

COUNCIL ON ENVIRONMENTAL QUALITY



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Executive Director

September 4, 2020

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

RE: PETITION NO. 1427 – SunJet Energy, LLC notice of election to waive exclusion from Connecticut Siting Council jurisdiction, and petition for a declaratory ruling, for the proposed construction, maintenance and operation of a 1.0-megawatt or less AC solar photovoltaic electric generating facility and associated electrical interconnection located at 0 Matthews Street and 125 Hill Street, Bristol, Connecticut.

Dear Ms. Bachman:

The Council on Environmental Quality (“the Council”) supports the development of clean, renewable energy technologies on appropriate sites in Connecticut. The Council is concerned about the scale of the statewide conversions of active, or potentially usable, farmland, which the legislature intended to be preserved when it enacted PA 17-218, for renewable energy installations.

Both the preservation of farmland and development of renewable energy sources are essential to the State’s future. It is at the Siting Council that these priorities intersect and sometimes conflict. Since June of 2020, this Council has reviewed six proposals to utilize farmland for renewable energy projects. The total farm acreage of active or potentially usable farmland in those five Petitions and one Application is over 330 acres. Inclusion of the all projects reviewed by this Council in the past eight months brings the total to over 540 acres of Connecticut farmland that were the target for siting of solar energy facilities. By comparison, the total acreage acquired for preservation by the State for all of 2019 was 773 acres.

While this Petition proposes the use of relatively few farmland acres compared to other recent Petitions, the continuing accretion of multiple individual decisions to site solar facilities on productive agricultural land has cumulative regional economic and ecological implications that go beyond the loss of prime soils. For example, there are many permanent and migratory species that depend on Connecticut’s farm fields for habitat. The Council urges the Siting Council to weigh the cumulative regional economic and ecological factors when assessing the scale and location of each proposed siting. Consideration of such cumulative and regional impacts by the Siting Council is within its authority under CGS Sec. 16-50p(a).

The Council also has the following comments regarding noise, wildlife, and visibility.

The Petitioner states that “once the Project is constructed and operational, the only equipment that will emit noise consists of the inverter cooling which cannot be heard

outside of the Project fence line.” However, the Petitioner also acknowledges that “no formal noise study was completed for the Project”. Furthermore, the proposed project would utilize a tracking system for the solar panels, which may emit noise. The Council recommends that the Petitioner confirm that noise from the proposed project would not exceed applicable noise standards at the nearest residential property lines.

The Council notes that three state-listed species may occur at the proposed site and that the Department of Energy and Environmental Protection (DEEP) Natural Diversity Database (NDDB) has issued recommendations in their determination letter dated June 29, 2020. The Council recommends that the Petitioner develop and submit to the Siting Council a Mitigation Plan for the identified state-listed species that incorporates, at a minimum, all of the recommendations suggested by the NDDB. The Council also recommends that the Petitioner consider vegetation around the eastern and southern sides of the proposed utility pad and electrical equipment that would be constructed near the southern end of the existing barn because of the possibility that structures at 125 Hill Street may be eligible for listing on the National Register of Historic Places.

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 includes a long horizontal flourish extending to the right.

Peter Hearn
Executive Director