



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

### VIA ELECTRONIC MAIL

February 29, 2024

Melanie Bachman, Executive Director  
Connecticut Siting Council  
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PETITION NO. 1611 – LSE Scutum LLC and LSE Bootes LLC (Lodestar Energy) (Petitioner) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.93-megawatt AC solar photovoltaic electric generating facility located at 141 Town Farm Road, and Parcel Nos. 86-326 and 86-164, Abbe Road, Enfield, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1611.

### 1. Farmland Soils

The Petitioner states that, at the time of the wetland soil survey, “the site is currently cropland, planted with corn” and the “upland soils are mapped and noted as Prime Farmland soil by the NRCS”<sup>1</sup>. 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. Although the proposed project does not require a determination from the Connecticut Department of Agriculture (DOAG) regarding the material affect of the proposed solar project on prime farmland soils<sup>2</sup>, the Council recommends that the Petitioner develop and implement an agricultural co-use plan for the proposed site. In addition, the Council recommends that the Petitioner survey the depth of topsoil in the areas where topsoil stripping is proposed, retain all topsoil on the proposed sites, and 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 notes on the Array Site Plan (Sheet 4 of 7) that white spruce (*Picea Glauca*) would be planted along the west and south borders of the proposed site(s). The Council supports efforts to minimize any potential visual impact associated with the proposed facility. The Council questions if the Petitioner assessed the visibility of the proposed solar arrays from nearby properties, including, but not limited to, views looking west along Town Farm Road to determine the adequacy of the proposed vegetative screening and to determine if additional vegetative screening is required along portions of the proposed site’s eastern border.

### 3. Noise

The Petitioner notes that the proposed project design includes the installation of eight (8) inverters and one (1) transformer that would be located on the southern equipment pad

<sup>1</sup> NRCS = National Resources Conservation Service

<sup>2</sup> Connecticut General Statutes 16-50k (a)(iii)

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approximately 35 feet from the eastern property boundary and that the predicted noise level would equal to 61 dBA, which is the daytime noise limit for a Class A/residential receptor.<sup>3</sup> The Council recommends that the Petitioner conduct a post-construction noise survey, during the day at full operation, to confirm that the cumulative noise generated by the proposed facility's equipment would not exceed the applicable noise standard at the property boundaries.

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

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<sup>3</sup> Enfield Town Council Ordinance Chapter 6A – NOISE and Regulations of Connecticut State Agencies Section 22a-69-3.5.