



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

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June 6, 2022

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

PETITION NO. 1515 - 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 Manson Youth Correctional Institution at 42 Jarvis Street, 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 1515.

1. Wildlife

The Petitioner states that an initial request for review of the Natural Diversity Database (NDDDB) 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 13, 2020. The Council notes that the DEEP determination letter is valid for two years and that another request for an NDDDB determination must be sought if work has not begun on the proposed project by July 13, 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 construction of the proposed project could begin after July 13, 2022 if approved, the Council recommends that the Petitioner resubmit a request for an updated determination to the NDDDB for the proposed project.

2. Farmland Soils

The Petitioner states that the proposed site is currently a hayfield and that the soil in the area for Array 1 is classified as Farmland of Statewide Importance and the soils in the area of Array 2 is classified as an area of Prime Farmland. 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.

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 black ink that reads "Paul Aresta". The signature is written in a cursive style with a long, sweeping underline.

Paul Aresta
Executive Director