



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

March 27, 2024

Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
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PETITION NO. 1622 – C-Tec Solar, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.66-megawatt AC solar photovoltaic electric generating facility and associated equipment to be located at 186 Foster Street, South Windsor, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1622.

1. Farmland Soils

The Petitioner notes that approximately 9.52 acres of the proposed site contain Prime Farmland Soils with approximately 4.56 acres located within the project area. 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 soils¹, the Council recommends that the Petitioner develop and implement an agricultural co-use plan for the proposed site. The Council also recommends that best practices be employed 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 “portions of the Facility are predicted to be visible from the immediately surrounding area to the north and west as well as over open fields to the south” and that “visibility in these areas will be primarily seasonal, when the leaves are off the deciduous trees”. The Petitioner also states that “excavation and regrading activities are necessary, along with some tree removal, within areas mapped as Prime Farmland Soils to facilitate Project development”. The Council recommends that the Petitioner limit tree removal/trimming, especially along the northern edge of the proposed site, to minimize any potential visual impacts to the nearby residential properties.

3. Groundwater and Spill Prevention

The Petitioner states that the proposed site falls within an area classified with ‘GA’ groundwater quality, and the Connecticut Department of Energy and Environmental Protection (DEEP) defines “GA” groundwater to mean, “existing private and potential public or private supplies of

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water suitable for drinking without treatment”. Although the contractor notes on the Sediment & Erosion Control Notes (Sheet EC-1) that “the contractor shall take all necessary precautions to avoid the spillage of fuel or other pollutants on the construction site and shall adhere to all applicable policies and regulations related to spill prevention and response/containment”, the Council recommends that the Petitioner develop and implement a spill prevention plan for construction of the proposed facility, with specific procedures and contact information, as a precaution 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

¹ Connecticut General Statutes 16-50k (a)(iii)