

State of Connecticut Siting Council

PETITION NO. 1598 – Windsor Solar One, 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 3.0-megawatt AC solar photovoltaic electric generating facility located at 445 River Street, Windsor, Connecticut, and associated electrical interconnection.

Post-Hearing Brief of Intervenor Leslie D Harrison

Intervenor Leslie D. Harrison respectfully requests the Council deny this Petition, thereby allowing the Petitioner the opportunity to search for a more viable location, away from residences, for this solar photovoltaic electric generating facility.

I have been a resident in the Town of Windsor, at this same address, for 38 years. I chose this location for my home, precisely because it was across the street from agriculture land and for the bucolic nature of the entire area.

While I am not at all opposed to the concept of seeking alternative energy sources, I am vehemently opposed to the siting of such alternative sources in an area that may potentially negatively impact many Town of Windsor Connecticut residents every day, for 35 years into the future.

As the name of your entity implies, the CT Siting Council has been delegated the responsibility of approving the **appropriate siting** of these types of solar photovoltaic electric generating facilities. Part of this responsibility, as documented in the About section of the CT Siting Council website (<https://portal.ct.gov/csc/common-elements/common-elements/connecticut-siting-council---description>) clearly states that the Council's responsibility requires "*balancing the need for adequate and reliable public utility services at the lowest reasonable cost to consumers with the need to protect the environment and ecology of the state and to minimize damage to scenic, historic, and recreational values*" as well as "*providing environmental standards for the location, design, construction, and operation of public utility facilities that are at least as stringent as federal environmental*

standards and that are sufficient to assure the welfare and protection of the people of Connecticut”.

As an Intervenor I have been an active participant in those areas of the process where I am allowed to participate. I have personally submitted interrogatories and I have read each response provided by the Petitioner to my interrogatories, as well as to the other interrogatories that have been submitted. I have attended every hearing and I have reviewed each document related to this Petition on the CT Siting Council website. I am very appreciative of the numerous modifications that Council has required the Petitioner make to their plan, but I still believe adamantly that approving this Petition will irreparably harm the scenic value of this environment and does not assure the welfare of the people of Connecticut that reside in proximity to this proposed site.

SOUND CONCERNS

Solar electric generation technology is relatively new and that is why there are no long-term studies that adequately prove that this technology does not cause harm to people and wildlife alike. I understand that the sound study that has already been conducted shows levels within statue range. I understand and appreciate that one of the modifications the Council will stipulate is that another sound study be conducted once the facility is completed. I would have expected that the Petitioner would have included that 2nd study as a normal course of building such a facility and would not need to have it mandated by the Council.

This same Petitioner assured the residents of East Windsor, CT that lived in close proximity to the last solar photovoltaic electric generating facility the Petitioner designed and constructed, and that the CT Siting Council approved, that they would be not be disturbed by any sound generation coming from that facility. Unfortunately, that has not been the case and to this day none of the attempts at sound mitigation have resolved this problem. These residents cannot open their windows or doors during the day, nor sit outside comfortably due to the sound generated from that facility. I do not want that same fate to similarly negatively impact the welfare of the Windsor residents that reside near this proposed facility, nor to the students from various Connecticut towns, some of whom have

disabilities, that attend two schools within a mile of this proposed facility. Despite Windsor Solor One assurances that it will not, this is a fact that will not be able to be ascertained until after the facility is built and at that point the damage will not be able to be undone.

The current layout of the panels orients the tracking motors in an east to west facing configuration, such that the noise produced by this equipment is emitted directly facing the bulk of the residents of the Strawberry Hills condominium complex. A request to change to a north to south oriented configuration was identified by the Petitioner as not being cost effective, despite the likelihood that such a configuration might help with noise mitigation.

SAFETY CONCERNS

The current plan allows the Petitioner the opportunity to select different equipment than is documented in Appendix B, should supply chain issues arise. There is no opportunity provided for the public, most specifically the residents that live in proximity to the proposed photovoltaic electric generating facility, to review any of the specifications of the alternative equipment. The panels in particular, not only give off heat, but do consist of toxic/hazardous materials. Given both the Federal and State of Connecticut concerns with climate change, it would certainly seem that the public should have an opportunity to review the specifications of the exact equipment that will be installed, if there is deviation from the currently documented equipment list.

From a wildlife perspective, I strongly believe that allowing sheep to graze on the property puts their safety and welfare at great risk. It is a well-known fact that there are coyotes, bears and bobcats that habituate the area of the proposed solar photovoltaic electric generating facility and while the Petitioner expects that some type of protective animal species, such as a llama and/or donkey will deter/protect the sheep from predatory harm, I do not agree with their assessment and rather than be proven right with the sight of sheep carcasses, I respectfully request that the Council mandate a modification to the Petition that prevents sheep from grazing on the land. The Petitioner expressly indicated that there was no financial difference between utilizing sheep versus utilizing mechanical means of keeping the vegetation under the panels in check.

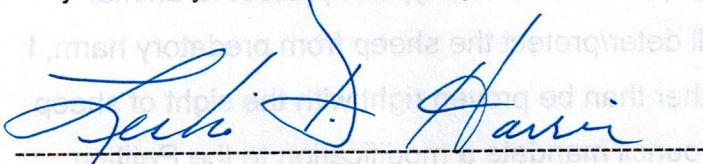
Pedestrian and automobile safety is a concern, especially during the construction phase of the project. River Street is only a two-lane road, one lane in each direction. River Street is especially narrow from the end that is accessible from Route 75. Additionally, for large trucks transporting panels and construction equipment making the turn at the corner of River Street and Old River Street is very tight. I have concerns that the increase in the volume of traffic, as well as the size of vehicles using the roadway that will result from this project, will put not only the safety of the many residents and their pets in jeopardy, it may well pose a hazard to other automobiles and their passengers as well.

Conclusion:

I believe the concerns I have outlined above, demonstrate why the 445 River Street location for this solar photovoltaic electric generating facility is an inappropriate one and not in keeping with the documented responsibilities the CT Siting Council has for "...balancing the need for adequate ... public utility services... with the need to protect the environment and ecology of the state and to minimize damage to scenic, historic, and recreational values" as well as "providing environmental standards for the location, design, construction, and operation of public utility facilities...that are sufficient to assure the welfare and protection of the people of Connecticut".

There are certainly other physical locations for a project such as this, that eliminate the stated concerns and alleviate the possible harm that will befall the students being educated and the residents and wildlife that live in the environs surrounding 445 River Street.

As you take your final vote today, I respectfully request that the Council deny this Petition.



Leslie D. Harrison (Intervenor)