



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. 1517 - 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 1.8-megawatt AC solar photovoltaic electric generating facility located at the Osborn Correctional Institution at 335 Bilton Road, Somers, 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 1517.

1. **Wildlife**

The Petitioner states that a review of the Natural Diversity Database (NDDB) map for Somers indicates that the project site is not located within any reported locations of State and Federal Listed Species and Critical Habitats. The Council notes that there might be state-listed species or suitable habitat on the proposed site that are unknown or unreported. Consequently, the Council recommends that the Petitioner assess the proposed site for the presence of any state-listed species or suitable habitat that might be present. If found, the Council recommends that the Petitioner consult with the NDDB to develop and implement measures to eliminate or mitigate any potential adverse impacts to those species.

2. **Farmland Soils**

The Petitioner states that the northern half of the project site is classified as Farmland of Statewide Importance. The Council recommends that the Petitioner 1) 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 proposed 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 of Statewide Importance.

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, sweeping tail on the letter 'a'.

Paul Aresta
Executive Director