

December 01, 2020

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

cc: Lee D. Hoffman, Attorney  
Pullman & Comley LLC  
90 State House Square  
Hartford, CT 06103-3702

RE: Verogy  
Proposed 3.5 MW (AC) Solar Array – Burlington Solar One  
Prospect Street, Burlington, CT 06013

Dear Ms. Bachman,

Lee D. Hoffman, Attorney for Pullman & Comley LLC on behalf of Verogy (“Petitioner”) contacted the Connecticut Department of Energy and Environmental Protection (“DEEP”) Bureau of Natural Resources and informed us of the intention to file a petition for a declaratory ruling with the Connecticut Siting Council. Petitioner proposes to construct a solar photovoltaic facility with a capacity of two or more megawatts, to be located on Prospect Street, Burlington, CT 06013 (“Site”). We understand that such Petition has already been submitted to the Siting Council.

Pursuant to Sec. 16-50k of the Connecticut General Statutes the DEEP Bureau of Natural Resources staff have reviewed documents submitted by the Petitioner concerning this proposed project, which include a site map dated May 6, 2020 with email dated July 1, 2020 from Attorney Hoffman. Additional information was requested and received via emails on; July 9, August 7, August 12, October 10, October 21, October 28, and November 10, 2020.

As part of DEEP’s Forestland Habitat Impact Assessment Guidelines, we consider any disturbance to or conversion of natural habitats within the mapped area as an indication of potential material affect to core forest. This project falls within our mapped area. Sixteen (16) forested acres will be cleared for the installation of the solar panels, associated systems and site work involved with this proposed project. This clearing will result in the loss of 6.98 core forest acres and a conversion of an additional 7.41 core forest acres to edge forest acres.

Having established the presence of core forest on the project site, we then evaluated the habitat impacts that would be occasioned by the loss of this forest. The presence of eastern box turtle, a State species of special concern, is indicative of high-quality core forest habitat. Therefore, we seek to preserve mobility and connectivity for this and other species. Additionally, DEEP prioritizes preserving core forest connectivity for species not included in the site inventory through the preservation of sufficient undisturbed buffers around the site’s wetlands. The buffers proposed in this petition may be sufficient to protect the water quality of the site’s wetlands and watercourses, but current research calls for the

preservation of 300' buffers as a best management practice to protect connectivity in the forest along wetland movement corridors. The current proposal does not provide for this level of protection for two of the three identified wetlands at the project site. We therefore deem that the habitat impacts to this core forest block that would arise from the solar development as proposed would materially affect this host block of core forest.

Connecticut is one of the most heavily forested states in America. Our forests clean our air and water, shelter our wildlife, sequester carbon, contribute tens of millions of dollars to our economy, and add immeasurably to the quality of our lives. Yet every day, our forests are under threat. Invasive insects and diseases and our dense and growing human population continue to stress our forests in unprecedented ways. Thank you for helping us to conserve a healthy core forest for future generations, providing public transparency and working to make thoughtful development choices.

Nothing in this letter relieves the Petitioner of other obligations under applicable federal, state, and local law that may be necessary as part of the proposed project design and implementation.

If you have any questions, you may contact me at 860-424-3010, or by mail at 79 Elm Street, Sixth Floor, Hartford, CT 06106-5127.

Sincerely,



Rick Jacobson, Chief  
Bureau of Natural Resources  
Department of Energy and Environmental Protection

CC: Bryan P. Hurlburt, Connecticut Department of Agriculture  
Jenny Dickson, Director of Wildlife, Bureau of Natural Resources, DEEP  
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