



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

### VIA ELECTRONIC MAIL

December 14, 2023

Melanie Bachman, Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051  
[Melanie.Bachman@ct.gov](mailto:Melanie.Bachman@ct.gov)

PETITION NO. 1599 – TRITEC Americas, LLC (Petitioner) notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes §16-50k(e), and petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 0.999-megawatt AC solar photovoltaic electric generating facility located at Parcel No. 30-25-59 Spencer Street, Suffield, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1599.

### 1. Farmland Soils

The Petitioner notes that the “Host Parcel is an active corn and hay farm” and that the Petitioner “intends to continue both agricultural practices throughout the Project’s lifespan to the greatest extent possible.” However, it is unclear how that might be accomplished since the Site Layout Plan, Sheet 2.11, depicts very little area where active cultivation of corn or hay could be accomplished. 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 1) provide additional details on the proposed agricultural practices planned for the site, and 2) employ best practices during construction and operation that might allow for the future restoration of farmland soils to a more productive agricultural state by retaining the topsoil and minimizing grading, trenching, and compaction of farmland soils.

### 2. Erosion & Sedimentation (E&S) Controls

The Petitioner notes that E&S controls, consisting of silt fencing with compost filter socks, geotextile silt fences with wings, and an anti-tracking pad at the proposed facility entrance, would be installed to comply with standards set by the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control. The Council supports efforts to minimize the impact of erosion and sedimentation and recommends that the Petitioner consider utilizing updated methods and techniques for minimizing erosion and sedimentation based on the best currently available technology and strategies, as identified in the revised Connecticut Guidelines for Soil Erosion and Sediment Control, which has an effective date of March 30, 2024, as appropriate. In addition, the Council notes that certain E&S control products have been found to entangle wildlife, including reptiles, amphibians, birds and small mammals. The Council recommends that the Petitioner avoid/minimize the use of E&S control measures that are made of plastic and

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Paul Aresta  
*Executive Director*

have the potential for wildlife entanglement.

### **3. Visual Impact**

The Petitioner states that “tree lines will be maintained to the best extent practicable, and additional evergreen trees will be planted to provide a visual buffer to adjoining properties.” In addition, the Petitioner states that “planting materials, consisting of a mix of evergreen species, will provide year-round screening on the northern, northwestern, and northeastern sides of the Project area.” The Council supports the Petitioner’s efforts to minimize any potential visual impact associated with the proposed facility and recommends that the proposed evergreen trees, be native, deer-resistant species that would be of sufficient size to effectively screen the proposed facility.

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,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Paul Aresta  
Executive Director