STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
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VIA ELECTRONIC MAIL

June 30, 2023

TO: Service List, dated March 8, 2023

FROM: Melanie Bachman, Executive Director MPB

RE: **DOCKET NO. 514** – Glenvale, LLC d/b/a Glenvale Solar application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 4.0-megawatt-AC solar photovoltaic electric generating facility located at 56 River Road, Putnam, Connecticut and associated electrical interconnection

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Comments have been received from the Department of Energy and Environmental Protection on June 29, 2023. A copy of the comments is attached for your review.

MB/RDM/laf

c: Council Members

June 29, 2023

Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: 4.0-MW Photovoltaic Generating Facility
Glenvale Solar
Putnam, Connecticut
Docket No. 514

Dear Members of the Connecticut Siting Council:

Staff of this department have reviewed the above-referenced application for a Certificate of Environmental Compatibility and Public Need for a 4-MW photovoltaic generating facility at 56 River Road in Putnam. The facility will occupy 16.93 acres of a 31.39-acre parcel on the east side of River Road. In addition, a field review of the site was conducted on June 14, 2023. Based on these efforts, the following comments are offered to the Council for your consideration in this proceeding.

DEEP notes that the construction of facilities such as that proposed in this application will aid in the achievement of Connecticut's vision for a more affordable, cleaner, and more reliable energy future for the ratepayers of Connecticut. Bringing more zero carbon energy projects on line is instrumental in furthering this vision as these resources help diversify the regional fuel mix**,** and they aid in achieving a 100% zero-carbon electric sector by 2040 as required by Connecticut General Statutes Sec. 22a-200a(a)(3). Developing grid-scale renewables is also imperative to the state's success in achieving its statutory goal of reducing carbon emissions generally by 45% below 2001 levels by 2030 and by 80% below 2001 levels by 2050.

Site Description

The host site for the proposed solar facility consists of primarily mixed forest of white pine and oak, with a 3-acre cornfield in the northwestern corner of the site. Slopes on the site are flat to very gentle, so that sedimentation and erosion concerns can likely be easily addressed and mitigated. The wooded portion of the site shows ample evidence of previous logging activity. A network of woods roads, overgrown to various degrees, crosses the site with larger canopy openings at some intersections of these roads. The largest open area, in the south central portion of the site, may have been a logging yard from a previous timber harvest.

As noted in the Environmental Assessment (Exhibit G), white pine are more dominant in the northern/northeastern portion of the site while more of a mixture of red oak, black oak and white pine is found in the southern portion of the parcel. Tree size classes reflect the previous logging activity. In the northeastern portion of the site, the largest white pine are 16" diameter breast height (dbh), while the largest oaks at 12" dbh. Trees are somewhat larger in the southern portion of the site, with white pine up to 24" dbh. Dense fern cover dominates the forest floor in the southern half of the site, ranging from thigh high to waist high and is sufficiently dense so as to obscure remnant logs and slash on the forest floor.

An Eversource right-of-way, hosting either a low voltage transmission line or a distribution line, runs along the eastern edge of the project area. West of the project site, along the west side of River Road, is another cornfield comparable to that on the project parcel, and wooded areas north and south of that cornfield.

The nearest home to the project site is immediately adjacent to it at 24 River Road, just north of the host parcel. (This home is erroneously cited as being at 34 River Road on page 33 of Exhibit G.) Hopefully the three large black walnut trees on the rear of this property, two of which appear to be close to the host property boundary, will not be affected by the proposed project.

Noise Impacts

The inverters of a solar facility create noise which can be intrusive to homes located in substantially close proximity. The residence at 24 River Road, which appears to contain two apartments, is in very close proximity to the property boundary as shown on Figures 4, 5, 6, and 7 of Exhibit G. Some form of noise mitigation, be it a partial enclosure of the medium voltage power station (MVPS) discussed on page 33 as containing the transformers and inverters, would be appropriate. At a minimum, the privacy slats proposed for inclusion in the perimeter fence along River Road would provide some mitigation if also incorporated in the perimeter fence adjacent to 24 River Road, but a more substantial sound barrier or enclosure would be more appropriate. Noise from the inverters was found to be very apparent at the houses along Middle Road in East Windsor from the inverters at the East Windsor Solar One facility, the subject of Petition No. 1426, which was visited after the field review for Petition No. 1558, in Ellington.

This discussion of noise impacts on page 33 of Exhibit G is confusing in its citation of the property at 16 River Road as being the most noise susceptible home from the MVSP. While the northern property line of the host property is not straight, the home at 16 River Road is much farther from the access road and MVPS than either the homes at 24 or 20 River Road. These latter two homes would appear to be much more vulnerable noise receptors than the cited home at 16 River Road.

Construction Stormwater Management

Construction projects involving five or more acres of land disturbance, including this one, either require an individual NPDES discharge permit from DEEP or may register for coverage under the DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (DEEP-WPED-GP-015). As of June 16, we have no record that Glenvale Solar has submitted a registration under the General Permit.

Miscellaneous Petition Commentary

No impact to the Air Line Trail State Park would be anticipated from the proposed Glenvale facility.

Exhibit G contains the January 25, 2022 letter from DEEP's Natural Diversity Data Base program and the May 25, 2022 letter from DEEP State Forester Christopher Martin. The former cites a determination of no anticipated negative impacts to any State-listed species, while also suggesting plans for vegetation management and wildlife movement. The latter includes a finding that the proposed facility will not materially affect core forest at the site.

Lastly, the application contemplates vegetative plantings for visual screening. As mentioned in DEEP's comments for Petition No. 1558, such plantings require follow-up maintenance. The Council should consider a requirement to replace any dead landscaping plantings for perhaps a period of five years after project completion. Such plantings not only serve as visual screening but also mitigate inverter noise in cases where there are nearby residences.

Thank you for the opportunity to review this application and to submit these comments to the Council. Should you, other Council members or Council staff have any questions, please feel free to contact me at (860) 424-4110 or at frederick.riese@ct.gov.

Respectfully yours,

Frederick L. Riese
Senior Environmental Analyst

CC: Katie Dykes, Commissioner