



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

June 6, 2022

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Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

PETITION NO. 1516 - Connecticut Green Bank and CEFIA Holdings, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.175-megawatt AC solar photovoltaic electric generating facility located at the Enfield & Willard Correctional Institutions at 289 and 391 Shaker Road, Enfield, 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 1516.

### 1. **Wildlife**

The Petitioner states that an initial request for review of the Natural Diversity Database (NDDDB) was submitted to the Connecticut Department of Energy and Environmental Protection (DEEP) during the spring of 2020 and that DEEP responded with a determination on August 3, 2020. The Council notes that this DEEP determination letter states that it is valid for **one** year. The Council supports the Petitioner’s efforts to reduce impacts to turtles during the construction of the proposed solar facility by incorporating all of the recommended protection strategies for turtles. The Council recommends that the NDDDB be consulted and concur with the findings of the REMA Biological Assessment dated April 11, 2022. In addition, the Council recommends that the Petitioner consult with the wildlife division at DEEP to determine if the proposed project would adversely impact the nearby bird sanctuary.

### 2. **Farmland soils**

The Petitioner states that the proposed site is currently a hayfield and that the soil in the area is classified as Farmland of Statewide Importance. The Council recommends that 1) the Petitioner consult with the Connecticut Department of Agriculture (DOAG) regarding the potential impact the proposed project might have on farmland soils, 2) consider the placement of the solar panels on paved surfaces and/or rooftops to avoid impacts to important farmland soils, and 3) to consider agricultural co-use activities, as appropriate. Lastly, the Council recommends that best practices be employed during construction that might allow for a future restoration of those soils to more productive agricultural use. These practices include minimizing grading, trenching, and compaction of the farmland soils.

### 3. Wetlands

The Petitioner states that the proposed site contains two small wetlands in the vicinity of the proposed array and two other wetlands along the route of the transmission line between the array and the Willard facility. The Petitioner also states that a 100-foot buffer has been maintained between all proposed panels in the array and downgradient wetlands. The Council recommends that the Petitioner utilize a minimum 100-foot buffer around all identified wetlands and assess the possibility of avoiding impacts to the existing wetlands located east of the proposed array by using an interconnection line route east along Shaker Road, which would also avoid potential habitat for alder flycatcher.

The Council notes that the comments above address only certain elements of the materials provided by the Petitioner at the time of the filing. Additional information can become evident through comments offered by other parties and during the Siting Council's administrative hearing process. The absence of comment(s) by this Council about any Petition or Application, or any aspects thereof, may not be interpreted as an endorsement of a proposed project, or its components or that this Council might not have comments or concerns on more specific issues raised during the hearing process.

Thank you for your consideration of the Council's comments.

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive style with a long horizontal stroke at the end.

Paul Aresta  
Executive Director