



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

March 7, 2024

Rachel Schnabel
263 Blue Ridge Drive
Manchester, CT 06040
rmdschnabel@gmail.com

RE: **PETITION NO. 1583** – TRITEC Americas, LLC notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes §16-50k(e), and petition 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 Parcel Nos. 113-1 and 113-1-A, 428 Bethmour Road, Bethany, Connecticut, and associated electrical interconnection.

Dear Rachel Schnabel:

The Connecticut Siting Council (Council) is in receipt of your Request for a Public Hearing, dated March 7, 2024, for the above-referenced petition.

Your request will be placed on the March 14, 2024 meeting agenda, a copy of which is attached. You will be notified of the Council's determination immediately thereafter.

Please contact our office at 860-827-2935 if you have any questions.

Sincerely,

Melanie Bachman
Executive Director

MB/RDM/dll

c: Service List dated January 26, 2024
Council Members

263 Blue Ridge Drive
Manchester, CT 06040

March 7, 2024

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

RE: **PETITION NO. 1609** – TRITEC Americas, LLC notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes §16-50k(e), and petition 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.

Dear Executive Director Bachman and Members of the Siting Council:

We are writing to formally request a public hearing be held with respect to the above-referenced petition (“the Petition”). We have grown up understanding the significance of global climate change, and we commend the State for working towards a carbon-free energy goal. However, we do not believe that the benefits of the proposed solar photovoltaic electric generating facility at 250 Carter Street in Manchester, Connecticut (“proposed Project”) outweigh the negative impacts to the environment, ecology, and assets of scenic, historic, and recreational importance. This steeply sloped, heavily wooded parcel contains wetlands, the Algonquin natural gas pipeline, and a segment of the “blue blazed” Shenipsit Trail. The proposed Project involves substantial clearing of core forest with direct impact to wetlands. Additionally, the proposed solar array is in extremely close proximity to adjacent residential homes.

The proposed Project would result in the clearing of at least 7.8 acres, which accounts for 30% of approximately 23 acres of core forest on the parcel. Connecticut DEEP states that solar development projects “should not be sited in a core forest” and to “avoid siting solar facilities in forested areas” (Solar Permitting Factsheet 9/17/2020). This proposed loss of core forest poses a significant threat to the local ecosystem and biodiversity, including multiple species of concern identified by State and Federal agencies. Forests provide habitat, carbon sequestration, stormwater uptake, and soil stabilization.

The proposed disturbance to the site would result in an increase in stormwater runoff produced by rain events. Additionally, the presence of wetlands indicates a shallow groundwater table. With limited storage available in the ground, it is likely that the site cannot support an increase in stormwater runoff, which would exacerbate existing drainage issues at the downhill properties along Amanda Drive. The Petitioner did not account for the groundwater table in their submitted design. A groundwater hydrologic analysis should be provided to the Siting Council.

We have concerns about the scope of improvements that Eversource may need to implement in order to accommodate the interconnection of the proposed solar photovoltaic electric generating facility to the grid. No information regarding Eversource’s evaluation of requirements appears to be publically available at this time so we do not yet know the level of disturbance to our community from these required improvements.

While the risk of fires at photovoltaic energy generating facilities is low, this site presents a number of particularly hazardous aspects compared to many other sited facilities in Connecticut. From a fire control perspective, in the event of an electrical fire, significant volume and flow of water would be required to prevent the spread of a resulting brushfire since the source cannot be extinguished. The nearest fire hydrant is approximately 2,000 feet from the proposed access road, and significantly down gradient, which would likely require relay pumping operations using multiple fire engines just to get water up to the site. The close proximity of the proposed system to a number of residences to the East increases the risk of fire extension to homes therefore threatening life and personal property. The nearby natural gas distribution pipeline to the West on the parcel would be another high risk in event of uncontrolled brushfire.

It does not appear that the Petitioner has taken into account the visibility of the Site from many of the residential properties on the opposite side of Blue Ridge Drive and on Bette Drive. Because these properties are uphill from the Site, there will likely be direct visibility of portions of the solar array from some of these residences; at the very least, the massive clearing in the forest will be abundantly visible. Our house, which was recognized with a Preservation Award by the Cheney Brothers National Historic Landmark District Commission last year, is one of these uphill properties; the view from our second-floor balcony will certainly be diminished.

While the Petitioner assures us that a vegetative buffer would shield any negative visual aspects of the solar photovoltaic electric generating facility, it will take years for this buffer to mature and fill out. Additionally, one of the plants proposed for this vegetated buffer is American Holly, which is not native to Connecticut and, therefore, will not have as strong of a benefit to the local ecosystem.

We find many of the claims in the Petition to be insultingly false. The Petitioner claims the “proposed Project would greatly benefit the abutters”, when zero direct benefits have been demonstrated. The Petitioner claims the completed facility would benefit the Town of Manchester as an “educational tool for local schools”, but there are already solar panels at six of our schools, including a solar tracking flower at Buckley Elementary. The Town of Manchester is a leader in sustainability, as expressed by the comments submitted by our Town Manager.

To reiterate, we formally request a public hearing be held concerning the Petition because we believe that the negative impacts to the environment, ecology, and assets of scenic, historic, and recreational importance outweigh any benefits of the proposed solar photovoltaic electric generating facility. There are a multitude of more suitable locations for such a facility.

Thank you for taking the time to review this matter.


Rachel Schnabel, PE


Dana Schnabel



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VIA ELECTRONIC MAIL

DATE: March 7, 2024
TO: Council Members
FROM: Melanie Bachman, Executive Director *NAB*
RE: Connecticut Siting Council Energy/Telecommunications Meeting

An Energy/Telecommunications meeting of the Connecticut Siting Council **via Zoom Remote Conferencing** will be held on Thursday, March 14, 2024, at 1:00 p.m. Please note that the draft documents related to the agenda items will be available to view on-line on our website at portal.ct.gov/csc under the Tab - Meetings and Minutes - on the left-hand side of the home page.

Join Zoom Meeting

<https://us06web.zoom.us/j/87463731256?pwd=Zfox8c9NRIVYRUVHmA9Bch7Bn7reAu.1>

Meeting ID: 874 6373 1256

Passcode: 4qXrit

Dial +1 929 205 6099 US (New York)

Meeting ID: 874 6373 1256

Passcode: 330625

AGENDA

1. Minutes of February 29, 2024.
2. **DOCKET NO. 517** – MCM Holdings, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at the Boy Scouts of America Camp Hoyt, 288 Simpaug Turnpike (Parcel No. 12-29), Redding, Connecticut. Draft Findings of Fact.
3. **PETITION NO. 1592** - Santa Fuel, Inc. petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 3.85-megawatt AC solar photovoltaic electric generating facility located at 159 South Road, Somers, Connecticut, and associated electrical interconnection. Draft Findings of Fact, Opinion, and Decision and Order.
4. **PETITION NO. 1609** – TRITEC Americas, LLC notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes §16-50k(e), and petition 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. CGS §4-176 Deadline for Action - Requests for Public Hearing.

5. **TS-DISH-086-240214** - Dish Wireless, LLC request for an order to approve tower sharing at an existing telecommunications facility located at 71 Moxley Road, Montville (Uncasville), Connecticut. Decision.
6. **TS-VER-130-240214** – Cellco Partnership d/b/a Verizon Wireless request for an order to approve tower sharing at an existing telecommunications facility located at 459 Burr Road, Southbury, Connecticut. Decision.
7. **Administrative Matters**

- ***Regular Items***

- Upcoming Calendar Events:

- Petition No. 1598, Tuesday, March 19, 2024, **continued evidentiary hearing session** beginning at 2:00 p.m. via Zoom remote conferencing.
- Docket No. 520, Thursday, March 21, 2024, **evidentiary hearing session** beginning at 2:00 p.m. and **public comment session** beginning at 6:30 p.m. via Zoom remote conferencing.
- Energy/Telecommunications Meeting, Thursday, March 28, 2024, beginning at **1:00 p.m.** via Zoom remote conferencing.

cc: Secretary of the State