Construction

Project construction is anticipated to begin in Spring/Summer 2025 pending regulatory approvals. Initial work would involve the installation of erosion and sediment control measures, including installation of sediment traps and the stormwater basin. It is currently anticipated that a temporary staging area would be located in the field north of the Project, pending future selection and consultation with an engineering, procurement and construction (EPC) contractor.

Formal construction notice to proceed would be anticipated in Spring/Summer 2025, with delivery of equipment likely commencing in Summer 2025. As each discrete area of installation is completed, the ground surface would be stabilized, although best management practices will remain in place until final stabilization occurs.

Final installation of array equipment and landscaping/screening measures would be anticipated in Fall of 2025. Final site stabilization, testing, and commissioning would be expected to be completed in the late Fall of 2025. Construction activities would be expected to occur Monday through Friday between the hours of 7:00 a.m. and 5:00 p.m. Notice will be provided to the Council in the event that Saturday work is planned.

The construction sequence for the Project begins by defining a weekly qualified inspector, emergency contact, and tentative schedule of all inspections, as well as holding a pre-construction meeting with representation from the general contractor, site contractor, Connecticut Department of Energy and Environmental Protection ("CTDEEP"), Conservation District, Town of Thompson, the engineer of record, and the qualified inspector. The contractor will contact Call-Before-You-Dig and notify the Town of Thompson at least 48 hours prior to commencement of any construction activity. Upon achieving completion of construction and final site stabilization, the engineer of record would investigate the Project Area and all temporary erosion controls shall be removed.

Prior to construction, a health and safety plan would be finalized by the contractor and would address not only the specific characteristics of the Project Area and the Project, but also will reflect the nature of the surrounding land uses. A Storm Water Pollution Control Plan ("SWPCP") would also be developed and implemented by the Project civil engineer that will include regular inspection of erosion control measures to prevent sedimentation or water quality impact. The Stormwater Management Report (Appendix E) provides Erosion and Sedimentation Control Best Management Practices – Maintenance/Evaluation Checklists for Construction Practices and Long-Term Practices. Construction sequencing is described in detail on sheet C-4.0 in Appendix A.

3.5 Operation and Maintenance

C-TEC has a dedicated O&M team that currently monitors and maintains all operational assets in the C-TEC portfolio. This team would manage the efficient operation of the Project after it is turned on and the construction is complete. A team of individuals including system analysts and field operators would monitor the system 24 hours a day, 7 days a week. The operation center utilizes Also Energy's platform for site monitoring and generation reporting, along with a custom-built in-house platform designed for improved site analytics. Custom alarm management provides instantaneous notifications. System performance analytics would be completed weekly to better understand the health of each asset and find trends in under producing systems. *See*, Appendix C – Operations & Maintenance Plan.

3.6 Decommissioning

At the end of the Project's life, decommissioning would include disassembly and removal of above-ground structures, removal of subsurface structures, and re-grading and restoration of disturbed areas. Where reasonably required, restoration would include regrading, seeding, and mulching to establish vegetation and prevent soil loss and erosion.

Racking posts pulled from the ground are expected to create minimal ground disturbance. Any disturbed areas will be seeded with the same seed mix used across the Project Area during the life of the Project or, if the landowner prefers, another acceptable mix would be selected.

At the time of decommissioning, the landowner may desire to continue the beneficial use of any components to be left on site, such as gravel roads, landscaping and/or visual screening and stormwater buffers. C-Tec will leave it to the landowner to secure necessary approvals for any such continued beneficial use, if such approvals are required.

Under the proposed decommissioning plan, Petitioner would be responsible for all decommissioning costs. Any additional permits or approvals required for decommissioning, removal, and legal disposal of Project components would be obtained before decommissioning activities begin. All activities would be conducted in accordance with all permits and applicable rules and regulations. Disposal of all solid and hazardous waste would be conducted in accordance with local, state, and federal waste disposal regulations.

4.0 Project Benefits and Needs

Connecticut has committed to develop its renewable energy market and mitigate the negative environmental impacts associated with traditional electric power generation. In so doing, it has set aggressive targets to reduce greenhouse gas ("GHG") emissions and to increase the deployment of Class I renewable energy. As such, the State has set a Renewable Portfolio Standard target to achieve 40% Class I renewable energy by 2030 and a 100% zero carbon target for the State's energy sector by 2040. The Project would provide a renewable energy source to be connected to Eversource's grid for additional zero carbon electric generating capacity.

The proposed Project will help Connecticut achieve these goals and will provide economic and social benefits to the State and the Town of Thompson in the form of lower electricity costs, greater grid stability, and the creation of construction jobs. Other benefits include:

- Once operational, the Project will generate renewable energy and offset tons of carbon dioxide emissions per year;

- Reduction in energy demand during peak usage will decrease energy costs for ratepayers throughout Connecticut;
- The creation of construction jobs in the region; and
- The Project will increase annual municipal tax revenues for Thompson with no additional burden on Town services.

5.0 Public Outreach

C-TEC has been in communication with and has engaged state and local regulators regarding the design and development of the Project.

On April 5, 2021, Petitioner received a letter from CTDEEP stating that the Project would not materially affect core forest. A copy of this correspondence is included with this Petition as Appendix K.

On March 13, 2024, Petitioner received final determination from the CTDEEP Bureau of Natural Resources Wildlife Division that the Project is not located on land that is known to have extant populations of Federal or State Endangered, Threatened, or Special Concern Species. A copy of the Final Determination is available in Appendix H.

On September 6, 2024, Petitioner received a letter from the Department of Agriculture stating that the Project would not materially affect prime farmland. A copy of this correspondence is included as Appendix L.

On September 26, 2024, Petitioner sent notice to all abutters and relevant governmental officials, pursuant to the Council's regulations. A copy of the table showing that outreach is included as Appendix M.

6.0 Potential Environmental Effects/Inputs

6.1 Site/Community Setting & Scenic Character & Values

The Project Area consists of approximately 16 acres and is located on Pompeo Road just past the intersection with Buckley Hill Road. The Project Area is an undeveloped parcel that has been untouched woodland throughout history. The Pompeo's acquired this Property in 2009 and it has never been actively farmed. The parcel has been wooded, and more recently, the new landowners have cleared the land of their own accord. The Project Area will be seeded with a vegetation mixture that promotes natural growth and establishment of pollinators.

6.2 Public Health and Safety

The proposed Project is not expected to create any adverse impact with regard to public health or safety issues. The proposed Project will meet or exceed all local, state, national and industry health and safety standards and requirements. During construction and post-construction operations and maintenance, workers and personnel would follow all health and safety standards applicable to solar energy generating facilities.

A site-specific construction health and safety plan is typically developed prior to initiation of any on-site Project-related tasks. During the construction phase of development, all contractors, sub-contractors and personnel will be appropriately trained and briefed on any potential site health and safety issues. There will be a designated construction manager and/or site safety officer or representative present at all times during construction, and such individuals will be responsible for overseeing/implementing the site construction health and safety plan.

Construction traffic relative to the site includes standard construction trucks, small earth moving equipment, and all-terrain forklift equipment. Vehicle trips would be relative to scheduled deliveries of the major materials such as solar racking, solar panels, electrical equipment to serve the solar site, and fencing materials to be installed around the perimeter of the solar field. Construction activity and associated traffic would generally take place from 7:00 AM to 5:00 PM

daily Monday through Fridays. Notice will be provided to the Council in the event that Saturday work is planned.

Potential pollutants that might be used on the site would include polyvinyl chloride ("PVC") glue for use with electrical conduit installations and carbon-based fuels for vehicles and equipment. Petitioner anticipates that there will be less than one gallon of PVC glues and less than 25 gallons of fuel stored on-site. Petitioner would keep all flammable liquids in code compliant cabinets and containers. Petitioner would also keep spill kits in all vehicles and equipment on-site. Petitioner would monitor chemical usage daily to ensure compliance to requirements. No risk of release to the environment is anticipated.

6.3 Noise

6.3.1 Noise Level Guidelines and Regulatory Requirements

Potential Project-related noise is regulated by Connecticut General Statutes section 22a-69, which requires the Project to meet the following sound levels: 61 dBA at the nearest residential property line during the day (when the Project would be generating electricity); 51 dBA at the nearest residential property line at night (when some accessory equipment might still be in operation); 66 dBA at the nearest commercial/educational property line; and 70 dBA at the nearest agricultural/industrial property line. The statute also accounts for impulse and other types of noise. Construction noise is exempt from the statute.

6.3.2 Proposed Project-generated Noise

Due to the nature of the use, facility design, required equipment and distance from potential noise receptors, the proposed Project is expected to have no adverse noise-related impact on the surrounding area. Existing uses around the perimeter of the Project Area include farming activities and single-family rural residential uses.

The selected inverter has an acoustic noise rating 65 dBA at 1 meter distance as noted in the inverter specification sheet provided in Appendix B. Utilizing this data point and using the inverse square law at a distance of 135 feet to the nearest residential parcel line (35 Pompeo Road), the Project is expected to generate no more than approximately 33 dBA at the nearest parcel line during the day.

6.4 Air Quality

Because the Project is a solar energy generating facility, no air emissions will be generated during operations and, therefore, an air permit would not be required. Temporary, potential, construction-related mobile source emissions would include those associated with construction vehicles and equipment. Any potential air quality impacts related to construction activities can be considered *de minimis*. Such emissions would be mitigated using available measures including limiting idling times of equipment; proper maintenance of all vehicles and equipment and watering/spraying to minimize dust and particulate releases. In addition, all on-site and off-road equipment would meet the latest standards for diesel emissions, as prescribed by the United States Environmental Protection Agency (USEPA) and, with the above mitigation measures, should reduce the exhaust emissions.

6.5 Visual Impact Assessment

Petitioner selected the Project's location, among other reasons, due to its limited impact on public viewsheds. The Project has been sited on land which is generally low visibility from surrounding roads, and any designated public recreation area (i.e. playing fields, walking trails, or parks). Visual impacts of the Project from multiple directions are naturally mitigated due to distance, topography, and existing vegetation. *Please see* Appendix I – Visual Impact Analysis and Appendix N – Photo Documentation.

6.6 Federal Aviation Administration Determination

Petitioner used the Federal Aviation Administration ("FAA") Notice Criteria Tool to screen the Project Area to assess if the Project triggers the FAA Notice Criteria. The result of the initial

screening on May 2, 2024 is that no additional notice is required for FAA. *See,* Appendix J, FAA Determination.

6.7 Site Soils and Geology

6.7.1 Existing Site Soils and Geology

Soils within the proposed development area predominantly belong to Hydrologic Soil Group B, Charlton-Chatfield complex rocky soils. Group B soils are characterized as moderately well-draining when thoroughly wet. Test pits are scheduled to be performed in the proposed basin locations to field-determine soil geology and infiltration rates, and results will be provided to the Council.

6.8 Historic and Archeological Resources

Heritage Consultants prepared a Phase 1A Cultural Resources Assessment Survey in May 2024. Heritage found that a majority of the property contained a moderate sensitivity for archaeological resources and recommended a Phase 1B study be performed within the limits of the Project Area. Petitioner intends to retain Heritage Consultants to perform a Phase 1B shovel test in the Project Area, and the work is ongoing. A copy of the Phase 1A report is included in Appendix F and Petitioner will provide the results of the Phase 1B investigation, as well as any SHPO correspondence, to the Council.

6.9 Wetlands and Watercourses

6.9.1 Wetlands Delineation

A Wetlands Inspection and Delineation Report dated June 2, 2021 was prepared outlining the survey process and findings. The findings noted that there were three (3) separate wetlands that were delineated and two (2) potential vernal pools that should be investigated further. A copy of this report is included in Appendix H.

6.9.2 Existing Wetlands and Watercourses

Multiple wetland systems were delineated as a result of this effort and are depicted in the report. Generally speaking, wetland systems exist offsite in the forested areas to the north and south of the Project Area. A more comprehensive analysis of the various wetland systems can be found in the Wetland Delineation Report included in Appendix G.

6.9.3 Vernal Pools

Two (2) habitats for vernal pools were discovered just outside the Project Area during the on-site field investigation in 2021. VHB investigated the two potential vernal pools findings and prepared a report dated May 23, 2024. This report generally concluded that the two pools did host obligate species during the spring 2024 inspection period and were classified as vernal pools. No work is proposed within 100 feet of these pools. This vernal pool report is included in Appendix G.

6.9.4 Proposed Project & Mitigation

The Project has been designed to provide a vegetated buffer between the limits of disturbance and the described wetland systems to maintain an ecological edge zone that separates the solar development and stormwater features from the wetland communities. The wetlands will be further protected by incorporation of the permanent stormwater basins and vegetation at the Project Area. The Project limits meet or exceed the CTDEEP Stormwater General Permit's minimum suggested setbacks for both solar panels (100') and overall disturbance (50') to wetlands.

6.10 Wildlife & Habitat (NDDB)

6.10.1 Rare, Threatened & Endangered Plants and Wildlife

A Request for Natural Diversity Data Base ("NDDB") State Listed Species Review was completed and distributed to CTDEEP Wildlife Division for review. In return, a Final Determination dated March 13, 2024 was provided by CTDEEP Wildlife Division, which states that no known species are likely to exist within the Project Area. The Final Determination letter approves construction as proposed. A copy of this letter is included in Appendix H.

6.10.2 Core Forest

Petitioner has secured a letter of no impact to core forest from CTDEEP. This letter is included in Appendix K.

6.11 Water Supply

No water for the construction of the Facility will be sourced on site from either a well or utility hook up. All water used for construction will be trucked in. Minimal long-term water use will be required for operations for the purpose of cleaning modules and this water will also be trucked in.

6.12 Stormwater Management

6.12.1 Existing Conditions

Under existing conditions, the majority of untreated stormwater runoff from most of the Project Area generally flows southerly towards one of the two delineated wetland systems. A small area of drainage flows to the northeast to another delineated wetland offsite. Generally, the Project Area is at its highest elevation in the northernmost ridgeline and slopes towards the wetland systems. The majority of terrain slopes in the Project Area are in the 7-8% range with small portions ranging up to 15% slope. No work is proposed within areas exceeding 15% slope. Information and computations regarding existing conditions hydrology is contained in the Stormwater Report. A copy is included in Appendix E.

6.12.2 Proposed Conditions

The proposed stormwater management system for the Project has been designed to meet State standards found within 2024 Connecticut Stormwater Quality Manual and CTDEEP Stormwater General Permit effective November 25, 2022, as amended. The system consists of five (5) proposed permanent stormwater management basins, which have been strategically located throughout the Project Area to maintain existing drainage patterns to the wetland systems. A seed

mix of either pollinator-friendly grasses and/or permanent turf-forming grasses will be used to establish vegetation directly under the modules to help stabilize the topsoil from erosion, sequester nutrients and pollutants, and lower runoff rates. The only impervious surfaces created by the Project will be a small amount of gravel access road and equipment pads.

Post construction stormwater runoff will be collected and conveyed to the stormwater basins via overland sheet flow. Each basin will include a riprap outlet control structure designed to mitigate peak stormwater flows to predevelopment levels and to provide water quality treatment. Information and computations regarding proposed conditions hydrology is contained in the Stormwater Report. A copy is included in Appendix E.

7.0 Conclusions

The Project meets the standards set forth in Conn. Gen. Stat. §16-50k(a). Specifically:

- The Project meets CTDEEP's air and water quality standards, with no material emissions associated with either construction or operation, and water quality standards associated with construction and operational stormwater management a primary focus of the Project's design;
- The Project has been configured to avoid any substantial environmental impacts by utilizing land which has unused and left fallow for decades;
- The Project will not alter areas of core forest; and
- The Project will not alter areas of prime farmland.

In addition, the Project would largely not be visible from any public viewsheds or from surrounding properties, nor will there be any impacts from noise.

Given the benefits this Project will provide to the State of Connecticut, Petitioner respectfully requests that the Council approve this Project as currently designed and issue a Declaratory Ruling that a Certificate is not required.

Respectfully Submitted,

C-Tec Solar, LLC

By Lee D. Hoffman

Lee D. Hoffman
Liana Feinn
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103
lhoffman@pullcom.com
lfeinn@pullcom.com
860-424-4300