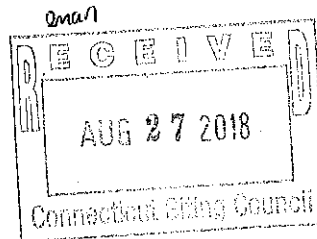




August 27, 2018

Mr. Philip Chester, Town Planner
Town of Lebanon
579 Exeter Road
Lebanon, CT 06249



RE: Petition No. 1137 Amendment #2
Windham Solar, LLC
1 Williams Crossing Road, Lebanon, CT

Dear Mr. Chester,

The Town of Lebanon has requested that Yantic River Consultants, LLC (YRC) review documents related to Petition No. 1137, Amendment #2 submitted to the Connecticut Siting Council by Windham Solar, LLC for the proposed construction and operation of five 1.0 MW and one 1.1 MW Solar Photovoltaic Renewable Energy Generating facilities located at 1 Williams Crossing Road. Petition No. 1137 was originally considered and approved by the Connecticut Siting Council on 8/31/17.

In my review of the application and petition history for this site, I noted that the Town of Lebanon through its Inland Wetlands and Watercourses Commission (IWWC) and Planning and Zoning Commission (PZC) was afforded the opportunity to review and provide comment on the solar facility site plans and supplemental reports as part of formal applications, the most recent approval issued on 4/21/17 by the PZC for Site Plan Modification.

The proposed changes included as part of Petition No. 1137, Second Amendment, have not been submitted to the Town of Lebanon for review as part of an application to any Board or Commission. I recommend that this project continue to be reviewed by the PZC as part of a formal application. This method of "municipal consultation" affords the PZC, which has statutory powers and duties to hear, consider, and decide upon applications for site plans, an opportunity to review the merits of the proposal at a public meeting in which the residents can be reasonably expected to attend and participate.

Examples of the importance of the local Commission review process are provided in the original approval letter, dated September 5, 2017, for Petition No. 1137. The Municipal Consultation section of the letter includes the history of PZC reviews and conditions of approval generated as part of their site plan application process. Further, the Connecticut Siting Council condition of approval #4 required "notification/coordination with the Town of Lebanon regarding the installation of, and inspection of, erosion and sedimentation control measures", which would fall under the jurisdiction of the PZC as described in Section 7.8 of the Zoning Regulations.

Beyond my recommendation for review by the PZC and IWWC, following please find my review comments for the documents included with the Petition No. 1137 Amendment #2 package, dated July 12, 2018.

SITE PLAN REVIEW

This Spring, erosion and sedimentation from construction activities on the Windham Solar site resulted in the deposition of sediment within wetlands and surrounding upland review areas. In response, a Notice of Violation was issued by the Connecticut Department of Energy and Environmental Protection (CTDEEP) and an Inland Wetland Buffer Permit Application was submitted to the Town of Lebanon Inland Wetlands and Watercourses Commission (IWWC) for "restoration within the upland review area". YRC reviewed the application documents, visited the site and found that a combination of issues resulted in erosion of the unstabilized soils and the deposition of sediment in downstream upland review and inland wetland areas, including:

- Inadequate spacing and/or placement of erosion and sedimentation controls resulting in large areas of exposed soils, concentration of runoff and the development of rill erosion,
- Insufficient capacity and/or lack of maintenance for the erosion controls as installed, resulting in failure and overtopping of perimeter controls and basins, and
- Failure to perform inspections and implement addition measures to control the concentrated runoff from the watershed and wetland areas to the north and west of the construction site.

Given the recent history of erosion and sedimentation control issues on the site, expanded footprint of the facility, and proximity of new land disturbance activities adjacent to natural resources, I recommend the following:

1. The erosion and sedimentation controls on the site be monitored by a third party for the duration of construction until the site has been sufficiently stabilized. Such work should be in compliance with Condition of Approval #4 described in the Connecticut Siting Council letter dated September 5, 2017.
2. The plans propose to shift the fenceline around "Phase II Area A" and expand the solar panel footprint. I recommend that the existing fenceline be maintained to the west and south to avoid direct impact to the existing steep vegetated slopes.
3. A portion of "Phase II Area A" will drain to the west and south, towards the above referenced steep slopes. No stormwater controls are proposed in this area. All runoff from the disturbed site should be diverted away from the steep slopes and additional stormwater controls proposed to ensure that the embankment will not be compromised.
4. "Phase II Area B" be eliminated or reconfigured as it cannot be readily accessed for maintenance and will result in a narrow lane of disturbance perpendicular to relatively steep slopes.
5. The "temporary sediment trap & permanent water quality basin" at the east of the Phase II Area A is generally inaccessible for maintenance and creates an unnecessary point discharge. See comment 4.
6. All new solar panels should be separated from the perimeter chain link fence to allow for establishment of a vegetated perimeter that can be readily accessed and maintained. This

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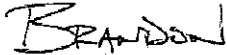
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1 Williams Crossing Road, Lebanon, CT

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perimeter should provide a complete loop that can be traversed by maintenance vehicles and equipment without dead ends or obstructions.

Should you have any questions, please don't hesitate to contact me at (860) 367-7264.

Sincerely,

A handwritten signature in black ink that reads "BRANDON". The letters are slightly slanted and connected, with a stylized 'B' and 'D'.

Brandon Handfield, PE
Civil Engineer