

COUNCIL ON ENVIRONMENTAL QUALITY



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Executive Director

September 18, 2020

Melanie 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 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:

The Council on Environmental Quality (“the Council”) supports the development of clean, renewable energy technologies on appropriate sites in Connecticut and offers the following comments with regard to Petition No. 1425 (Petition):

1. Visibility

The Council supports the Petitioner’s strategy to provide visual screening of the proposed facility by maintaining a buffer of trees and by constructing an earthen berm along the southern side of the proposed facility and asks whether consideration should be given to using a coniferous buffer to provide screening during leaf-off conditions. On the northwest side of the site is the Caleb Doolittle Jr. House, which is potentially eligible for listing in the National/State Register of Historic Places and consequently should be considered for vegetative screening too.

2. Wetlands

While the total area of wetlands affected by the project is small, the Council notes, with concern, that the Petitioner proposes only minimal, or no, buffer areas between the identified wetlands and the proposed project. With regard to Wetlands 1, 2, 3, and 4, the proposal states, “none of these wetlands areas will not be adversely impacted”. With the exception of the 47 ft. buffer allowed for Wetland 3, they all have buffers of 25 ft. or less. At Wetland 5, there is no buffer proposed. The project is within the public water supply watershed (Mill River System) of Lake Whitney Reservoir, an active source of public drinking water for the Regional Water Authority. The value of wetland buffers to reduce wetland filling and contamination is well established.¹ The role of these wetlands, particularly, should be evaluated with consideration of installing buffers at all the site’s wetlands that would be sufficient to prevent any deterioration of the quality and quantity of the public water supply.

¹ Planner’s Guide to Wetland Buffers for Local Governments, Environmental Law Institute, March 2008;
https://www.ecosystemmarketplace.com/wp-content/uploads/archive/documents/Doc_457.pdf

Additionally, the presence of the proposed project within the drinking water supply's watershed necessitates that the proposal incorporate a Spill Prevention, Control, and Countermeasure (SPCC) plan for the proposed project that includes provisions for the proper storage of fuel and/or refueling on the proposed site.

3. Stormwater

The Council notes that development of the proposed solar facility may present some challenges regarding erosion control and stormwater management given the slopes and soil conditions present. While the Petitioner has proposed to phase construction, use hydroseeding, and install a series of filter socks along existing contours every 75 feet, the Council recommends that the Petitioner engage an environmental monitor to periodically inspect the proposed site during and after construction to ensure that the erosion and sedimentation control features are installed and maintained properly.

Thank you for your consideration of these comments. Please do not hesitate to contact the Council if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Peter Hearn". The signature is written in black ink and has a long, horizontal flourish extending to the right.

Peter Hearn
Executive Director