



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

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PETITION NO. 1658 – VFS, LLC (Petitioner) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of an 850-kilowatt AC battery energy storage facility and associated equipment to be located at the University of Connecticut Depot Campus, 44 Weaver Road, Storrs (Mansfield), Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1658.

1. Environmental Information

The Council notes that the materials submitted in connection with the subject Petition failed to include certain information that would assist the Council and the Siting Council to review the potential environmental impacts of the proposed project. The Council recommends that the Petitioner provide more information regarding the proposed project including, but not limited to:

- provisions for erosion and sedimentation control;
- provisions for stormwater management;
- provisions for spill prevention, operations and management, emergency response, and maintenance;
- distance and direction to surface water features and wetlands;
- groundwater resources, and the presence of aquifer protection areas and/or public water supply watershed land proximate to the proposed site; and
- potential presence of any state-listed and federally-listed species;

2. Wildlife

The Petitioner states that “according to the relevant portion of the CT DEEP Mansfield Natural Diverse (sic) Database Areas Map (See attachments #3), the proposed Site is not located within the Natural Diversity Data Base Areas”. However, the proposed site location identified in attachment 3 is incorrect, and consistent with the proposed site plan (attachment 1), the proposed site is located in a Connecticut Department of Energy and Environmental Protection Natural Diversity Database (NDDB) buffer area. The Council recommends that the Petitioner consult with NDDB and undertake a review of the proposed project at the proposed site to eliminate any adverse impacts on state-listed species.

The Council also notes that the proposed project location is incorrectly identified on the FIRM Map (attachment 10).

3. Cultural Resources

The Petitioner states that “the proposed Facility will be located in an already developed vicinity, consequently construction and operation of the Fuel Cell (*sic*) will have no unpleasant effect on any cultural (historical and archaeological) resources in the area”. The Council notes that the Connecticut State Historic Preservation Office (SHPO) online viewer of Connecticut’s cultural resources inventory (ConnCRIS) identifies several historic buildings located near the proposed site. The Council recommends that the Petitioner consult with the SHPO to confirm that the proposed project would have no adverse impacts on historic/cultural resources.

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,



Paul Aresta
Executive Director