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April 25, 2024

SENT BY EMAIL

Melanie Bachman
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Petition No. 1609 – TRITEC Americas, LLC notice of election to waive exclusion from Connecticut for a declaratory ruling, pursuant to Connecticut General Statutes § 4-176 and § 16-50k, for the proposed construction, maintenance and operation of a 0.999-megawatt AC solar photovoltaic electric generating facility located at 250 Carter Street, Manchester, Connecticut, and associated electrical interconnection.

MARSD Pre-Filed Testimony

Dear CT Siting Council:

As a spokesperson for MARSD, I am writing to oppose Petition No.1609, the Solar Project proposed for 250 Carter St., Manchester, CT. As Manchester residents, we are concerned with the location and the environmental effects it will have on the surrounding neighborhoods and our community.

This proposed Solar Project location is currently zoned Rural Residential. It will be located within a forest between two residential neighborhoods. The Shenipsit Trail passes through this forest and is enjoyed by nature lovers year-round. The neighbors feel as I do that a Solar Project is better suited in a commercial or industrial zone and not near a residential neighborhood.

We have a number of concerns surrounding this Solar Project.

Destruction of [Urban Core Forest](#),¹ which is home to [CT Species of Special Concern](#)² the Eastern Box Turtle and other woodland creatures. The turtle does exist in this forest. (See

¹ Connecticut's 2020 Forest Action Plan – Dan Perrachio

² DEEP Report on 250 Carter St, Manchester, CT

Exhibits A - photos of turtles) In an article by the Turtle Survival Alliance titled [Eastern Box Turtle](#)³, it states that one of the largest threats to this turtle is loss of habitat. With the construction and ongoing maintenance, the care that is needed to oversee a Species of Special Concern may not be given proper attention.

This parcel also serves as a migratory corridor for larger wildlife like deer, fox, turkeys and coyotes. A news article in National Geographic stated that [Habitat destruction](#)⁴ is a threat to all of the animals in the forest.

We believe the clear-cutting of 8 acres of forest will lead to other potential problems. Keeping a forest intact provides so many more benefits than cutting it down. According to the WWF (World Wildlife Fund): Forests help prevent erosion and enrich and conserve soil and habitat loss is one of the main causes of biodiversity loss, as land that once was forest is cleared for other uses.

With the deforestation, we are concerned with soil erosion and the possible exposure of the Algonquin gas pipeline which lies within this forest. An added concern is [Project Maple](#)⁵ – which is the future expansion project of the Algonquin pipeline which is managed by Enbridge.

This Solar Project will encroach on and divert existing wetlands. [Manchester Next pages 176 -178](#) (Conservation & Growth Area Definitions and Maps)⁶ Protection of our wetlands are needed to preserve the forest, plant life and our wildlife.

The existing neighborhoods on both Amanda Drive and Blue Ridge see significant stormwater and ground water drainage year-round after rainfall and snow fall as evidenced in the attached photos taken on April 8th, 2024 on Blue Ridge Drive (uphill from the proposed Project site) and videos of the storm and ground water after the rainstorm along Amanda Dr. (Exhibit B photos of Blue Ridge and Amanda Dr.). The previous rainstorm came through 4 days earlier on April 4th, with Bradley recording 1.5" of liquid precipitation. [Plainville, RI residents](#)⁷ know first-hand how a Solar Field drainage system can fail and flood their homes when they never had that issue before.

Last year, there were three solar fires in upstate [New York](#).⁸ The state officials declared a shelter in place order for residents within a 1-mile radius in the aftermath of 1 of 3 solar

³ Eastern Box Turtle by Turtle Survival Alliance

⁴ The Global Impacts of Habitat Destruction by National Geographic Newsroom - [The Global Impacts of Habitat Destruction \(nationalgeographic.org\)](#)

⁵ Conservation Law Foundation – This is what the Here’s What the Project Maple Gas Pipeline Means for New England

⁶ Manchester Next Town Newsletter p. 176- 178

⁷ CBS News Story “Unconscionable,” Plainville residents say solar farm is causing Flooding that’s ruining their homes.

⁸ WWNYTV news – Residents told to shelter in place due to potentially toxic smoke from solar farm fire

farm fires due to air toxicity and pollution concerns. New protocols, plans and/or training will be needed for our first responders in the event of a facility disaster. Because this solar facility is located in a forest, extra steps may be needed in case of a wildfire due to the location.

If there is a fire, there are concerns with toxic waste or chemicals that will leak into the soil. Blue Ridge Drive has septic and well water and there are concerns from the residents that their wells will become contaminated with chemicals.

There is a concern with the vegetation management around the solar facility. Will the herbicide or pesticides that are administered leak into the soil and taint the wells? We did not see the toxicology report on the herbicide or pesticide the contractor plans to use.

Carter St. is a hilly and well-traveled road with blind spots. With the large equipment and vehicles used during construction, will there be enough room for them to maneuver in the area or will they have to back out onto the street into oncoming traffic? This may cause a traffic hazard. The same goes for emergency vehicles.

A major concern is noise pollution from the inverters. [East Windsor](#)⁹ residents and their state representatives have complained of an ongoing high pitch ringing sound coming from the solar facility inverter. Complaints have gone unanswered by the developer. (Exhibit C Noise video) The noise is unsettling and could cause harm not only to residents but wildlife and pets. In reviewing the products that will be used for the project, Tritec identified the SunGrow SG125HV/ SG125HV-20 Grid Inverter. [Page 29 of the SunGrow user manual](#)¹⁰ for this inverter says to **install the inverter where children cannot reach it and do not install the inverter near residential areas. Noise can be produced during inverter operation which may affect the daily life. There are other warnings within the user manual for installation that says to add signage due to possible electrical shock.**

At the end of the day, my neighbors and I are concerned with the environmental effects and the effects to our neighborhoods. As mentioned in this testimony, we have valid concerns with the noise pollution, stormwater, the wildlife, the aesthetic, fire hazards from the inverters and possible wildfires to name a few. We wouldn't be concerned if it wasn't happening in other states and other communities. We realize solar energy is the future but this is not appropriate location for a Solar facility.

Thank you,

Rose Carroll
Vice President and Secretary of MARSD

⁹ [Noise complaints risk souring CT community on solar energy \(ctmirror.org\)](#)

¹⁰ SunGrow User Manual for SG125HV/SG125HV-20

Footnotes in Testimony

Links to articles

- 1 [Connecticut's 2020 Forest Action Plan \(arcgis.com\)](#)
- 2 [appendix-c---deep-correspondence.pdf \(ct.gov\)](#)
- 3 [Eastern Box Turtle - Turtle Survival Alliance](#)
- 4 [The Global Impacts of Habitat Destruction \(nationalgeographic.org\)](#)
- 5 [Project Maple Gas Pipeline Explained \(clf.org\)](#)
- 6 [adopted-version-manchester-next-pocd-july-12-2023-with-hyperlinks.pdf \(manchesterct.gov\)](#)
- 7 ["Unconscionable," Plainville residents say solar farm is causing flooding that's ruining their homes - CBS Boston \(cbsnews.com\)](#)
- 8 [Residents told to shelter in place due to potentially toxic smoke from solar farm fire \(wvnytv.com\)](#)
- 9 [Noise complaints risk souring CT community on solar energy \(ctmirror.org\)](#)
- 10 [\(sungrowpower.com\)](#)

**Exhibit A – Turtle Pictures found in the Forest behind
Amanda Dr.**





**Exhibit B – Water Issues on Blue Ridge Dr
and Amanda Dr (See video)**





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MARSD Representation at the May 2nd hearing

Dear CT Siting Council:

Good morning!

I will be representing MARSD at the May 2nd Hearing. We do not have legal representation and will not be presenting any witnesses.

Thank you,
Rosemary Carroll
Vice President and Secretary of MARSD