



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

November 19, 2025

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PETITION NO. 1695 – LSE Phobos LLC (Lodestar Energy) (Petitioner) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 4.05-megawatt AC solar photovoltaic electric generating facility and associated equipment located at 166 South Street, Morris, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) supports the development of clean energy facilities on appropriate sites in Connecticut. The Council offers the following comments regarding Petition 1695.

Farmland

The Petitioner notes that the proposed project area would occupy approximately 20 acres, and that Prime Farmland Soils account for approximately 14.9 acres and Statewide Important Farmland Soils account for approximately 4.9 acres. 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 agricultural land has cumulative regional economic and ecological implications. And although the Petitioner has proposed sheep grazing as an "agrivoltaics" activity for the proposed project, **the Council does not support the use of "important farmlands"¹ for commercial (front of the meter) energy projects.** However, if approved, the Council recommends that the Petitioner 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 as a condition of approval.

Vegetation and Core Forest

The Petitioner notes that the proposed project would result in the conversion of approximately two acres of successional shrubland and approximately four acres of deciduous woodland, including 1.3 acres designated as "core forest", to maintained grassland for the proposed energy facility. Shrublands and old fields are critical wildlife habitats that are essential for the survival of many wildlife species.² Further, the petition materials note that "core forests provide habitat for many species of wildlife that cannot tolerate significant disturbance and 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." While the 2015 forest fragmentation map³ identifies the area on the western edge of the proposed site as "edge forest", the removal of this vegetation indirectly impacts core forest. Consequently, **the Council does not support the proposed removal of trees and reduction of important habitat and core forest.**

Wetlands and Watercourses

The Petitioner notes that two inland wetland systems and a watercourse are present on the proposed site, including Wetland 2 (W2) and East Spring Brook, which is a Class AA watercourse, that extend North to South through the eastern portion of the property. The Petitioner states that “the proposed project will unavoidably create temporary disturbance of East Spring Brook and associated wetlands in the southern portion of the property to provide access to the project site” and that “a 14 foot wide by 117’ foot long engineered timber bridge on timber pilings” would be installed to cross the existing stream and wetland system. The Council notes that the proposed impacts on the existing stream and wetland system are avoidable, and **the Council suggests that the Petitioner assess the possibility of accessing the proposed site without impacting the existing watercourse and wetland system.**

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, appearing to read "Paul Aresta", with a stylized flourish at the end.

Paul Aresta
Executive Director

¹ Important farmlands consist of prime farmland, unique farmland, and farmland of statewide or local importance.

² The Northeast Upland Habitat Technical Committee, *Managing Grasslands, Shrublands, and Young Forest Habitats for Wildlife: A Guide for the Northeast*, 2006; https://portal.ct.gov/-/media/deep/wildlife/pdf_files/habitat/grassland_shrubland_management/prefacepdf.pdf

³ University of Connecticut, Center for Land Use Education and Research, CT 2015 Forest Fragmentation