

COUNCIL ON ENVIRONMENTAL QUALITY



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Executive Director

March 27, 2020

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

RE: PETITION NO. 1347A – GRE GACRUX 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 16.78-megawatt AC solar photovoltaic electric generating facility located at 117 Oil Mill Road and associated electrical interconnection to Eversource Energy’s existing substation at 325 Waterford Parkway North in Waterford, Connecticut. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a (b).

Dear Ms. Bachman:

The Council on Environmental Quality (“the Council”) supports the development on clean, renewable energy technologies on appropriate sites in Connecticut and offers the following comments with regard to Petition No. 1347A (Petition).

1. Stormwater Runoff

The Council notes that the proposed site contains steep slopes, especially in the center of the site to the south and southeast. Slopes of this degree warrant special erosion controls. Every effort should be made to maintain pre-development drainage patterns and to maintain flows to existing wetland and watercourse areas. The “Draft General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities” which is being considered for adoption by the Department of Energy and Environmental Protection (DEEP) contains recommendations for addressing solar installations on such slopes. The Council recommends that the Petitioner adopt those recommendations, which are the state-of-the-art techniques for installing solar panels on sloped terrain.

2. Inland Wetlands and Vernal Pools

The Petition states that a 100-foot buffer would be maintained around all identified wetlands except in areas where the access roads intersect the buffer area. The Council suggests that the Petitioner evaluate the possibility of moving a portion of the road that provides access for the northern-most panels further to the north to avoid the wetlands buffer area. (Depicted on the Layout and Materials Plan, Sheet C-3.2).

3. Vegetation

The Petitioner states that “restoration of the Project Site within the limits of disturbance is proposed to include new low-maintenance ground cover within the solar array field and adjacent to the perimeter fencing. Establishing vegetative cover will help to stabilize the soil and reduce stormwater runoff. Areas between the perimeter fence and the limits of clearing will receive a mix of native low-lying plants, shrubs, and groundcover.” The Council recommends that the Petitioner reference the provisions of DEEP’s Draft General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities” for guidance on timing of seeding and plantings. Pollinator-friendly plantings should be utilized where appropriate.

4. Historic and Archeologic

The Council notes that the Petitioner failed to conduct or include information regarding a Phase 1B cultural resources reconnaissance survey for the moderate/high sensitivity areas that would be impacted by construction, as recommended by the Phase 1A report (Appendix G). The Petitioner states that the Phase 1B survey would be done prior to breaking ground; however, this information should be known in advance to be useful to the Siting Council’s in its deliberations, and therefore should be part of the evidentiary record for this proceeding. The Council recommends that the Petitioner conduct the Phase 1B cultural resources reconnaissance survey as soon as possible and seek concurrence from the State’s Historic Preservation Office regarding the proposed project.

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 black ink that reads "Peter Hearn". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Peter Hearn
Executive Director