



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

PETITION NO. 1600 – 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. 30-2-74-40 Chamberlain Highway, Berlin, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1600.

1. Farmland Soils

The Petitioner states that “the host parcel is currently an operating hay farm” and “the proposed Project will be an “Agrivoltaic” project”; however, it is unclear what agricultural co-uses would be undertaken at the proposed site. 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 agrivoltaics co-uses, 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 and a crushed stone tracking pad, will be installed during construction activities to comply with standards set by the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control to manage the land disturbance from the development and protect surface water features. The Council supports efforts to minimize 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 have the potential for wildlife entanglement.

Keith Ainsworth
Acting Chair

Alicea Charamut

Christopher Donnelly

David Kalafa

Kip Kolesinskas

Matthew Reiser

Denise Rodosevich

Charles Vidich

William Warzecha

Paul Aresta
Executive Director

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 style with a long, sweeping tail on the letter "a".

Paul Aresta
Executive Director