



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. 1514 – 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 1.95-megawatt AC solar photovoltaic electric generating facility located at the Maloney & Webster Correctional Institutions at 900 Highland Avenue, Cheshire, 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 1514.

1. **Wildlife**

The Petitioner states that an initial request for review of the Natural Diversity Database (NDDB) was submitted to the Connecticut Department of Energy and Environmental Protection (DEEP) during the spring of 2020 and that DEEP responded with a determination on July 22, 2020. The Council notes that the DEEP determination letter is valid for two years and that another request for an NDDB determination must be sought if work has not begun on the proposed project by July 22, 2022. The Council supports the Petitioner’s efforts to reduce impacts to turtles during the construction of the proposed solar facility by incorporating all of the recommended protection strategies for turtles. Since the proposed project might not begin construction before July 22, 2022 if approved, the Council recommends that the Petitioner resubmit a request for an updated determination to the NDDB for the proposed project.

2. **Farmland Soils**

The Petitioner states that the proposed site is currently a hayfield and the soil is classified as Prime Farmland or Farmland of Statewide Importance. The Council recommends that 1) the Petitioner consult with the Connecticut Department of Agriculture (DOAG) regarding the potential impact that this proposed project and other proposed solar projects proximate to this proposed site could have on agricultural resources in the area, 2) consider the placement of the 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 soils.

3. Visibility

The Council supports the Petitioner's proposed use of vegetation to provide a visual buffer between nearby residences and the proposed project. The Council recommends that the Petitioner consider developing a landscape plan that incorporates deer resistant, native plants for the proposed visual screening along the southern edge of the field.

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 cursive script that reads "Paul Aresta". The signature is written in black ink and is positioned below the word "Sincerely,".

Paul Aresta
Executive Director