

COUNCIL ON ENVIRONMENTAL QUALITY



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Executive Director

August 29, 2019

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

RE: PETITION NO. 1378 – Greenskies Renewable Energy, LLC (GRE) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 5.0-megawatt AC solar photovoltaic electric generating facility on approximately 16.5 acres located generally east of Taugwonk Road and Taugwonk Spur Road and north of Interstate 95 in Stonington, Connecticut and associated electrical interconnection.

Dear Ms. Bachman:

The Council on Environmental Quality (“the Council”) has reviewed the Petition for Declaratory Ruling noted above and offers the following comments for consideration by the Connecticut Siting Council.

1. Commendable Siting and Design

The site is composed of both forested land and farmland. The Council commends GRE for the collaboration with the Connecticut Department of Agriculture on this project to create a “Farmland Restoration Plan” for the site. If implemented, the plan would retain the site’s topsoil and restore, at a minimum, an amount of acreage equivalent to the area disturbed throughout the farm property for current and future agricultural purposes. Additionally, it promises consideration of at least two “dual use agricultural activities” on the site, such as native pollinator habitat enhancement, apiculture, suitable crop cultivation, and small livestock grazing, among others. These activities, identified in consultation with Connecticut Department of Agriculture, would be appropriate conditions of approval by the Siting Council.

2. Carbon Offset

The greenhouse gas offset calculations used in the Petition were from EPA’s Greenhouse Gas Equivalencies Calculator. Analysis using either ISO-New England’s most recent marginal emission rates for locational marginal units (LMU) or the average emission rate for all units within the New England generation mix produces an offset value that is approximately half of the EPA (national) calculator.

Because of this discrepancy between the national and state/New England calculations, consideration of adoption of a standard for CO₂ offset computations for energy projects is encouraged. The Council acknowledges that whichever method is used, the CO₂ reduction from the solar arrays will exceed the reduction in long term carbon absorption of the three acres of forest that will be removed.

3. Inland Wetlands

The Council notes that the proposed site contains a few areas of inland wetlands primarily along the proposed electrical service. The Council recommends that in designing the installation of the proposed electrical service, best management practices (BMP) be employed before, during, and after construction of the proposed project to help limit wetland impacts. Among these would be:

- avoiding both above and below-ground wetland crossings unless absolutely necessary;
- taking advantage of already disturbed areas such as access roads or easements;
- spanning a wetland by locating utility poles on either side of the wetland, instead of disturbing the interior; and
- preventing significant diversion of surface water and groundwater sources, which could affect nearby wetlands.

The Council recommends that the Siting Council confirm that the proposed Stormwater Management Basin No.2, located along the entire western boundary of the proposed project site, would not adversely affect flow to wetlands and to the identified vernal pool.

Thank you for your consideration of these comments. Please do not hesitate to contact the Council if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Peter Hearn". The signature is written in black ink and is positioned above the typed name and title.

Peter Hearn
Executive Director