

COUNCIL ON ENVIRONMENTAL QUALITY



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VIA ELECTRONIC MAIL

August 26, 2026

Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
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Re: Petition No. 1714 – Greenskies Clean Energy 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 a 3.0-megawatt AC solar photovoltaic electric generating facility located on Old Velvet Street in North Haven, Connecticut

Dear Attorney Bachman:

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1714:

Wildlife

The Petitioner states that “A Request for NDDB State Listed Species Review was submitted to CT DEEP Wildlife Division. A Final Determination dated January 23, 2026 states that the Northern Long-Eared Bat (*Myotis septentrionalis*), Tri-Colored Bat (*Perimyotis subflavus*), and Wood Turtle (*Glyptemys insculpta*) have been documented within or near the Project Area and provides applicable best management practices for the species.” The Council notes that the “Wildlife Protection” measures (for wood turtle) identified on the Civil Site Plan, Sheet C.4.0 states that “all work can be performed between April 1 and October 31 during the active season of the species” and that if work is conducted outside of these limits, the contractor should take a number of precautions. However, the NDDB Determination letter states that “land disturbance and excavation confined to the upland can be done without risk for impact to wood turtle if work is restricted to the dormant season (November 1-March 31)” and that “to prevent turtle access and entry into your upland work zone between April 1- October 31” certain precautions should be undertaken to protect wood turtle. The Council recommends that the Petitioner adhere to the best management practices (BMPs) documented in the NDDB Determination letter dated January 23, 2026, and that these BMPs are accurately incorporated into the project plans. Additionally, the Council recommends the Petitioner consult a qualified herpetologist to survey the proposed site for evidence of turtle nesting sites, to provide training to the contractors, and to ensure that the recommended protection measures for wood turtle are adhered to. The Council notes that plastic netting used in a variety of erosion control products has been found to entangle wildlife, including reptiles, amphibians, birds and small mammals. The Council recommends that the Petitioner use erosion control products that avoid/minimize the potential for wildlife entanglement.

Farmland Soils

The Petitioner states that “the site is currently used for agriculture, such as tomatoes and strawberries. A review of the USDA’s soil mapping for the area indicates that the Project site will be placed on approximately 9.7 acres of prime farmland.” The Petitioner also notes that the Department of Agriculture (DoAG) issued a determination that the proposed project “will not materially affect the status of project land as prime farmland.” 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. The Council recommends that the Petitioner employs best practices during construction that might allow for the future restoration of farmland soils to more productive agricultural use by minimizing grading, trenching, and compaction of farmland soils.

Drinking Water and Spill Prevention

The Council notes that the proposed project is within a GA groundwater classification, which, according to the DEEP Water Quality Standards, is designated for “existing private and potential public or private supplies of water suitable for drinking without treatment.” Further, the Council notes that private drinking water wells serve adjacent properties. The Council supports the Petitioner’s efforts to reduce the likelihood of releases to the environment including, but not limited to, storing all flammable liquids in code-compliant cabinets and containers, making spill kits available, and monitoring daily chemical usage. The Council recommends that the Petitioner ensure that all chemical and petroleum product containers on site, except for those contained in vehicles and equipment, be stored on impervious surfaces with secondary containment capable of holding 110 percent of the volume of the largest container and that all refueling occurs on impervious surfaces that are at least 100 feet away from any wetland or watercourse.

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", written in a cursive style.

Paul Aresta
Executive Director