



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

### VIA ELECTRONIC MAIL

February 29, 2024

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. 1609 – 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 250 Carter Street, Manchester, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1609.

#### 1. Core Forest

The Petitioner notes that approximately seven (7) acres of small core forest are proposed to be cleared for the development of the proposed project. As stated in the Petition, “core forests provide habitat for many species of wildlife that cannot tolerate significant disturbance. The loss of core forest cover diminishes water purification and habitat values, and could result in heavier runoff, which might lead to poorer water quality and impaired habitat.” The Council does not support the destruction of core forest.

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

The Petitioner states that “approximately 1,100 square feet of unavoidable direct impact is proposed to inland wetlands and watercourses in order to construct an access drive from Carter Street to the developable portion of the property.” In addition, approximately 0.5 acre of direct impacts are anticipated in the upland review area of Wetland 1. To prevent adverse direct and indirect impacts to wetlands and watercourses, the Petitioner proposes to utilize erosion and sedimentation controls (E&S controls), primarily consisting of geotextile silt fences with wings, compost filter socks, construction entrance, dust control measures, and a temporary sediment trap. The Council supports efforts to minimize the potential adverse impact of erosion and sedimentation, especially given the proximity of the proposed project to the onsite wetlands and the watercourse system. The Council notes that certain E&S control products have been found to entangle wildlife, including reptiles, amphibians, birds and small mammals. Given the potential presence of eastern box turtles in the project area, the Council recommends that the Petitioner avoid/minimize the use of E&S control measures that are made of plastic and/or have the potential for wildlife entanglement.

#### 3. Groundwater and Spill Prevention

The Petitioner states that the proposed site falls within an area classified with ‘GA’ groundwater

Keith Ainsworth  
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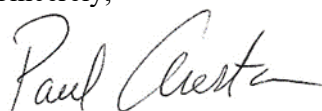
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Paul Aresta  
Executive Director

quality, and that the Connecticut Department of Energy and Environmental Protection (DEEP) defines “GA” groundwater to mean, “existing private and potential public or private supplies of water suitable for drinking without treatment”. While Appendix A- Figures depict the proposed site to be outside of an Aquifer Protection Area or Drinking Water Watershed, the majority of the proposed site and the area to the east are outside of a “Service Areas of Community Water Systems” and therefore, might rely on private wells for drinking water. Consequently, the Council recommends that the Petitioner develop and implement a spill prevention plan during construction to minimize potential impacts on groundwater resources.

The Council’s 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, flowing style.

Paul Aresta  
Executive Director