STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

December 13, 2023

Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
Melanie.Bachman@ct.gov

PETITION NO. 1598 – Windsor Solar One, LLC (Petitioner) proposed construction, maintenance and operation of a 3.0-megawatt AC solar photovoltaic electric generating facility located at 445 River Street, Windsor, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1598.

1. Farmland

The Petitioner notes that the Project Site is comprised 100 percent of active farmland and the Connecticut Department of Agriculture (DOAg) notes that the proposed project area is underlain by statewide important farmland soils. Although the DOAg issued a conditional determination that the proposed project "will not materially affect the status of project land as prime farmland" (revised letter dated November 27, 2023), the Council wants to emphasize the importance of agricultural land in Connecticut and to note that the continuing accretion of multiple individual decisions to site solar facilities on productive agricultural land has cumulative regional economic and ecological implications. The Council recommends that the Petitioner employ best practices during construction and operation that might allow for the future restoration of farmland soils to a more productive agricultural state by minimizing grading, trenching, and compaction of farmland soils.

2. Visibility

The Petitioner states that "the location of the proposed Project, coupled with the design of the proposed solar energy Facility, will be visible from River Street and the parcels to the west. Cross sections displaying the proposed Project elements in relation to the nearest residence have been prepared in support of this Petition and are included in Appendix J." However, there is only one cross section in Appendix J, and the cross section depicts the predicted visibility from the property located north of the proposed facility, not to the west, which could have a greater visual impact since the proposed solar panels would extend in excess of 800 feet along River Street. The Council recommends that the Petitioner assess the visibility of the proposed facility from several properties to the west of the proposed project site, both as it appears currently and as it might appear with the installation of the proposed vegetative screening. Such an analysis will help to determine if the proposed vegetation would be adequate to effectively screen the proposed facility, thereby minimizing any potential visual impact on the project's neighbors.

3. Wildlife

The Council notes that the proposed project site appears to be located within a Connecticut

Department of Energy and Environmental Protection (DEEP) Natural Diversity Data Base (NDDB) buffer area. The Council also notes that the United State Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) system identified the Northern Long-eared Bat (NLEB) (Myotis septentrionalis), a federally listed "Endangered" species, as a species that may potentially occur in the project area. Although the Council acknowledges that no trees would be removed for the proposed facility, there is no information in the Petition to suggest that the Petitioner utilized the NLEB Rangewide Determination Key available in IPaC to confirm that there would be no impact on NLEB.

The Council's comments above addresses 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,

Paul Aresta
Executive Director