



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

www.ct.gov/csc

VIA ELECTRONIC MAIL

October 12, 2017

Lee D. Hoffman, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702

RE: **PETITION NO. 1313** – DWW Solar II, LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 26.4 megawatt AC solar photovoltaic electric generating facility on approximately 289 acres comprised of 5 separate and abutting privately-owned parcels located generally west of Hopmeadow Street (US 202/CT 10), north and south of Hoskins Road, and north and east of County Road and associated electrical interconnection to Eversource Energy's North Simsbury Substation west of Hopmeadow Street in Simsbury, Connecticut.

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than October 26, 2017. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as a copy via electronic mail. In accordance with the State Solid Waste Management Plan, the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Yours very truly,

Melanie A. Bachman
Executive Director

c: Aileen Kenney, Deepwater Wind, LLC
Council Members
Parties and Intervenors

MB/RDM/LF



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Petition No. 1313

Interrogatories Set 3 - DWW Solar II

October 12, 2017

97. Referring to the Council on Environmental Quality's (CEQ) comments dated August 29, 2017, the CEQ states there is a lack of detailed spatial analysis of wildlife resources on the site. Please submit mapping that delineates areas where critical habitat occurs on the site that supports the listed NDDDB species. To reduce the amount of map "clutter", it may be helpful to provide mapping specific to each site area (north, middle, south) and/or by depicting state/federally listed endangered and threatened species separate from special concern species.
98. In regards to the 133 acres of land that would be left in a natural state for the duration of this project, please describe the location of these natural areas in relation to the 10 town-owned preserved open space parcels that abut the site. Would existing wildlife movement and habitat continuity be maintained between the Town-owned open space and Project natural areas?
99. Referring to Petition Ex. B, the Tree Clearing Map depicts three main areas of forest clearing at the site – 18.1 acres in the north field area, 7.2 acres in the middle field area, and 4.7 acres in the south field area.
- Please provide additional information that characterizes the forested area in and around these three areas including its size, age, composition, and species of conservation concern which are anticipated to use these areas.
 - Are these forested areas part of a recognized larger forested block or are they forest fragments? Please identify which UCONN Center for Land Use Education and Research (CLEAR) forest type is present (core, perforated, edge, patch)
 - If these areas are part of a core forest block, please indicate pre and post-construction core forest block acreage.
 - Please indicate the habitat value of these blocks for core forest species based on UCONN CLEAR definitions.
100. At the evidentiary hearing on October 10, 2017, spacing between panel rows was described as 13-foot panel edge to panel edge.
- Please indicate the rationale for using 13-foot spacing and reasons why spacing cannot be reduced to 10 to 12 feet.
 - One reason described by the Petitioner at the hearing for the 13-foot wide rows was to create enough space for tractor trailers to travel down the rows to access inverter pads; however, the detailed site plans depict 20-foot wide grass paths that access the inverter pads from the perimeter roads. Please explain how the inverter pads will be accessed.
 - Some of the access road/grass path intersections have sharp angles. Would the current design allow for tractor trailer access to all inverter pads?
 - What type construction/substrate is used for the grass paths to support vehicle use?
101. Two of the larger solar projects on the Council's Administrative Notice list, Petition 1178, and Petition 1224, both approx. 20 MW, do not use perimeter solar field access roads. For this project, what is the purpose of having a 20-foot wide perimeter access road around each solar field area? If partial perimeter roads or a central access road were used, could solar panel rows be extended?

102. Referring to Petition Ex. C, Site Plan 3.5., an approximate 170-foot setback from the edge of the solar panel rows to Hoskins Road is shown.
 - a) Why was a 170-foot buffer used at this location?
 - b) What is the purpose of the 70-foot wide area between the chain link fence and the visual mitigation fence? Can the proposed panel rows be extended into this 70-foot wide area?
103. Referring to Petition Ex. C, Site Plan 3.4, a post-construction access gate would be located in the southwest corner of the Middle Solar Field along Hoskins Road. Can this access be relocated to the construction access point by the barns?
104. Would construction of the project create excess cut? Where on the site would this material be deposited?
105. What was the approximate power output of the Project's initial design?
106. Referring to Petition Ex. P, Carbon Debt Analysis, provide a revised figure that factors in solar panel manufacturing and project land clearing.
107. Are ballast-mounted solar panels feasible for this site?
108. At the September 12, 2017 hearing, pp. 47-48, the frequency of mowing within the solar field area is discussed. If mowing is required once per year, can it be done after November 15? If mowing must be done multiple times per year, could the blade height be raised to 8 inches?
109. Referring to DWW II's response to Council Interrogatory 86. When was the last extreme rainfall analysis conducted that was incorporated into the NOAA Precipitation Frequency Data Server? Are there other stormwater management models that utilize more recent extreme rainfall data, representing "new normal" rainfall patterns in Connecticut?