



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

### VIA ELECTRONIC MAIL

September 24, 2025

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. 1688 – Greenskies Clean Energy, LLC (Petitioner) petition for a declaratory ruling for the construction, maintenance and operation of a 1.2-megawatt AC solar photovoltaic electric generating facility and associated equipment located at 81 and 93 Lake Street, Manchester, 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 1688.

#### Visibility

The Petitioner states that the facility will be most visible from the south, in particular the residence at 90 Lake Street, and the abutting parcels to the east, 109 and 119 Lake Street. The Petitioner proposes to “use an agricultural style fence which is a generally more visually appealing option than chain-link fence.” Based on the photo simulations in Appendix H, the Council suggests that the Petitioner develop a plan to minimize the visual impact of the proposed facility from residents located south and east of the proposed site.

#### Noise

In Appendix L - Noise, the Petitioner states that their “analysis determined that expected sound from the project are compliant with the applicable Town of Manchester and State of Connecticut and/or noise regulations.” However, the models represented in both Table 3-2 and Table 3-3 show the receptor “Location A” as having a “Calculated A-Weighted Sound Level with 5-dBA Tonal Penalty” measuring 58.8 dBA and 59.1 dBA, respectively. Further, the noise study states that “sound levels at Location A exceed 55 dBA, but that condition could be mitigated with a local noise wall.” It is unclear if Location A would be subject to the applicable noise standards, and if so, the Council recommends that the Petitioner ensure that the proposed facility complies with the applicable noise regulations and provide details regarding any sound mitigation measures that would be necessary to mitigate the impact of the proposed noise generating equipment.

#### Groundwater, Public Water Supply, and Spill Prevention

The Council notes that according to the Connecticut Department of Public Health’s (DPH) “Public Water Supply Mapping Application”<sup>1</sup> and Connecticut Department of Energy and Environmental Protection’s (DEEP) “Water Quality Classifications Manchester”<sup>2</sup>, the proposed site lies within an area designated as “Drinking Water Watersheds” and within an area with a

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Paul Aresta  
*Executive Director*

Groundwater Quality Classification of GAA, which is designated for future or current use as a drinking water supply without treatment. Although the Petitioner details certain provisions for the storage of flammable liquids, placement of spill kits in all vehicles and equipment on-site, and chemical use monitoring, the Council recommends that the Petitioner review and incorporate the protective measures identified in the DPH's "General Construction Best Management Practices for Sites within a Public Drinking Water Supply Area" guidance document.<sup>3</sup> Further, the Council recommends that the Petitioner require that all refueling and/or servicing of vehicles and machinery be done on an impervious surface located at least 100 feet from any wetlands or watercourses, and that the project plans specify spill prevention, containment and reporting procedures.

### **Wetlands**

According to Appendix A- Sheet SE-2 "Sediment & Erosion Control Plan", several solar photovoltaic panels are proposed to be installed within 100 feet of the wetland located north and downgradient of the proposed facility. This action would potentially be inconsistent with the Connecticut's General Permit for the Discharge of Stormwater from Construction Activities, Appendix I, which states "no solar panel associated with a solar array shall be located within one-hundred (100) feet of any wetland or waters ("the 100-foot setback") that, prior to or after construction, is located downgradient of such construction activity..."<sup>4</sup> The Council recommends that the Petitioner comply with the requirements of DEEP's General Permit and maintain a 100-foot buffer to better protect the wetlands from sedimentation.

### **Prime Farmland Soil**

The Petitioner notes that "approximately 6.5 acres of soils classified as prime farmland soils are within the footprint of the proposed Facility." The Council recommends that the Petitioner incorporate agrivoltaic practices and low-impact development to enable agricultural co-use including, but not limited to, installing the solar panels higher above the ground and spaced farther apart than conventional systems to allow in enough sunlight to grow crops for harvesting or grazing. In addition, the Council recommends that best practices be employed during construction that might allow for the future restoration of farmland soils to more productive agricultural use by retaining the topsoil on the proposed site and minimizing grading, trenching, and compaction of farmland soils.

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,



Paul Aresta  
Executive Director

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<sup>1</sup>Connecticut Department of Public Health - Public Water Supply Mapping Application; Public Drinking Water Map Viewer  
<https://maps.ct.gov/portal/apps/experiencebuilder/experience/?id=1a8bf90b37b24affaeb41a41d71c9417&draft=true>

<sup>2</sup> Connecticut Department of Energy and Environmental Protection - Water Quality Classifications Manchester;  
[https://cteco.uconn.edu/maps/town/wtrqualcl/WtrQualCl\\_Manchester.pdf](https://cteco.uconn.edu/maps/town/wtrqualcl/WtrQualCl_Manchester.pdf)

<sup>3</sup> Connecticut Department of Public Health - General Construction Best Management Practices for Sites within a Public Drinking Water Supply Area; [https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/dph/drinking\\_water/pdf/BMPFactSheetpdf.pdf](https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/dph/drinking_water/pdf/BMPFactSheetpdf.pdf)

<sup>4</sup>Connecticut Department of Energy and Environmental Protection- General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities- Appendix I (2)(a)(1); [https://portal.ct.gov/-/media/deep/permits\\_and\\_licenses/water\\_discharge\\_general\\_permits/stormconstgppdf.pdf?rev=b42fe03be3684302828d31a0410a335d&hash=8917ECA337CA46E08B6D4B322AAD6718](https://portal.ct.gov/-/media/deep/permits_and_licenses/water_discharge_general_permits/stormconstgppdf.pdf?rev=b42fe03be3684302828d31a0410a335d&hash=8917ECA337CA46E08B6D4B322AAD6718)