



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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VIA ELECTRONIC MAIL

March 8, 2021

Carol Bramley
Chair, Litchfield Planning & Zoning Commission
Town Office Building
74 West Street
Litchfield, CT 06759
cbram@optonline.net

RE: **PETITION NO. 1442** - SR Litchfield, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 19.8-megawatt AC solar photovoltaic electric generating facility on 6 contiguous parcels located both east and west of Wilson Road south of the intersection with Litchfield Town Farm Road in Litchfield, Connecticut, and both east and west of Rossi Road, south of the intersection with Highland Avenue in Torrington, Connecticut, and associated electrical interconnection.

Dear Ms. Bramley:

The Connecticut Siting Council (Council) is in receipt of the Town of Litchfield Planning & Zoning Commission's correspondence dated March 7, 2021, concerning the above-referenced petition. Thank you for taking the time to provide the Council with your comments.

This petition will be placed on a future Council meeting agenda for discussion and decision. Please note that you can view all of the documents related to this petition on our website at portal.ct.gov/csc under the "Pending Matters" link. You may also keep apprised of Council events on the website calendar and agenda.

Before reaching a final decision on a petition, the Council carefully considers all of the facts contained in the record that is developed by the Council, the petitioner, parties and intervenors to the petition, and all of the concerns received from members of the public who submit written statements to the Council.

Your comments shall become part of the official record in this matter in the form of a limited appearance defined under subsection (f) of Connecticut General Statutes §16-50n. Copies of your correspondence will be distributed to the petitioner and parties and intervenors to the petition.

Thank you for your interest and concern in this matter.

Sincerely,

s/Melanie A. Bachman

Melanie A. Bachman
Executive Director

MAB/lm

c: Service List dated February 8, 2021
Council Members

From: cbram@optonline.net
To: [CSC-DL Siting Council](mailto:CSC-DL_Siting_Council); KBALDWIN@rc.com; "1st Selectman"; "Dennis Tobin"; vmron@yahoo.com; "Steven Byrne"
Subject: Petition NO. 1442 SR Litchfield, LLC
Date: Sunday, March 7, 2021 3:47:36 PM

RE: PETITION NO. 1442 - SR Litchfield, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 19.8-megawatt AC solar photovoltaic electric generating facility on 6 contiguous parcels located both east and west of Wilson Road south of the intersection with Litchfield Town Farm Road in Litchfield, Connecticut, and both east and west of Rossi Road, south of the intersection with Highland Avenue in Torrington, Connecticut, and associated electrical interconnection.

Ms. Melanie Bachman
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

March 6, 2021

Dear Ms. Melanie A. Bachman,

The Planning and Zoning Commission of Litchfield acknowledges the receipt of Petition No. 1442 - SR Litchfield, LLC. Please note that receipt and review was delayed due to the email on record at the CSC for the First Selectwoman was incorrect further delaying receipt and our review of Petition No. 1442 – SR Litchfield, LLC.

After extensive review of the submissions of SR Ranch, LLC, the Planning and Zoning Commission, at its March 1, 2021 meeting, discussed the proposal requested the Chairman of the Commission submit comments, based on meeting discussion, related to the Petition NO.1442. The documents submitted to the Siting Council with the application for this proposed project are detailed and informative with regard to the two very diverse parcels of land within the Town of Litchfield. The Commission requests you consider the following areas of concern:

The westerly parcel, bordered by Town Farm Road and Wilson Road, has a long history of agricultural use. The State Plan of Conservation and Development, the Northwest Hills Council of Governments POCAD (2017) and Litchfield's POCAD (2017) note the importance of valuing farmland. The NHCOC Plan states "mid and large scale commercial solar installations be directed away from farm fields and core forests and toward brownfields and industrial sites." Town Farm Road is named for the farm designated the Town's Alms house/working farm and the fields and mid-19th century house remains standing south and west of the proposed solar site.

The extensive amount of required remodeling of the land in both Litchfield parcels require diligence in management and oversight with regard to drainage and erosion and sedimentation controls as the project is at the top of the ridge with a long downhill slope. The proposed properties are part of an A rated watershed and adjacent to a large westerly AA rated watershed. Although extensive drainage management techniques are proposed, the regrading of the land for construction and the extensive removal of trees and other soil retentive vegetation complicate long-term management, resulting in a major area of concern, particularly on the parcel east of Wilson Road that is currently forested and contains wetlands. Large scale use of herbicides to manage vegetation could have a long-term effect on drinking water for both residents and grazing livestock.

Litchfield's Zoning Regulations require a minimum building (structure) setback of 50 feet in the RR Zone and that setback is increased for non-residential development in a residential zones. The Visual Analysis Photo Location Map, Figure 6 – Observation Point Location Map, Page 6 of 14 illustrates a limit of disturbance that appears to go almost to the southerly property line east of Wilson Road and also appears to intersect the property line on the more northerly, south border of the property, both impacting the adjacent residential property owner. We respectfully request every effort be made to adjust these two locations to comply with at least the minimum setback required by Litchfield's Zoning Regulations and include retaining a vegetative visual buffer.

The Noise Impact Assessment, prepared by Urban Solution Group notes there will be 90 power inverters in the Litchfield project. Although the table of Predicted Sound Levels (Page 2) for each unit falls within the State levels permitted, there is no description of the cumulative noise levels and the impact of noise from multiple inverters, particularly those closest to residential properties. Existing noise levels in the area of the Litchfield development is limited to birds, leaves rustling in the wind and an occasional car. Maintaining a zoning required setback and natural vegetative buffer becomes more important and necessary to preserve health, residential property values and quality of life for those residents living in close proximity to the project.

The inverters, on a project the size of SR Litchfield, use high frequency choppers to step up the voltage and the high power transformers, which typically use oil to insulate the inverters, can with time, lead to failures in containment resulting in hazardous spills creating pollution impacting ground water quality. Another concern is the reflective power of the extensive number of panels and the impact of reflected sunlight on roads while driving and on adjacent residential properties.

The Planning and Zoning Commission of the Town of Litchfield appreciates the opportunity to present some of our concerns.

Respectfully,

Carol Bramley,
Chairman, Litchfield Planning and Zoning Commission