



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

April 29, 2021

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

PETITION NO. 1451 - C-Tec Solar, LLC (Petitioner) petition for a declaratory ruling for the proposed construction, maintenance and operation of a 3.8-megawatt AC solar photovoltaic electric generating facility and a 2.2-megawatt AC solar photovoltaic electric generating facility located at 277 Sadds Mill Road, Ellington, Connecticut, and associated electrical interconnection.

Dear Ms. Bachman:

The Council on Environmental Quality (“Council”) supports the development of clean, renewable energy technologies on appropriate sites in Connecticut. The Council offers the following comments regarding Petition 1451.

1. Wildlife

The Petitioner states that the most recent Natural Diversity Data Base (NDDB) mapping was reviewed and that “no NDDB polygon exists partially or entirely on the Site”. While consultation with NDDB is not required, it is premature to state that “the Project will not adversely affect state-listed species” since no survey was completed to assess the presence of endangered, threatened and special concern species, even though the Petitioner “acknowledges that the Site contains suitable habitat for such species.” The Council wishes to make it clear, as it has with prior petitions, that the NDDB mapping is a pre-screening tool and is not a substitute for an on-site survey. Consequently, the Council recommends that the Petitioner survey the proposed site to assess the presence of wildlife and endangered, threatened and special concern species or suitable habitat that might be present. If found, the Council recommends that the Petitioner consult with the NDDB to develop and implement plans to eliminate or mitigate any potential adverse impacts.

The Council supports the Petitioner’s proposal to establish a “Habitat Enhancement Area.” and to plant a specific pollinator blend of low-growth grasses within the fenced perimeter of the Project Area to attract and promote the propagation of pollinator species and improve the quality of the soils comprising the Project Area.

2. Prime Farmland Soils

The Petitioner states that approximately 40 acres within the proposed site is underlain by prime farmland soils with approximately 11 acres within the proposed project limits. The Council is concerned about the impacts the proposed project would have on the prime farmland soils on the proposed site. The Council recommends that best practices be employed during construction that might allow for a future restoration of those soils to productive agricultural use. These practices include minimizing grading, trenching and compaction of prime farmland soils.

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Acting Chair

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Peter Hearn
Executive Director

3. Groundwater

The Petitioner states that the groundwater underlying the proposed site is classified as "GA". The Council recommends that the Petitioner develop and utilize a Spill Prevention, Control and Countermeasure Plan during construction and operation of the proposed facility to reduce the likelihood and impact of any spills on the proposed site.

Thank you for your consideration of these comments.

Sincerely,

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

Peter Hearn
Executive Director