

CONNECTICUT SITING COUNCIL

DOCKET NO. 550

Brookfield Husky Solar, LLC d/b/a Verogy

Application for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance, and Operation of a 50-Megawatt AC Solar Photovoltaic Electric Generating Facility and Associated Equipment in Sterling and Plainfield, Connecticut

PRE-FILED TESTIMONY OF MATTHEW KONOW

I, Matthew Konow, submit the following testimony in Docket No. 550.

I. BACKGROUND

1. My name is Matthew Konow.
2. I am the owner of property located at 436 Sterling Hill Road, Moosup, Connecticut 06354.
3. My property abuts or is immediately adjacent to lands associated with the proposed Brookfield Husky Solar facility.
4. I am familiar with the area surrounding the proposed project through my ownership, residence, and regular observation of the property and surrounding lands.

II. PURPOSE OF TESTIMONY

5. The purpose of this testimony is to provide information concerning environmental resources located within and adjacent to the proposed project area, including wildlife habitat, bat utilization of the area, groundwater resources, and concerns regarding the environmental compatibility of the proposed facility.

III. REVIEW OF APPLICATION MATERIALS

6. I have reviewed portions of the application and supporting materials filed by the applicant, including materials relating to wetlands, vernal pools, wildlife habitat, Natural Diversity Data Base (NDDDB) resources, and comments submitted by the Connecticut Department of Energy and Environmental Protection (DEEP).
7. Based on my review of those materials, the project area contains or is located in proximity to wetlands, forested habitat, wildlife travel corridors, vernal pools, and other natural resources that contribute to the ecological value of the area.
8. I understand that DEEP's comments state that the NDDDB determination identified state-listed amphibians, reptiles, bats, and freshwater mussels as potentially present at or near the project site.
9. I understand that DEEP's comments indicate that the NDDDB program requested additional surveys for the Bellavance property and requested that survey information

from the Corson, Sugar Brook, and Bellavance properties be submitted together before NDDB can provide a final holistic determination regarding the project area.

9A. Attached as Exhibit MK-3 are excerpts from comments submitted by the Connecticut Department of Energy and Environmental Protection in this proceeding regarding NDDB resources, state-listed species, additional survey requests, vernal pools, wildlife connectivity, and core forest impacts associated with the proposed project.

IV. BAT OBSERVATIONS

10. I have personally observed bats utilizing habitat within and around the proposed project area on multiple occasions over several years.
11. My observations have occurred in the vicinity of forested areas, wetlands, vernal pools, and other habitats associated with the proposed development site.
12. Attached as Exhibit MK-1 is a photograph depicting a bat observed at 436 Sterling Hill Road, Moosup, Connecticut, in the vicinity of the proposed project area.
13. Exhibit MK-1 was photographed by my wife, Kaylie Konow, at 436 Sterling Hill Road on July 31, 2020.
14. The photograph fairly and accurately depicts the bat that was observed at that time and location.
15. I offer Exhibit MK-1 to document bat presence at 436 Sterling Hill Road and within habitat located on or adjacent to the proposed development site.
16. Attached as Exhibit MK-2 is a location map depicting my property at 436 Sterling Hill Road, Moosup, Connecticut, where the bat depicted in Exhibit MK-1 was observed, in relation to the proposed Brookfield Husky Solar project area.
17. In addition to the bat depicted in Exhibit MK-1, I have personally observed bats in the vicinity of the proposed project area on other occasions, including observations occurring as recently as 2026.
18. I am not offering an expert opinion regarding the species of bat depicted in Exhibit MK-1 or any other bats observed in the area. However, because DEEP has stated that the NDDB determination identified state-listed bats as potentially present at or near the project site, the bat depicted in Exhibit MK-1 may represent a protected species or other bat species utilizing habitat within the project area. This possibility supports the need for additional site-specific evaluation of bat resources before environmental impacts associated with the proposed facility are fully assessed.

V. CONCERNS REGARDING EVALUATION OF BAT RESOURCES

19. Based upon my review of the application materials and DEEP comments filed in this proceeding, I understand that additional surveys have been requested as part of the NDDB review process and that a final holistic determination for all three project areas had not been completed at the time of DEEP's filing.
20. I am not aware of any project-specific acoustic monitoring, mist-netting surveys, roost surveys, or similar field investigations that have been completed and made part of the record to evaluate the extent of bat utilization within the project area.

21. Given DEEP's statement that the NDDB determination identified state-listed bats as potentially present at or near the project site, and given the ongoing NDDB review process, I believe additional site-specific evaluation of bat resources would provide important information regarding the potential environmental effects of the proposed project.

21A. DEEP further reported that the NDDB program requested additional surveys for the Bellavance property and that a combined survey report for the Corson, Sugar Brook, and Bellavance properties had not yet been submitted at the time of DEEP's review. DEEP stated that NDDB could not continue its review process and provide a final holistic determination until that information was submitted and reviewed.

22. In my view, the proposed clearing of approximately 45 acres of core forest and associated site alterations warrant further assessment of potential impacts to bats and other wildlife resources before a determination is made regarding environmental compatibility.

23. DEEP's comments note that the applicant requested a core forest determination and was advised by DEEP Forestry that the proposed project would have a material impact on core forest. Forested habitat and wildlife travel corridors are important ecological resources that may support bat foraging, movement, and other wildlife functions.

24. The project area contains forested habitat, wetlands, vernal pools, and associated wildlife corridors that may provide habitat and foraging opportunities for bat species and other wildlife.

24A. DEEP reported that the project properties contain numerous vernal pools and recommended protective measures associated with activities occurring within vernal pool envelopes. The presence of these resources further demonstrates the ecological significance of the project area.

24B. DEEP also noted during the pre-application process that perimeter fencing specifications should maintain a gap at the bottom to allow for small wildlife crossings. This recommendation reflects the importance of maintaining wildlife movement and habitat connectivity throughout the project area.

24C. The documented presence of bats within the vicinity of the proposed project area, together with DEEP's statement that state-listed bats may be present at or near the site and the ongoing NDDB review process, demonstrates that additional information regarding bat utilization of the project area remains relevant to the Council's evaluation of environmental compatibility. Because the proposed project includes extensive forest clearing and habitat alteration, I believe a complete understanding of bat resources and habitat use should be developed before a final determination is made.

VI. ADDITIONAL ENVIRONMENTAL CONCERNS

25. As an abutting property owner, I am concerned regarding potential impacts to wetlands and associated ecological functions.

26. I am concerned regarding potential impacts to groundwater recharge areas and hydrologic resources.

26A. As a property owner who relies on groundwater resources, I am concerned regarding the potential effects of the proposed facility on groundwater recharge and local hydrology. Published research indicates that utility-scale solar facilities can alter site hydrology, including runoff patterns, soil moisture distribution, and infiltration characteristics. While the extent of any effect on groundwater resources may be site-specific, I believe additional evaluation of potential impacts to groundwater recharge and nearby residential wells is warranted given the size of the proposed project and the extent of land disturbance and forest clearing associated with its construction.

26B. My concern is heightened by the presence of wetlands, vernal pools, forested lands, and other natural resources within and adjacent to the project area that contribute to the area's existing hydrologic functions. Any substantial alteration of these resources has the potential to affect water movement, infiltration, and groundwater recharge patterns.

26C. I respectfully request that the Council consider whether sufficient information has been provided to evaluate potential effects on groundwater recharge and neighboring residential wells before determining that the proposed facility is environmentally compatible.

27. I am concerned regarding fragmentation of wildlife habitat and disruption of habitat connectivity between forested areas, wetlands, vernal pools, and other natural resources located within and adjacent to the project area.

28. I am concerned regarding the potential effects of extensive forest clearing, including impacts to approximately 45 acres of core forest identified in DEEP's comments.

29. I am concerned regarding the potential effect of the proposed facility on the visual character of the area and on the use and enjoyment of neighboring residential properties.

29A. As an abutting property owner, I have observed the area over many years and have witnessed regular use of the surrounding forest, wetland, and edge habitats by wildlife. These observations reinforce my concern that the proposed project may affect ecological resources that have not yet been fully evaluated through the ongoing NDDB review process.

VI.A. POTENTIAL IMPACTS TO ADJACENT RESIDENTIAL PROPERTIES

29B. As an abutting property owner, I am concerned that the proposed facility may adversely affect the marketability and value of nearby residential properties due to its size, visibility, extensive forest clearing, and change in the existing rural character of the area.

29C. I understand that published research has evaluated property values in proximity to utility-scale solar facilities. While findings vary by location and project characteristics, some studies have reported measurable reductions in residential property values for certain homes located near large-scale solar developments, while other studies have found little or no measurable impact.

29D. I recognize that property-value impacts are site-specific and may depend upon factors such as proximity, visibility, screening, project design, and local market conditions. Nevertheless, because my property directly abuts or is located in close proximity to the proposed project, I remain concerned regarding potential effects on the value, marketability, and enjoyment of my property.

29E. In addition to potential economic impacts, I am concerned that the proposed facility may alter the visual character of the surrounding area through extensive forest clearing, the introduction of industrial-scale infrastructure, and changes to the existing landscape that currently contributes to the residential and rural character of the neighborhood.

29F. I respectfully request that the Council consider the potential effects of the proposed facility on neighboring residential properties, including impacts to visual character, marketability, and property values, when evaluating environmental compatibility and public need.

VII. CONCLUSION

30. Based upon my review of the application materials, DEEP comments, published research, and my personal observations of the area, I respectfully request that the Council carefully consider the potential impacts of the proposed project on bat resources, wildlife habitat, wetlands, vernal pools, groundwater recharge, residential wells, groundwater resources, core forest, adjacent residential properties, and the rural character of the surrounding area.
31. I further request that the Council consider whether additional site-specific investigation of bat resources and other environmental resources is warranted before determining whether the proposed facility satisfies the environmental compatibility requirements of Connecticut General Statutes § 16-50k.
32. I respectfully request that the Council consider the information contained in Exhibits MK-1, MK-2, and MK-3 the documented presence of bats in the vicinity of the proposed project area, my observations of continued bat activity through 2026, DEEP's statements regarding the potential presence of state-listed bats and other protected species, the ongoing NDDB review process, the identified impacts to core forest resources, and

potential impacts to neighboring residential properties when evaluating the environmental compatibility of the proposed facility.

I affirm that the foregoing testimony is true and accurate to the best of my knowledge and belief.

Respectfully submitted,

Matthew Konow

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Dated: May 31, 2026

CERTIFICATE OF SERVICE: I hereby certify that a copy of the foregoing Motion for Reconsideration of Grant of Intervenor Status, Request for Party Status, and Request for Continuance in Docket No. 550 was served electronically on all persons listed on the official Service List for this proceeding on this 31 day of May, 2026.

EXHIBITS

Exhibit MK-1 – Photograph of Bat Observed at 436 Sterling Hill Road

Description: Photograph taken by Kaylie Konow on July 31, 2020, at 436 Sterling Hill Road, Moosup, Connecticut, depicting a bat observed on the property in the vicinity of the proposed Brookfield Husky Solar project area. The exhibit is offered to document bat presence at 436 Sterling Hill Road and within habitat located on or adjacent to the proposed development site. While the species depicted in this photograph has not been identified by a qualified expert, the observed bat may represent a protected bat species or other bat species utilizing habitat associated with the project area. Subsequent observations of bats by Matthew Konow have occurred in the area through 2026.

Exhibit MK-2 – Location Map of Bat Observation and Proposed Project Area

Description: Map depicting the location of 436 Sterling Hill Road, Moosup, Connecticut, where the bat shown in Exhibit MK-1 was observed, in relation to the proposed Brookfield Husky Solar project area. The exhibit is offered to demonstrate the proximity of a documented bat observation to the proposed development areas and associated habitat resources, including forested habitat, wetlands, vernal pools, and wildlife corridors.

Exhibit MK-3 – Excerpts from Connecticut Department of Energy and Environmental Protection Comments Regarding Natural Diversity Data Base Resources, State-Listed Species, Additional Survey Requests, Vernal Pools, Wildlife Connectivity, and Core Forest Impacts

Description: Exhibit MK-3 consists of excerpts from DEEP comments documenting state-listed species potentially present at or near the site, requested NDDDB surveys, ongoing NDDDB review, vernal pool resources, wildlife connectivity recommendations, approximately 45 acres of proposed core forest clearing, and DEEP Forestry's determination that the project would have a material impact on core forest resources.