



Town of Hamden
Planning and Zoning Department

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Brack G. Poitier
Chair, Hamden Planning and Zoning Commission

September 9, 2020

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

RE: **PETITION NO. 1425** – Gaylord Mountain Solar Project 2019, 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 1.9-megawatt AC solar photovoltaic electric generating facility located at 360 Gaylord Mountain Road in Hamden, Connecticut, and associated electrical interconnection.

Dear Ms. Bachman:

On September 8, 2020 the Hamden Planning and Zoning voted unanimously to convey to the Siting Council its strong objection to the Gaylord Mountain Solar Project noted above. Given the role that trees play in resisting the negative impact of climate change, destroying more than 12 acres of pristine forest in order to produce a limited amount of solar energy is an ill-conceived idea that should be rejected by the Siting Council.

The Commission noted several specific issues, including the following:

- The site is steeply sloped. There is a substantial risk of storm water runoff causing flooding and erosion
- The site lies within the Mill River Watershed and is thus an area of particular concern
- The project is located very close to five wetland areas, putting them at great risk of degradation
- One year ago the Planning and Zoning Commission approved its ten year Plan of Conservation and Development. The document, which emphasizes environmental sustainability, notes the critical role played by trees in combatting the negative impacts of Climate Change as well as in reducing flooding.
- Public Act 17-218 requires a comprehensive environmental review by DEEP that has not been carried out. It also encourages use of landfills and brownfields as better alternative sites:

Sec. 2. (NEW) (Effective July 1, 2017) In any solicitation issued under section 16a-3f, 16a-3g, 16a-3h or 16a-3j of the general statutes, as amended by this act, after July 1, 2017, the Commissioner of Energy and Environmental Protection shall consider the environmental impacts of any

proposal located in the state that is received in response to such solicitation, including, but not limited to, the impacts to prime farmland and core forests and the reuse of sites with limited Senate Bill No. 943 Public Act No. 17-218 2 of 17 development opportunities such as brownfields and landfills, as identified by the commissioner.

- The environmental assessment submitted by the applicant is flawed and inadequate. It omits a key wildlife corridor and minimizes the significance of the core forest. The applicants should be required to submit a comprehensive DEEP study of the specific site and the likely impact of the project
- The project runs counter to State policy regarding environmental sustainability
- The project will adversely affect the quality of life and housing values of adjacent residential properties
- The analysis of alternative sites not surprisingly identified other locations that were deficient. It's not a convincing argument and begs the question of what are the other options that would not destroy over twelve acres of forest
- The project doesn't even provide electrical power to Hamden. The solar field offers no appreciable benefit to the Town.

The Planning and Zoning Commission also strongly recommends that the site visit and public input session requested by Mayor Leng, to allow Hamden residents to express their objections directly, be approved by the Siting Council. Failure to do would deprive the public of an essential element of the review process the Siting Council follows for wireless communications towers. Destruction of more than 12 acres of forest for the construction of a solar field is at least of equal significance.

I appreciate your consideration of our concerns.

Sincerely,



Brack G. Poitier
Chair, Hamden Planning and Zoning Commission