

STATE OF CONNECTICUT *connecticut siting council* Ten Franklin Square, New Britain, CT 06051 Phone: (860) 827-2935 Fax: (860) 827-2950 E-Mail: <u>siting.council@ct.gov</u> Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

March 5, 2024

Megan Pilla, PLA Principal Development Planner Manchester Planning & Zoning Commission 41 Center Street P.O. Box 191 Manchester, CT 06045 mpilla@manchesterct.gov

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 Megan Pilla:

The Connecticut Siting Council (Council) is in receipt of your correspondence and Request for a Public Hearing, dated March 5, 2024, concerning the above-referenced petition. Thank you for taking the time to provide the Council with your comments.

The Request for a Public Hearing will be placed on the next Council meeting agenda, a copy of which will be sent to you. You will be notified of the Council's determination immediately thereafter.

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

Copies of your correspondence will be distributed to the service list for the proceeding and will be administratively noticed in the record. Please note that you can view all of the documents related to this proceeding on our website at <u>http://www.ct.gov/csc</u> under the "Pending Matters" link. You may also keep apprised of Council events on the website calendar and agenda.

Thank you for your interest and concern in this very important matter.

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

Sincerely,

Muliiphael

Melanie Bachman Executive Director

MB/RDM/dll

c: Service List dated January 26, 2024 Council Members



Town of Manchester

41 Center Street • P.O. Box 191 Manchester, Connecticut 06045-0191 www.manchesterct.gov JAY MORAN, MAYOR SARAH JONES, DEPUTY MAYOR PAMELA FLOYD-CRANFORD, SECRETARY

> DIRECTORS ED BOLAND PETER CONYERS JERALD LENTINI JESSEE MUÑIZ POLAND ZACHARY REICHELT DENNIS SCHAIN

STEVE STEPHANOU, TOWN MANAGER

March 5, 2024

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

To Ms. Bachman and the CT Siting Council:

I am writing regarding **Petition No. 1609**, the proposal from TRITEC Americas, LLC for a 0.999-megawatt AC solar photovoltaic electric generating facility at 250 Carter Street, Manchester, CT.

On Wednesday, February 21, 2024, the Manchester Planning & Zoning Commission (PZC) held a public hearing for the purpose of collecting comments from the citizens of Manchester on this petition. We have compiled all of the comments that we received and hereby submit them to the Siting Council for your consideration.

Town staff also have several concerns about the proposal, which are also hereby submitted for your consideration.

Based on the quantity of comments received and the level of concern expressed, *the Manchester PZC respectfully requests that the Siting Council hold its own public hearing on Petition No.* 1609 *before making a final decision.*

Thank you for your consideration, and for all of the work that you do for communities in the State of Connecticut.

Respectfully,

Mapon H. Pilla

Megan Pilla, PLA Principal Development Planner Town of Manchester, CT

Attached: Compiled Town staff comments Compiled public comments

CC: Gary Anderson, Director of Planning & Economic Development Eric Prause, Planning & Zoning Commission Chair Steve Stephanou, Town Manager

Town of Manchester staff have the following concerns about the proposed solar facility at 250 Carter Street:

From Megan Pilla, PLA (Principal Development Planner):

1. The extent of proposed forest clearing

This proposal includes the clearing of approximately 7.8 acres of forest. This represents 30% of the identified 23-acre Small Core Forest on the site, and a significant loss of urban forest for a town like Manchester, which is heavily developed. CT DEEP has stated that solar facilities should not be sited in core forests, and further recommends that a 300-foot wetland buffer be utilized "to protect core forest connectivity and function," which is not included in this proposal (*CT DEEP Solar Permitting Fact Sheet, 2020*).

In addition to being a core forest, it is noted that although it has been identified as a Red Oak-Sugar Maple transition forest, this area is likely well on its way to becoming an old growth forest. The environmental assessment provided by the petitioner notes that "the canopy understory is mature," and that "some very large specimen trees are located throughout the forest." The described species composition is also indicative of late stage succession, as it includes several oak, beech, and hickory species, among others. This forest is approaching the level of a climax community, and as such its ecological value cannot be understated. The 7.8 acres of forest proposed to be cleared are actively sequestering massive amounts of carbon, absorbing a significant amount of water from the ground, and stabilizing the soil.

The submitted decommissioning plan for the proposed facility indicates that upon decommissioning, the site will be returned to its current condition. It must be understood that this is impossible – it would take many decades for a forest of this type to re-establish and reach its current successional stage.

In summary, it would be ecologically irresponsible to clear cut this area to accommodate a solar array with a 20-year lifespan.

2. The proposed new vegetation

The applicant describes the proposed facility as an "agrivoltaic" project, which is defined as "agricultural production, such as crop or livestock production or pollinator habitats, underneath solar panels or adjacent to solar panels." They indicate that the existing maple taps on the property will be relocated and continue to be used; however, there is no explanation of who will be using them. As a California-based company, it is difficult to believe that TRITEC, as the property owner, will be actively using the maple taps.

We also disagree with the assumption that a viable pollinator habitat will exist underneath the solar panels. The proposed seed mix (ERNMX-147) is specifically designed for solar arrays, but it is not a native mix, nor does it include an exceptional variety of pollinator-friendly species. It consists of

several fescues, two varieties of Kentucky bluegrass, and Dutch white clover. While the clover may provide some benefit to certain species, the rest of the mix is essentially lawn.

Additionally, the site maintenance plan indicates that the site will be mowed as needed to prevent vegetation from blocking the sun, and that herbicides will be used as needed. Mowing and the use of herbicides are detrimental to pollinators. This will not be a pollinator-friendly habitat.

3. Wetland impacts of the proposed facility

Approximately 1,100 square feet of direct, permanent wetland impacts are proposed in this project. A segment of a semi-permanent watercourse will be piped to allow the 12-foot gravel access road to cross the existing wetland. Indirect wetland impacts are not discussed in the reports, but are clearly present. The overflow outlet from proposed stormwater basin drains directly toward a wetland, and the amount of water that may be expelled from the outlet during storm events could be quite high (keeping in mind that the trees will no longer be there to take up the water they currently take from the ground). To outlet high volumes of stormwater directly into a wetland will inevitably have an impact that has not been discussed.

4. Wildlife impacts of the proposed facility

The 7.8-acre facility is proposed to be surrounded by a 7-foot chain link fence. This will create a significant obstacle for wildlife, which likely includes some larger mammalian species based on the size of the existing forest. As a small core forest, this area likely functions as a corridor for a variety of wildlife, and this disruption to their migratory patterns may have detrimental impacts. Inevitably, the clearing will also eliminate a significant portion of the existing wildlife habitat.

This site is located within a CT DEEP Natural Diversity Database (NDDB) area for the Box Turtle, which is listed as a species of State Special Concern. As indicated by the submitted NDDB review, these turtles live and hibernate in well-drained forest bottomlands, and habitat loss, fragmentation, and degradation are the greatest threats to the species. It is clear that the proposed project would eliminate, or at least degrade, 7.8 acres of viable habitat for this species. And, because the proposed facility is located at the top of the hill, the turtles may not be able to move to other parts of the surrounding forest due to the presence of wetlands. They require the well-drained portion of the forest in order to hibernate a few inches below the surface of the ground.

5. Proximity of the proposed facility to residential neighbors

The proposed solar array is located approximately 78 feet from the nearest property line, and 219 feet from the nearest house. This is not a significant distance, and although a buffer of existing vegetation is proposed to remain, the vegetation is primarily deciduous and will not provide an adequate visual buffer for half of the year. The single row of proposed evergreen trees will not screen much either, keeping in mind that the adjacent houses sit about 30 feet higher than the proposed array and look down onto the site. With a maximum panel height of 6 feet at full tilt, those evergreen trees will not provide any visual screening for the neighboring houses until they reach 40 feet in height.

In addition to visual screening, sound is a concern. We have heard about similar facilities in other CT municipalities which have become a nuisance for residential neighbors due to the constant humming sound produced by the facility. The submitted documents indicate that the anticipated level of sound, when it reaches the neighboring properties, will be about 29 decibels, which is similar to the sound of a person whispering. While this may seem quiet, it must be considered that a constant hum, even at that level, can become a nuisance and significantly impact quality of life, particularly for people with auditory sensitivities.

From David Laiuppa (Environmental Planner/Inland Wetlands Agent):

It is understood that the applicant is seeking approval for exclusion of the proposed solar facility from the Connecticut Siting Council's jurisdiction. In addition to comments that have been submitted by the public there are several "red flag" issues that should warrant further review, public transparency, and regulatory oversight.

These issues are larger than site specific details, as outlined in the proposal, because they have potential larger repercussions, beyond the confined limitations of the project.

1. Habitat impacts

The proposed facility is located in an area that has been identified as a core forest. It has been recommended by the Connecticut Department of Energy and Environmental Protection (DEEP) that the construction of new solar facilities should not be located within areas identified as core forests. There are several reasons for this, as outlined by DEEP, but there should be an open and public discussion addressing why the construction of this facility should not follow DEEP recommendations.

2. Listed species impacts

The proposed facility is located in an area that has been identified as in the Natural Diversity Database as having listed species living within it. While the DEEP has provided suggestions for operational management during and after construction this project will lead to an irreparable fragmentation of the required habitat for the Box Turtle (*terrapene Carolina Carolina*). Fragmentation of primary habitat is considered to be a generational issue that has the real potential to contribute to the decline of a species of concern. The advisement by DEEP only addresses the short-term impacts that may occur during construction and during the operation of the facility, which will negate the project area from habitation of this animal, but it does not address the long-term impacts to the required elements that are being provided in the existing habitat.

The United States Fish and Wildlife Service has identified the project site as a potential roosting site for the Northern Long-Eared Bat (*Myotis septentrionalis*). While it has been correctly acknowledged that there are no known hibernacula on site that would provide suitable winter habitation, the observed and documented large trees on site are likely candidates for spring, summer, and fall roosting sites for many bat species, including the Northern Long-Eared Bat. It is

recommended that, in the absence of existing and current scientific data, there should, at a minimum, be acoustic detection surveys done on site when there are identified suitable habitat elements.

Results of the additional surveys related to listed species is of concern and should be shared in an open and public forum.

3. Regional recreational asset impact

The Shenipsit Trail is part of the blue-blazed trail system that is maintained and supported by the Connecticut Forest and Park Association, with additional support from local and state government. Because this regional asset traverses the property it is in the public interest for all findings from viewshed analyses to be shared. Regional trail assets are beneficial to the public that they serve and go beyond neighborhood and municipal boundaries. A demonstration, by fact, that the proposed project will not have an adverse impact on the intended purpose of this trail should be discussed and demonstrated in an open and public forum.

Regarding project specific elements, there are several items that have been presented that should require further scrutiny. These elements are not of regional concern but still may have local impacts to the environment and surrounding neighborhoods. All of the following concerns would be beneficial to interested parties to be discussed in an open and public forum and should be considered under regulatory oversight.

- 1. Site preparation and construction
 - a. As noted by DEEP, special concern must be taken to insure that listed species are not negatively impacted by project activities. Notes that indicate all recommendations from DEEP should be added to all relevant plans. Additionally, there needs to be some mechanism in place that will serve as a reminder to all field personnel as to what is required and expected on a day-to-day basis (not everyone will have plan sheets at the ready if they encounter a listed species).
- 2. Topography, high groundwater, and the site-wide presence of till all have the potential to result in rapid and significant impacts to downslope properties in the event of a significant weather event and/or failure of erosion and sedimentation controls.
 - a. While it is stated and expected that current regulatory guidelines for erosion and sedimentation controls will be followed, it is recommended that an emergency action plan be in place to protect and, if necessary, mitigate down-slope properties from project related run-off.
 - i. The implementation and public sharing of such a plan will go a long way to appease concerned neighbors.
- 3. Unaccounted impacts to existing conditions
 - a. Stormwater vs groundwater
 - i. The stormwater report, as required, addresses the expected impacts and management of stormwater runoff from the site but, there is no discussion about the groundwater impacts from the project.

- 1. The presence of wetlands on site as well as the site-wide underlayment of till indicate that there is high groundwater on site.
- 2. The planned removal of mature forest trees will result in a significant loss of vegetative uptake of groundwater. This groundwater volume should be accounted for in site run-off because it will be significant and may not have been considered in the calculations that were used to design the proposed systems.
- b. In the siting of the discharge point for site run-off it was designed to discharge just upslope of an existing wetland, which extends beyond the property line.
 - i. Excess loading of volume into an existing system has the potential to cause downslope flooding or, in the long term, an expansion of the footprint of the wetland. Because this wetland system extends onto neighboring properties this practice has the potential to cause affected property owners to have to deal with an unfair burden (including, but not limited to property flooding and damage as well as an increased footprint of a regulated resource on their property).
- c. Creation of edge has greater consequences that just making an area with no trees.
 - i. Elimination of the central portion of a mature forest will result in a new edge habitat around the perimeter of the entire site.
 - Edge habitats are not linear, extending beyond the two-dimensional plane of clearing, edge habitats are a transitional buffer that includes those areas leading up to and beyond the forested limits. Edge habitats and also include those areas where the light penetration varies from that of the core forest.
 - 2. The details and extent of the edge habitat are important because they impact all forms of life that occurs within the previously unbroken mature forest.
 - a. Wildlife habitat elements will be altered.
 - b. Tree growth habits will be changed.
 - c. Plant species will be changed including an expected increase in the presence of invasive species.
- 4. Some of the proposed elements on the site during the expected operational period do are not consistent with the intent of requirements and guidelines.
 - a. Under the "CT DEEP Appendix I Design Regulations/Compliance" section of the Stormwater report it is stated that "There is a minimum of 10 feet between the construction activity associated with the installation of the access road and interconnection and downgradient wetlands."
 - This cannot be true if the access road is designed to directly cross a wetland. The installation of a culvert and the road base are activities associated with the installation of the access road.
 - b. Herbaceous plantings do not replace the functionality of a mature forest.
 - i. The statement that a pollinator mix will be used is well intended but:

- 1. Is not a widely beneficial mix because a low percentage of the plants are actually used by pollinators.
- 2. Has a very low likelihood of effectively benefiting pollinators because it will be an island of herbaceous plants surrounded by mature forest.
- c. Installation of a perimeter fence may be beneficial for security but will be detrimental to wildlife migration and habitation.
 - In addition to the barrier that the fence will impose on the larger wildlife on site, unless the fence is adequately elevated off the ground, the migration and habitation of smaller wildlife (including, but not limited to, wood turtles) will be directly impacted by the fence.
 - ii. The inclusion of a physical barrier will eliminate the effective functionality of the entire project site as a wildlife habitat. Additionally, those species which rely on unfragmented habitats of a certain size will suffer a greater impact because their required contiguous habitat will no longer exist beyond the footprint of the project limits.
- 5. Decommissioning and site restoration consequences.
 - a. It is the plan, as required, to restore the site to "pre-existing conditions".
 - i. In order for this to be done there should be a thorough and property-wide inventory prior to any disturbance.
 - 1. The restoration of a site should include:
 - a. Vegetation
 - b. Wetland extents
 - c. Topography
 - d. Rock outcrops
 - e. Soil aeration
 - f. Groundwater flow patterns
 - g. Reintroduction of duff, hard snags, soft snags, and other cover elements that are utilized by wildlife
 - h. Restoration of impacted soil layers, including the organic layer
 - ii. The restoration of a mature forest will take decades to achieve.
 - A complete inventory, including species identification and core sampling to determine the age of trees should be prior to any site disturbance. Without this data pre-existing conditions will not be known.
 - 2. If mature trees are to be re-introduced for restoration there should be guidelines on the size and caliper of the trees and a timeline for the end goal of restoration.
 - 3. Restoration cannot happen in one season. There has to be a long-term monitoring condition and an achievement status goal.

From John DiBiasi, PE (Assistant Town Engineer):

- 1. It is recommended that a detail be provided for the gravel access road.
- 2. The use of a gravel access road is encouraged through the Town's Low Impact Development Guidelines. However, in accordance with the Town's Zoning Regulations Section 9.02.01 part (d), a permanent impervious driveway apron shall be installed in accordance with the Town's Public Improvement Standards between the roadway and the streetline, extending onto the parcel as necessary to achieve a minimum length of 20 feet of impervious material from the roadway. This is to minimize tracking of gravel into the Town street.
- 3. Existing conditions sheet (and relevant Civil Sheets):
 - a. Abutting parcel addresses should be included with owners.
 - b. Plan should show the 50' drainage and sanitary sewer easement on abutting parcel #161 Amanda Dr.
 - c. Plan should show 20' access easement on abutting parcel #177 Amanda Dr (this is the Shenipsit Trail).
 - d. Plan should identify location of Shenipsit Trail between #177 Amanda Dr and the Gas Easement. An access easement for the Trail should be considered if one has not previously been provided.
- 4. Species of State Special Concern:
 - a. The Decommissioning Plan Part e states that excavated areas will be backfilled and seeded. At the 20 to 30 year period, there is a possibility that the proposed basin could become a wetland and/or a site that would be attractive to the Box Turtle (per information provided from the CTDEEP review). The document should be revised to address this.
 - b. The O&M Plan Item #9 Vegetation Maintenance notes site mowing and/or herbicide applications four times per year. The CTDEEP correspondence states that mowing is a "major source of human induced adult turtle mortality." The document goes on to state that mowing should be avoided between May 15th to September 15th and provides further guidance. This should be reviewed and the O&M Plan revised with the relevant information stated directly in the plan. It's also suggested that the information also be clearly posted *at* the site for future maintenance contractors as there is no on-site structure to house the maintenance reports and documents.
- 5. The O&M Plan should be revised to make reference to the latest CTDEEP Guidelines.
- 6. The parking/turnaround area should be reviewed to ensure that the O&M contractor(s) can maneuver a pickup truck with trailer to avoid unnecessary parking of equipment on Carter Street or the backing of equipment from the site access road into Carter Street.
- 7. Stormwater Management Report:
 - a. Per the Town's Public Improvement Standards Section 3.06 Storm Drainage Systems please review and address the following:
 - Outlet structures shall be multi-staged and designed to accommodate the 2year, 10-year, 25-year, and 100-year storm event and documented analysis for these design year storm events included. The 10-year design storm can be included to supplement the design storms included in the report report. However, the proposed structure has a single inlet and relies on the overflow inlet on the top _and_ the emergency spillway under the largest storm events. This should be reviewed and revised.

- ii. The bottom of the basin should be graded with a minimum 1% slope toward the lowest stage outlet.
- iii. The primary outlet pipe from the basin outlet structure shall have sufficient capacity to convey discharge from a 100-year storm event. The submitted analysis indicates the basin relies on the emergency spillway to convey a portion of the 100-year storm event and this should be reviewed and revised if necessary.
- iv. The basin should be sized to provide a minimum one foot (1') of freeboard for the 100-year storm event.

Note to Engineer: the basin *is* located adjacent to an existing wetland. Please be aware that for cases where a proposed basin is located upgrade of developed areas and cannot discharge directly to a wetland or watercourse (not an issue as currently proposed), then the Town's Public Improvement Standards require the following: "[...] the basin shall be designed to provide a minimum eighteen inches (18") of freeboard for the 100-year storm event with an emergency spillway set a minimum of 6" above the water surface elevation for the 100-year storm event."

- b. The SWMR basin calculations take credit for infiltration. A percolation test should be conducted in the area of the proposed basin. Depth to groundwater and mottling should be noted if encountered. The location of the test should be identified on the drainage and grading plan.
- c. EDA-1 shows the discharge point of the flow path in the vicinity of the western wetlands (partially defined by WLF145 to WLF152 on the exist. Cond. sheet) and PDA-1A intercepts its flowpath and routes the storm water directly to the basin. However, the proposed basin discharges directly to ground to the north of said wetlands. Why not discharge towards the wetlands?
- 8. The property owner will need to be able to maintain the proposed basin outlet and outlet structure which are somewhat landlocked. Adequate access around the top of basin should be provided.
- 9. The Erosion Control plan notes' references should be updated to the latest State guidelines.

The following comments were provided by citizens in writing and/or in person during a public hearing held by the Manchester Planning & Zoning Commission on Wednesday, February 21, 2024:

James Memery (31 Bette Drive):

[*Opposed*] Mr. Memery stated that he opposes the proposal for the deforestation of approximately 7.8 acres and the installation of 2,600 solar panels. The adverse aesthetic and environmental impact on the neighborhood, as well as the native animal population, is inherent in a development of this size. An industrial type of project should not by allowed in the middle of a residential neighborhood. He questioned why this site was selected instead of an industrial or non-residential location, and whether other options were considered. He questioned whether options were considered to save the nearly 8 acres of forest trees that absorb carbon dioxide and emit oxygen. Tritech is funding 3.2 million dollars for this project and will run the facility for 20 years. He questioned how they will profit from this investment, and whether there are any guarantees that they will maintain their 20-year commitment. Northeast Utilities is their only captive customer – will they pay Tritech the same as other electricity suppliers? He questioned if customers of Northeast Utilities will pay the return on investment. He is confused about the relevant statute and State involvement.

(Mr. Memery also provided comments in writing, attached below.)

Rose Carroll (21 Brookview Circle):

[Opposed] Ms. Carroll stated that he opposes the solar farm and questioned who will oversee the maintenance and complaints, and whether there are any fines associated if the company does not adhere to response times. She expressed concern about the construction and how that will impact residents. She also questioned who would be responsible for any impacts on wells and septic systems on Blue Ridge Drive. She is concerned about impacts to water and the environment, as well as the possibility that the facility could expand in the future. Would that have to be approved? CT statutes require decommissioning after 20 years, and she questions who will oversee that. Will there be a bond or trust put in place prior to installation? She expressed concerns about noise pollution, the potential for a solar farm fire, impacts to the Shenipsit hiking trail, impacts to endangered wildlife, and impacts to property values in the neighborhood. In her research, she learned that East Windsor has an array which creates a high pitched sound from the inverters. After 18 months, the solar company has not resolved the problem. There are also fire hazards and health concerns. Last year in New York state there were 3 solar farm fires which created toxic fumes. There are no usable statistics on solar fires because it is categorized as "other" by insurance companies. There is a turtle listed as a species of concern living in that habitat. She expressed concern about the impact on property values. She noted that she has written to State representatives, because this type of project cannot go into residential neighborhoods. She wants her neighbors to feel comfortable where they live.

Pam Carpenter (101 Amanda Drive):

[*Opposed*] Ms. Carpenter reported that she and her husband are very worried about noise pollution and runoff as was previously mentioned. She stated they do not feel this neighborhood is the best location for this, it should be farther away from homes. A different location should be considered.

Linda Woodall (51 Blue Ridge Drive):

[*Opposed*] Ms. Woodall stated that she was shocked to receive a note about the proposed solar farm from a neighbor, and not from the petitioner. She stated that she is concerned about global warming and climate change, but is also concerned about what this will do to the neighborhood. Solar panels on homes are great to reduce carbon footprints, but she speculated as to whether this will reduce property values in the neighborhood, and whether tearing up the woodland and wetland will help the carbon footprint. She questioned who will be responsible for ensuring that the project goes exactly as planned, and whether Tritech might pack up and leave before 20 years. She suggested that other properties in Town would be better locations, such as abandoned properties away from residences.

Martin Hainsey (74 Volpi Road, Bolton):

[*Opposed*] Mr. Hainsey questioned how this project could happen in a residential zone, and whether there will be any adjustment to property values. He also questioned who the electricity will be sold to. He noted that this site is an extension of Case Mountain and wildlife moves through the area on a natural path they have followed for many years. He noted that this site is sandwiched between two neighborhoods. He pointed out that there are many commercial buildings in Manchester and surrounding towns whose rooftops could be utilized for solar arrays.

Ray Welnicki (121 Amanda Drive):

[Opposed] Mr. Welnicki agreed with previous comments. He also noted that the infiltration basin appears to be above his property, 121 Amanda Drive, and 101 Amanda Drive. It appears the overflow pipe will be a water cannon aimed directly at his house. The submitted reports talk about infiltration, but what is being proposed is that the stormwater runoff from 12.7 acres will divert to the infiltration basin which appears to be less than one acre, and a 2-year storm would generate about a million gallons of water that would divert to that one acre sitting above his house. Water travels through the ground until it reaches an impermeable layer and then it will move down the hill and at the bottom will find its way out of the hill, which is called exfiltration, and was not mentioned in the petitioner's report. Those on the eastern side of Amanda Drive experience exfiltration all year long and it's particularly bad in the spring. Currently, the water comes down through the ground and pops out at the lawn level in 4 locations on his property. He estimates that currently 800 gallons per day are coming down from the hill to his property. He speculated about what will happen when the solar farm is built, and all of that stormwater drains to one infiltration basin. He stated that millions of gallons of water will pop out of the hill at his property and his neighbors'. The company's solution appears to be to concentrate all the water in one location and only a few are affected by the water. Any remaining water after infiltration would become a breeding ground for insects. He suggest the company relocated the infiltration basin to the south side.

Roger Paro (255 Carter Street):

[*Opposed*] Mr. Paro's property is directly across the street from the proposed solar farm. He echoed the previous comments. He stated that he is an advocate of solar power, but in his opinion the need to clear cut more than 7.8 acres is not acceptable.

Robert Thulin (211 Carter Street):

[*Opposed*] Mr. Thulin discussed the stormwater concerns, and pointed out how the catch basins along Carter Street drain under the road and onto the property at 250 Carter Street, contributing to the wetlands. He also commented on the proximity to the wetlands and the underground gas line. He questioned whether there any regulations about running an electrical operation so close to the gas line. He echoed the concern about impact on property values. He noted deer can jump a 7-foot fence.

Colin McNamara (47 Grandview Street):

[*Opposed*] Mr. McNamara questioned where the electricity would go and who would profit from the proposed facility. He noted that although the comments have all been in opposition, he feels it will be put through anyway by the Siting Council, and that Federal and State-level green energy mandates are overshadowing local control.

Eric Fuerst (120 Amanda Drive):

[*Opposed*] Mr. Fuerst reported that is opposed to the project for several reasons, including the environmental impact and the concerns about rain and snow melt runoff that were expressed by other residents. He stated that the clear cutting of such a large area of forest will have an impact on water runoff. He is also concerned about the impact on community aesthetics and property values. This is a commercial solar installation in a rural area, which he is against. He stated that removing forest to install a solar farm is ecologically counterproductive.

Keegan Purcell (180 Blue Ridge Drive):

[*Opposed*] Mr. Purcell stated the he worked in solar with a Tesla contractor, and he discussed the process of determining locations for solar arrays. He stated that there is no feasible way that 7.8 acres of clear cut forest will give that installation the power it needs to become effective. He pointed out that this project is meant to be something good for the environment, but is actually destroying it. He also commented that the main failure of most solar systems, other than hail or direct impact, is pests. Small vermin, rodents, and squirrels will chew through the wires and birds will seek heat on them which becomes a fire hazard. He stated that a major concern for him is whether the value of his property will plummet.

Frank Burnes (140 Amanda Drive):

[*Opposed*] Mr. Burnes commented that this is a travesty. Residents are part of a representative government and are unable, in this context, to have someone answer their questions. He is concerned that the water coming off the subject property will be diverted from where it stands today. The culverts under Amanda Drive take on a lot of water year-round. He commented that he has wetlands on his property, and was told that he cannot touch those wetlands, but this global enterprise can divert water and enter wetlands without needing permits.

Rachel Schnabel (263 Blue Ridge Drive):

[*Opposed*] Ms. Schnabel noted that she is the Recycling and Community Services Coordinator for the Town of Manchester, but is speaking on this petition as a resident. In her career as an environmental engineer and a registered professional engineer in the State of CT, she has more than 10 years of experience in the consulting industry. She left that career because she was working on projects like this

rather than doing things that are good for the environment. She reported that she, like her neighbors, has a balcony on her home that overlooks the subject site from above. She echoed previous comments in opposition, and expressed that it is ironic that they want to generate sustainable energy at the expense of the environment. She noted that the company stated that this is 100% carbon free energy, but nothing is 100% carbon free. Carbon is used to create the solar panels. But trees are a source of carbon and when trees are removed, something has to happen to that carbon. She noted that the petitioner claims the project may lower the cost of electricity for local residents, but in fact Eversource will need to make improvements which will cost the customers. She noted that the company claims the project will improve local air quality, which is ironic because they are cutting down trees which is a great source of clean air. She discussed concerns about solar fires, and noted that this site is next to a natural gas line. The nearest source of water for the Fire Department is on Amanda Drive and given the terrain, she is unsure whether the company put any thought into how they would combat a fire. She commented on the NDDB report mentioning box turtles in the area, and how the company said they wold look out for turtles during construction. She says that type of statement is just humoring people, and if no one is there to check, how can we be sure that the wildlife will be taken care of? She noted that this is a small core forest, not a large core forest which is prioritized in the State of CT, but that forests in general are important because they act as a wildlife corridor. She is skeptical about whether the Siting Council will heed residents' pleas, because she has seen developments go through just because the regulations aren't meant to stop projects, but simply to minimize the environmental impacts to the extent possible.

Liz Krajewski (295 Carter Street):

[*Opposed*] Ms. Krajewski stated that had she known a solar farm would be across the street surrounded by an unsightly chain link fence, she would not have purchased her property. She assumes that sentiment would be echoed by potential buyers in the area. She agrees with all the prior concerns expressed by residents. She added that when her solar panels needed to be serviced, it took 9 months to get someone out.

Katherine Fuerst (120 Amanda Drive):

[*Opposed*] Ms. Fuerst echoed the concern regarding property values, noting that they purchased at the peak of the housing market and that a plummet in property value would destroy their investment. She feels this proposal is an insult to the town. She agreed with all of the prior comments, and stated that she feels abandoned because they have no control over this land. She detailed the difficulty the neighborhood currently has with water flooding the sidewalk after it seeps out of the hillside near Amanda Drive, and is concerned that there would be even more flooding caused by the proposed project.

Glen Woodall (51 Blue Ridge Drive):

[*Opposed*] Mr. Woodall noted that he is a retired licensed civil engineer. He commented that the infiltration basin isn't big enough to take on all of the stormwater from the site, and it will drain into the wetlands, picking up and carrying fine soils. He questioned what the remainder of the land will be used for, and who will be responsible for cleaning it up in 20 years. He expressed concern about the potential for a constant humming sound and how that could be detrimental to child development. He questioned who will benefit from this project, and was there due diligence done in looking at other locations.

Marie Urbanetti (213 Blue Ridge Drive):

[*Opposed*] Ms. Urbanetti echoed the concerns about the environmental impact of the proposal and the potential impact on property values. She also followed up Mr. Woodall's statement about the impact of noise on child development, saying that she believed a constant humming sound would also be detrimental to elderly people.

Henrietta Cobb (187 Amanda Drive):

[*Opposed*] Ms. Cobb expressed her agreement with all of the prior comments, including concerns about the impact to property values, stormwater runoff and exacerbation of flooding issues on Amanda Drive, environmental impact, noise pollution, and the residential character of the neighborhood.

William Graver (30 Blue Ridge Drive):

[*Opposed*] Mr. Graver pointed out that a newspaper article referred to the subject property as vacant land, but stated that upland forest is anything but vacant land. He said this upland forest is bordered by many residential properties. He agreed with all of the previous comments. He believes this to be a foolish endeavor. Noting that Eversource claims to own 4,000 miles of overhead lines, he stated that those areas are already clear cut, and could be utilized for projects like this.

Donna Kaffenberger (64 Erie Street):

[*Opposed*] Ms. Kaffenberger explained that she is the Chair of the Town of Manchester Conservation Commission, but that she is speaking as a resident. She stated that clear cutting the forest will impact stormwater management on the site, and that there are environmental issues with removing trees. Invasive species will move in. She noted that noise reverberates when it goes downhill, and she recommended a noise study specific to the site, as well as a glare study.

Dana Schnabel (263 Blue Ridge Drive):

[*Opposed*] Mr. Schnabel questioned whether Eversource has completed a system impact study to quantify the need for grid improvements. He is concerned about the possible need for substantial grid improvements in the vicinity. He also mentioned that the submitted engineering documents refer to a wildlife-friendly fence with a 6-inch gap, but the site plans show a 2-inch maximum gap and he wonders what will actually be installed, and whether it will exclude or allow passage for small animals. He commented that the statements in Appendix G3 state that neighbors in the vicinity of the subject property will not be able to view the proposed facility due to existing tree coverage and vegetative buffers, but that is untrue because he can see from his property on Blue Ridge Drive at least 40-50 feet into the trees, so he will clearly see the panels. The proposed 7-foot tall trees will not help many of the neighbors, and American Holly is not native to CT. He believes that native plants should be chosen after cutting down 8 acres. He also commented on the maple farming operation that was described by the petitioner, stating that he has not seen that on the site. He expressed concern about the risk of fire, stating that a 2,000-foot hose from the nearest hydrant at the dead end, with 150 feet of elevation change, will lose a lot of water pressure.

In addition to these comments made during the public hearing, the attached written comments were submitted by citizens.

February 21, 2024

Tritek Americas 250 Carter Street proposed solar electric plan

My name is James Memery. My family lives on Bette Drive in Manchester. I am here today to oppose the proposed deforestation of nearly 8 acres of our residential neighborhood and installing 2600 solar panels enclosed by a chain link fence.

This is crazy!!! The adverse aesthetic and environmental impact on our neighborhood and the native animal population that we enjoy here is inherent in a development of this size. I can see no justification why an industrial oriented project like this should be allowed in the middle of a residential neighborhood.

We request Planning and Zoning to provide answers to these questions:

- Why was this site selected instead of an industrial or non- residential parcel? What other options were considered? Are there options that would save 8 acres of forest trees that absorb carbon dioxide and emit oxygen?
- We are told Tritech is funding \$3.2 million for this project and will run it for 20 years. How do they profit on their investment?
- Northeast Utilities is their only (captive) customer. Will they pay Tritek the same as other electricity suppliers or do they get a higher (special) rate? What is Connecticut's state involvement? What will residential customers be charged?

It should also be noted that access to Carter St has raised traffic safety concerns in the past. The winding hilly road is dangerous and cars coming over the top of the hill (often at unsafe speeds) cannot see cars pulling out from abutting streets and driveways, especially from Blue Ridge. Tritek accesses Carter St half way between Blue Ridge and the private common driveway on the other side of Carter, which will add to the danger.

Please do not allow this proposal to go forward.

Katie Williford		
From:	Megan Pilla	
Sent:	Thursday, February 29, 2024 9:18 AM	
То:	Gary Anderson	
Cc:	Katie Williford	
Subject:	RE: Petition Against Construction of Solar Farm at 250 Carter Street, Manchester CT	
Follow Up Flag:	Follow up	
Flag Status:	Flagged	
No I haven't sent it yet, I can	add it.	
Katie, please add to the 250 (Carter written comments folder.	
From: Gary Anderson <gandersor Sent: Thursday, February 29, 202</gandersor 		
To: Megan Pilla <mpilla@manche< th=""><td></td></mpilla@manche<>		
· · /	nstruction of Solar Farm at 250 Carter Street, Manchester CT	
I received this today. Is it too late	e to include this with our other comments?	
If so I'll advise the person to cont		
Gary		
From: Anton Banks <antongbanks< th=""><td>s@gmail.com></td></antongbanks<>	s@gmail.com>	
Sent: Wednesday, February 28, 2		
To: Gary Anderson <ganderson@manchesterct.gov></ganderson@manchesterct.gov>		
	ction of Solar Farm at 250 Carter Street, Manchester CT	

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Dear Mr. Anderson,

I hope this letter finds you well. I am writing to express my opposition to Petition No. 1609. I have deep concerns and objections regarding the proposed construction of a solar farm at 250 Carter Street in Manchester, CT. While I am a strong advocate for renewable energy, I believe the current site selection poses significant environmental and community-related challenges that warrant your attention. I respectfully urge you not to support this measure based on the following concerns:

1. **Impact on Wildlife and Ecosystems:**

The proposed solar farm on Carter Street involves the clearance of wetlands and woodlands, disrupting crucial ecosystems that are home to numerous bats, eagles, owls, and various other wildlife. Box Turtles, which are listed among the Special Concern Reptiles in the CT-DEEP site, have been found on the property. Preserving these habitats is vital for maintaining biodiversity, and the environmental benefits of solar energy should not come at the cost of destroying such ecosystems. Additionally, the property includes a path that connects Case Mountain trail network with those in Bolton. Construction of this solar farm would isolate Case Mountain from destinations to the east.

2. **Reflection, Noise, and Aesthetic Concerns:**

As a resident whose property is situated to the west of the proposed site, I am particularly concerned about potential glare and reflection caused by the solar panels. Additionally, residents near an existing solar farm in East Windsor CT have complained about constant and excessive noise generated by the electrical equipment. The alteration of the landscape, combined with concerns about aesthetics, audio, and environmental disruption will lead to a decrease in property values for residents in the vicinity.

4. **Alternative Site Consideration:**

There are several other locations in Manchester that are already clear and not in use. Many of these would be more appropriate for a solar facility. Repurposing any of these sites for renewable energy would avoid the destruction of natural habitats and minimize the adverse effects on our community.

In conclusion, I believe it is crucial to select locations for solar farms that balance environmental responsibility with community well-being. I kindly request a reconsideration of the decision to build the solar farm on Carter Street and urge you to explore alternative sites that are more suitable for such projects.

Thank you for your attention to this matter, and I look forward to a solution that prioritizes both the environmental and community interests of Manchester, CT.

Sincerely,

Anton Banks 238 Blue Ridge Drive, Manchester CT February 21, 2024

Cheri Eckbreth 642 Birch Mountain Road Manchester, CT 06040

Manchester Planning & Economic Development 494 Main Street P.O. Box 191 Manchester, CT 06045-0191 pzccomments@manchesterct.gov

RE: Please present and record my comments at tonight's hearing for the CT Siting Council Petition-250 Carter Street proposed solar facility at 250 Carter Street, Rural Residential Zone.

Dear Planning and Zoning Commissioners:

As you review the zoning implications of the above-referenced 7.8-acre solar panel photovoltaic project in Manchester, I wish to express some concerns over the potential residential, environmental, and ecological impacts to our Rural Residential Zone.

The area on Carter Street, which has been identified for this project is heavily wooded and in a residential area of town that is home to an abundance of wildlife and farmland that maintains livestock. What ecological impact will this project have on the clearing and grading of this land's soil compaction, runoff, and erosion impacts? What will be the impact to the native vegetation and wildlife in the area, including loss of habitat; or direct contact causing injury or death? And what will be the noise impact and health concerns for the neighbors and community at large? What is the noise, glare, visual and aesthetic impacts to this area's landscape and rural character?

Secondly, I have concerns about this property's location in our town's Wetlands, its proximity to standing water and its potential effect on the Porter Brook's upstream basin. It is vitally important to remember, as you contemplate this project, that the quantity of available water within the middle stream and downstream sub-basins depends on water withdrawal and climatic patterns in relevant upstream sub-basins. While solar energy consumes less water than conventional energy sources, the chemicals employed in its production could be harmful. There is always a chance of a spill of some type, which might cause these chemicals to seep into the ground and contaminate Manchester's water supply. What safeguards are being offered to ensure water security and our environmental systems? What plan is being presented to avoid contamination of our surface or ground water, interference with rainfall and our drainage in this location? Will the Army Corp of Engineers or our Inlands Wetlands Committee be consulted on these potential impacts?

In conclusion, while there are certainly benefits associated with using solar farms as an alternative energy source – particularly in terms of reducing carbon emissions and providing clean electricity – it's critical that Manchester's PZC and the CT Sitting Council carefully consider both the direct and indirect social costs before moving forward with this project in order to ensure sustainable progress going forward for decades into our collective future(s).

Whatever your decision, please accept my sincere thanks for your time and thoughtful consideration of the impact this project could have on our rural residential zone and all the lives that depend on it.

Respectfully, Cheri Eckbreth

From: Sent: To:	frank shurick <fshurick@gmail.com> Friday, February 16, 2024 9:32 AM jmoran@manchester.gog; PZC Comments; melanie.bachman@ct.gov; siting.council@ct.gov; Sarah Jones; jpoland@manchestct.gov; Ed Boland; rzeichelt@manchesterct.gov; Peter Conyers; Dennis Schain; jlentini@manchesterst.gov; Marllyn Barman</fshurick@gmail.com>
Subject:	***SPAM*** 3 SQUARED LLC-SPECIAL EXEMPTION (PSE-0058-2023)
Importance:	Low
Follow Up Flag: Flag Status:	Follow up Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Dear Siting Council and Board Members,

My wife and I are the owners of the property at 150 Carter street. My name is Frank Shurick.

I received the legal notice concerning this proposal to place a solar facility at 250 Carter Street.

Please do not approve placing the facility on this property. You will be destroying 7.8 acres of mature maple trees and the region is adjacent to a protected nature preserve that supports wildlife including deer, rabbits, foxes, owls, squirrels et al.

I also worry about water runoff coming down Case mountain during heavy rains. The forest absorbs much of the water. My home will be flooded.

In addition I am curious as to the safety issues of placing an electrical facility next to a major natural gas pipeline that runs through the middle of the 250 Carter Street property.

The proposal states that this project is environmentally responsible. This project does not meet that standard.

In addition to the above my property value will most likely be diminished and unacceptable noise pollution will be introduced into our community. This is a residential community not an industrial park.

Please do not approve this project.

Thank you, Frank Shurick <u>fshurick@gmail.com</u>

From:	Bonnie Loveland <bonloveland@gmail.com></bonloveland@gmail.com>
Sent:	Monday, February 19, 2024 1:50 PM
То:	PZC Comments
Subject:	***SPAM*** Re: Solar Facility at 250 Carter Street
Importance:	Low

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Hi,

I found the PDF document on the website. It looks like the Shenipsit Trail will be undisturbed. It also looks like a large number of trees will still be left standing. I'm writing in favor of the proposal, I think that clean energy is worth the tradeoffs.

Thank you, Bonnie Loveland 274 Blue Ridge Drive, Manchester

On Mon, Feb 19, 2024 at 1:30 PM Bonnie Loveland <<u>bonloveland@gmail.com</u>> wrote:

Hi,

I just have a question about the solar facility being proposed at 250 Carter Street. Will the Shenipsit Trail still be able to cut through on its current path from Carter Street to Amanda Drive?

Thank you, Bonnie Loveland 274 Blue Ridge Drive, Manchester

Katie Williford	/
From: Sent: To: Subject:	Megan Pilla Thursday, February 29, 2024 9:31 AM Katie Williford FW: ***SPAM*** CT Siting Council Petition 1609 – Opposition
Importance:	Low
Follow Up Flag: Flag Status:	Follow up Flagged
2 more to add to the 250 Ca	arter folder, this and another to follow
From: David Laiuppa <dlaiuppa Sent: Thursday, February 29, 20 To: Megan Pilla <mpilla@manc Subject: FW: ***SPAM*** CT S Importance: Low See below</mpilla@manc </dlaiuppa 	024 9:13 AM
David Laiuppa Environmental Planner / Wetla Planning and Economic Develop 494 Main Street Town of Manchester, CT 06045 (860) 647-3046	oment
From: Eric Fuerst < <u>fuerstem@g</u>	<u>mail.com</u> >

Sent: Wednesday, February 28, 2024 11:45 PM To: David Laiuppa <<u>dlaiuppa@manchesterct.gov</u>> Subject: ***SPAM*** CT Siting Council Petition 1609 – Opposition Importance: Low

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Dear Mr. Laiuppa,

Hello, my name is Eric Fuerst and I live at 120 Amanda Drive, Manchester CT 06040. I am writing: 1) to inform you of <u>PETITION NO. 1609</u> with the CT Siting Council, and 2) ask for your department to comment on this proposal.

Please submit your comments and notes to the CT Siting Council by March 7, 2024 at <u>siting.council@ct.gov</u>; <u>melanie.bachman@ct.gov</u>.

Petition 1609 is a request by TRITEC Americas, LLC to build an industrial solar facility on rural residential zoning at 250 Carter Street, Manchester. They are petitioning the CT Siting Council for a Declaratory Ruling as a 0.999 MW power plant to circumvent local scrutiny as a less than 1 MW facility. This proposal is detrimental and its purported benefits do not outweigh the harm it will impart on the environment and surrounding community. I am concerned about various impacts this proposed construction will have on my neighborhood/community. My areas of concern include but are not limited to: 1) environmental impacts, 2) habitat destruction, 3) and safety issues.

Environmental Impacts: A significant concern that was not adequately addressed in the proposal is water runoff from the parcel – located on a hillside – toward Amanda Drive from rain, snowmelt, and infiltration basin overflow. Currently, on the east side of Amanda Drive the drainage is already extremely challenged. The sidewalk is flooded after moderate rain or snowfall and remains affected much of the winter and spring. Clear cutting at least 7.8 acres of forest may have a large unforeseen impact on water absorption and erosion of the sloped terrain on the parcel. Further, water flow paths may change. Based on the drainage report provided in the petition, it's not clear that the drainage onto Amanda Drive will be unaffected.

In addition to the impacts on the surrounding neighborhoods, the construction directly and indirectly impacts a portion of protected Wetlands and Watercourses. According to the proposal's environmental report, "approximately 1,100 square feet of unavoidable direct impact is proposed to inland wetlands and watercourses".

Habitat Destruction: Many species utilize these forests for sustenance, shelter, and safe passage. Of these species is the Eastern Box Turtle – listed as a "species of special concern" by CT DEEP. These turtles tend to spend their entire lives in an area of less than 2 acres. The proposed site will destroy approximately 8 acres of this animal's habitat – the petitioner's solution being to move them out during construction and simply put them back after. This is hardly a solution as the site will no longer be the appropriate habitat, thus the animals will be forced to find new homes. In addition to the Eastern Box Turtle, there are several species of bat that are considered Species of Greatest Conservation Need (GCN) as well as some that are listed as Endangered by the State and Threatened Federally.

There are six species of bat in Hartford county, three of which are Species of Special Concern that dwell/roost in trees – Silver-haired Bat, Eastern Red Bat, and Hoary Bat. Exhibit G Environmental Assessment also mentioned that the habitat within the parcel is suitable for Northern Long Eared Bats, one of the six bat species and an animal that is listed Endangered by CT and Threatened Federally. Destruction of their habitats is one of the primary drivers to species decline. Not only does this affect the aforementioned Species of Special Concern, but it will displace many other animals including local deer, coyotes, birds, and rodents.

Health and Safety: The project also poses safety and quality of life concerns for the community. While the risk of fire may be low due to a solar farm, in this case, the consequences are high. There is a gas line that passes through the woodlands which runs close to the proposed site. Fire in this area would cause substantial damage to the woodlands and nearby neighborhoods, potentially being exacerbated by proximity to the gas line. The terrain may also prove difficult for first responders who would be battling such a fire.

In addition to fire risk the plan also calls for regular use of herbicides and pesticides. As stated prior, the significant likelihood of excessive drainage could cause unintended spreading of these chemicals. The usage of these chemicals may affect children, pets, and wildlife that live in the area.

Finally, the constant noise pollution from the power inverters would be a nuisance to the neighboring homeowners, pets, and the wildlife that live in the woods. The decibel levels expressed in the proposal will be similar to those that are experienced by East Windsor residents near a solar farm. DEEP allows up to 66 dBA. They have been negatively impacted by amplitudes below CT DEEP guidelines – approximately 30 dBA. While this is the level of a constant whisper, this equates to high pitch buzzing all day long, disturbing our neighborhood's tranquility.

With the points listed above, the detriments clearly outweigh the purported benefits of this proposal. Destroying acres of forest is counterproductive when there are many suitable, more developed locations not situated on residential zoning. CT Siting Council will take into consideration location preferences provided by the host municipality.

I urge your department to thoroughly review petition 1609 and comment on the proposal to the CT Siting Council by March 7, 2024.

Thank you.

Sincerely,

Eric Fuerst 120 Amanda Drive, Manchester CT, 06040 02/28/2024

From:	Chrissy Gray <chrissymgray@gmail.com></chrissymgray@gmail.com>
Sent:	Wednesday, February 21, 2024 5:27 PM
To:	PZC Comments
Subject:	***SPAM*** 250 Carter Street
Importance:	Low

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

To Whom It May Concern,

I am writing to express concerns regarding the proposed solar farm at 250 Carter St. The proposal would necessitate clearing a wide swath of trees, which seems likely to have a substantial negative effect on the ecosystem of the surrounding area.

Zero-emission, renewable energy sources are an important part of the area's long-term solution to climate change. However, given the forested area, the presence of the Shenipsit Trail and wetlands, and the proximity of the proposal to Case Mountain, it seems this is not the optimal location for a concentrated solar energy production facility.

I would encourage the facility proponents to seek areas that are better suited for the purpose of generating clean energy, especially those that would include repurposing previously developed land that is now unable to sustain wildlife.

Sincerely,

Christina Gray

Chrissy Gray She|Her|Hers www.mypronouns.org

RECEIVED PLANNING DEPARTMENT

FEB 1 4 2024

TOWN OF MANCHESTER, CT

February 11, 2024 25 Birch Mountain Road Bolton, CT 06043

Planning and Zoning Commission

Town of Manchester

41 Center Street

Manchester, CT 06045

RE: 250 Carter Street Solar Development

Dear Commissioners,

After reading the article in the Journal Inquirer about the development of Carter Street solar panels, I felt compelled to write and tell you of my concern. I am unable to attend the public hearing on February 21st and hope you will consider my thoughts.

As an apiarist with hives in the area, I am concerned that the area under the solar panels be pollinator friendly. Seven and a half acres of mowed grass does nothing to help our native pollinators and honeybee populations. I absolutely have nothing against solar panels as long as it doesn't become a waste land.

I'm sure the developers are aware of this fact and making sure a desert of grass doesn't happen would be much appreciated among all the insects that will also populate the area. I know a lot of states have adopted the planting of wildflowers along the highways to encourage our area pollinators and these large solar developers, I'm sure, are aware of this hazard to our environment as well.

Thank you for considering my suggestion and making TRITEC aware of my concern.

Sincerely,

Betty ackin

Betty Aitkin Apiarist

From:	Hollie Reno <shreno@yahoo.com></shreno@yahoo.com>
Sent:	Tuesday, February 27, 2024 5:41 PM
To:	PZC Comments
Subject:	CT Siting Council - Request for Public Hearing and Deny Petition No. 1609
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

I am requesting you Deny the Exception to process Petition No. 1609. Please schedule a public hearing to let the residents and local officials express the many concerns of public, land & wildlife safety, increased pollutants and diminished quality of life this solar farm will introduce in our town. Thank you!

Hollie Reno 63 Branford Street Manchester, CT 06040 "All we are saying is give peace a chance" John Lennon

From: Sent: -	lynn30145@aol.com Wednesday, February 21, 2024 9:20 AM
To:	PZC Comments; sitingcouncil@ct.gov
Subject:	Fw: 250 Carter St Petition 1609 Solar Farm
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

To those concerned:

I do not pretend to understand Solar Farms except for what I have been trying to study to be a little informed regarding them since one of my neighbors found the article pertaining to Petition 1609 referring to the construction of one at 250 Carter St in Manchester. I live on Brookview Circle and feel that the effects of this project could also impact the surrounding neighborhoods near Amanda Dr., Carter St. and Blue Ridge Dr.

I have several questions and concerns. This is "rough" but let me try to convey a few of them to you.

How was this property found?..did the trust that owns it approach TRITEC as they seem to be unable to sell the property? MLS 170405719 I understand that this parcel has been for sale for \$300,000.00 which does not sound like an absorbent amount of money for a parcel of property this size with 1163' of road frontage.

Is the designation "solar **farm**" called that for a reason? I think of a farm as agricultural, forestry, preservation of wetlands and wildlife, etc

Why would you put a solar farm that I see as technically **Industrial** right in the middle of several residential neighborhoods? Just because there is a large parcel available?

Information that I have been able to to find indicate that solar farms are usually constructed on open spaces. Why would we cut down 8 acres of woodland to construct a project such as this? Also, the effectiveness of this type of green energy is the lowest of all others being only approximately 25%. It doesn't seem that the health issues of residents living close by has been adequately studied nor has the effect on property values being effected. Also, the effect on water, wildlife, and the natural ecology of the area in question is very questionable. Some information available indicates that it might be safe to live .5 - 1.5 miles from one of these sites. The neighborhoods around this site are much closer and there is some concern of electromagnetic fields and their effect on residents.

What is the cost to construct and engineer a project such as this and how many years does it take to recoup the investment. Who pays for the project?

It looks like the Town if Manchester owns a piece of property at the end of Amanda that abuts the 250 Carter St. project. . How does the town feel about the Solar Farm?

If The State is anxious to be Energy Green by 2040 and according to the one Google search that I did it owns about 6.7% of the land in CT (approximately 240,000 acres) and wants to eventually increase the ownership to 10% (about another 100,000 acres) Why doesn't the State of CT construct the Solar Farms on its own land? (perhaps it does and I am just not aware of this)

I wonder who is actually benefiting from this project. To me that piece of property is not appropriate to build such a facility and especially if it might cause any type of harm to any of the residents that own all of the property that surrounds it. I, personally, do not feel that there is enough concrete information regarding solar farms to be constructing them is places such as 250 Carter St. All of these residential property owners have contributed to the welfare of this town and State for many years of taxation and other types of contributions and should not be put in this position of perhaps questioning their own welfare if this project is approved.

Thank you for considering my concerns.

Dorothy B. Ralston

From: Sent: To:	Elizabeth Krajewski <m287668@yahoo.com> Thursday, February 22, 2024 7:25 PM melanie.bachman@ct.gov; siting.council@ct.gov; Jay Moran; Sarah Jones; PZC Comments</m287668@yahoo.com>
Cc:	Jay Krajewski
Subject:	Solar Farm Proposal for 250 Cartor Street
Subject:	Solar Farm Proposal for 250 Carter Street
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Hello:

I'm writing to express my strong opposition to the proposed solar farm in Manchester between Amanda Drive, Blue Ridge Drive, and Carter Street.

The following points enumerate my concerns:

- 1. While I do believe in solar energy (we have panels on our own house), I adamantly oppose cutting down trees and replacing them with solar panels. This forested land is sequestering carbon, producing oxygen, and providing habitat and passage ways for local wildlife. It's inappropriate to destroy this land when there are so many other locations that are already devoid of these valuable natural resources and could easily support solar panels. One example is the Manchester Landfill. This area is already cleared, cannot be used for other purposes, and gets plentiful sun exposure.
- 2. Studies have shown that potential buyers may be deterred by the presence of a solar farm, leading to decreased property values for nearby homes. The 250 Carter Street parcel is bordered by homes on all sides. This would have a significant and lasting consequence to our neighborhood due to the visually intrusive alteration of our natural landscape. We most certainly would not have considered our property if a solar farm was adjacent. Our neighborhood has a unique character and identity that we must strive to preserve. The introduction of a solar farm could fundamentally alter the essence of our community, disrupting the values and lifestyle that we hold dear.
- 3. The installation and operation of a **solar farm generates noise and light pollution**. The hum of inverters and other equipment, as well as nighttime lighting, would **create disturbances that affect the quality of life for residents.**
- 4. Studies have raised questions about the electromagnetic fields associated with solar panels and the potential health risks they may pose to nearby residents. As mentioned in point #2, this parcel is bordered on all sides by homes thus potentially **impacting the health and well being of residents**.
- 5. Tritec, the solar farm developer, is based in California as far away as possible. Given their distance and the small size of this solar farm they would have **limited incentive to correct any issues**. When our solar panels stopped working it took nine months and involvement from the Better Business Bureau to get them working again.

In conclusion, constructing a solar farm in residential neighborhood raises significant concerns. It is crucial to explore alternative locations for solar farms that minimize the impact on homeowners, vegetation, and natural habitat. By identifying sites that are less intrusive and disruptive, we can achieve the dual goals of promoting renewable energy while preserving the integrity of our neighborhood.

Thank you for considering these concerns and incorporating them into your actions as if this were proposed next to your own home.

Very sincerely,

Liz Krajewski 295 Carter Street, Manchester CT 860-384-1380

CHRIS POWELL 7 Villa Louisa Road Manchester, Connecticut 06043-7541 U.S.A.

TELEPHONE: 860-646-7383

MOBILE: 860-305-4013

E-MAIL: CXPowell@Yahoo.com

February 13, 2024

Gary Anderson Director of Planning and Economic Development Town of Manchester Lincoln Center, 2nd Floor 494 Main St. / P.O. Box 191 Manchester, CT 06045-0191

Dear Mr. Anderson:

Please accept these comments on the proposal to put a solar farm on approximately 7 acres at 250 Carter St. in Manchester.

Since the site is just a half mile from my house at 7 Villa Louisa Road, I suppose I can be said to have an interest in supporting the project, since it would prevent more housing, people, and traffic in the neighborhood. But housing still strikes me as a far higher use of the land, especially if it is connected or close to sewer and water lines, which I don't know.

Meanwhile Bolton nearby is full of fallow former farm and pasture land without sewer and water lines, land that easily could accommodate many solar farms without having to clear the property.

Since the Carter Street property is forested, even leaving it alone for wildlife also would seem preferable to a solar farm when so much cleared and vacant land is nearby in Bolton. I don't know if any of that land is for sale, but of course at the right price nearly everything is for sale.

If the Connecticut Siting Council is empowered to make the siting decision here, I think it should consider sites in Bolton instead.

With good wishes.

From:	IRENE MULLOCK <imullock@cox.net></imullock@cox.net>
Sent:	Tuesday, February 20, 2024 2:35 PM
To:	PZC Comments
Subject:	solar farm
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Why would you cut down trees that provide oxygen to make a solar farm? Is there no where else to put it? There has to be open space some where that you could put it. Reconsider. It is not a good idea. They are building one in Glastonbury on Hebron Ave but at least they are not cutting down trees for no good reason. Thanks Irene

From:	Janice Cronin <jmcronin2006@yahoo.com></jmcronin2006@yahoo.com>
Sent:	Wednesday, February 21, 2024 2:23 PM
To:	PZC Comments
Subject:	Solar Farm Opposition
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

To Whom It May Concern,

>

> I am writing in opposition to the proposed solar farm development at 250 Carter Street, Manchester.

>

> I appreciate the Committee's collection of local comments to submit to the CT Siting Council and hope you will join me in the opposition to this proposal.

>

> This proposed project includes the deforestation of nearly 8 acres. Wetlands are at risk, as are protected species and all of the wildlife that call this area home.

>

> I fully support the creation of solar farms, however there must be alternative locations for such a project that don't sacrifice our green spaces and wildlife. The state and developers should instead consider brownfields, large scale rooftop options, deserted parking lots, and more, in town and in the surrounding areas.

>

> Thank you for your consideration.Janice Cronin860-796-0193

>

>

>

From:	Joe and Tina Kohut <jtkohut@cox.net></jtkohut@cox.net>
Sent:	Friday, February 23, 2024 11:48 AM
To:	PZC Comments; siting.council@ct.gov
Subject:	(petition 1609)
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Greetings,

I have recently added solar to my residence. I am a strong proponent of green energy in the right context.

I am not a Manchester resident, but I have been informed of a plan to build a solar farm by eliminating trees on property near Case Mountain.

I just want you to reflect on some points that are not in the best interest of Manchester:

- anytime removing trees to add solar makes little sense for the planet

- lack of open space decreases wild animal habitat

- the heat factor and fenced in area is a detriment

- there are plenty of non open space land to use (e.g next to I84/I-384), or in the old Parkade area (albeit not in that area)

- Case Mountain is the outdoor gem of Manchester and there is already much forest encroachment in that area

I believe that towns in general should refrain from developing any remaining open space. Replacing trees with panels as absurd.

Thank you for considering my opinion regarding P.1609,

--Joe Kohut

A resident of South Windsor

From:	Todd Volpe <tdv214@yahoo.com></tdv214@yahoo.com>
Sent:	Wednesday, February 21, 2024 2:52 PM
To:	PZC Comments
Subject:	Proposed Solar Development, 250 Carter Street.
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Dear Planning & Zoning Commission:

I am writing in opposition to the solar development at 250 Carter Street, Manchester.

I am concerned that this proposed project includes the deforestation of nearly 8 acres, including wetlands.

There are alternative locations that should be explored and that will not negatively impact the environment and the Shenipsit Trail, destroy wetlands and wildlife habitat, block the safe passage of wildlife, and negatively impact local residents in a variety of ways.

Unfortunately, local input into matters before the Connecticut Siting Council seems significantly less relevant than the input of industry, DEEP and others.

I appreciate the P&Z Committee taking local input and I hope members will join me and others in the opposition of this project.

Sincerely, Todd Volpe Manchester Resident

From:	Nora Duncan <noralduncan@hotmail.com></noralduncan@hotmail.com>
Sent:	Sunday, February 25, 2024 7:16 PM
To:	Board of Directors
Cc:	PZC Comments
Subject:	Fwd: Opposition to Solar Development on Carter St.
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Good evening...

Formal opposition to the 250 Carter Street Solar project by the Town of Manchester is requested, and critically important to stopping the destruction of Manchester's pristine forested areas.

Many towns are impacted by proposals like this - including several by TRITEC, but I ask you to look to the town of Bethany as an example of excellent town and private efforts in a similar case: https://portal.ct.gov/CSC/3 Petitions/Petition-Nos-1501-1600/PE1583

Bethany is a small town with about 6,000 residents. They have shown leadership that Manchester should emulate. Manchester's size and resources gives it an advantage Bethany does not have.

Please do what's right for the residents of Manchester and consider all administrative and legal options available to the town to stop this project. There are many options for a solar project like this to locate that do not have the significant impact on both the environment and residents of this town. Stop the clear cutting, damage of wetlands, negative impact on property values, and the complete destruction of wildlife habitats. It's unnecessary.

I want to also be clear that I live on Dennison Ridge, so this is not about my personal property value. I have no objection to CT's efforts to meet their green energy goals. This is near me, but not NIMBY. Many people care deeply for a variety of reasons. Join us!

Nora Duncan

Begin forwarded message:

From: Nora Duncan <noralduncan@hotmail.com>
Date: February 19, 2024 at 6:10:46 PM EST
To: pzccomments@manchesterct.gov
Subject: Opposition to Solar Development on Carter St.

Dear Planning & Zoning Commission:

I am writing in opposition to the solar development at 250 Carter Street, Manchester.

Creating "green" energy should never involve deforestation and risking wetlands and the protected species that live there.

It's difficult to believe that there are not other locations that would not result in nearly 8 acres of deforestation and harm to wildlife. DEEP's mitigation recommendations seem complicated, prescriptive and avoidable by the selection of a different site.

California based for profit TRITEC Americas must have alternatives available that will not so negatively impact the environment, block the safe passage of wildlife, destroy wildlife habitats, devalue the Shenipsit Trail, and negatively impact local residents.

Maybe this is the least expensive local option for them, delivering the highest profit? They have six petitions pending with the CT Siting Council as of today. I don't pretend to be knowledgeable about their business model, but this should all be considered by the Connecticut Siting Council.

I hope members of the Planning and Zoning Committee, and members of the Board of Directors, will join me and others in the opposition of this project

Nora Duncan Manchester Resident

From:	Jonathan Testa <jtestatoyota@gmail.com></jtestatoyota@gmail.com>
Sent:	Tuesday, February 20, 2024 2:04 PM
To:	PZC Comments
Subject:	***SPAM*** Envriomental facts?
Importance:	Low

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Solar farms are toxic for the environment, and very dangerous to wildlife. Please save it for your roof or your own property. Trees breathe CO2.

From:	Nicole Lemoine <nmlemoine@hotmail.com></nmlemoine@hotmail.com>
Sent:	Tuesday, February 20, 2024 4:24 PM
To:	PZC Comments
Subject:	Planned solar panel field
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

I am a resident of Manchester and live in an area adjacent to the area near Amanda Drive and Carter street where a solar panel field is being considered. I strongly object to the destruction of 7 acres of land for solar panels. There are many commercial areas already available for this kind of project. For instance, there is the mall parking lot, college campuses, and other already developed areas. Another great suggestion is the huge abandoned area behind the Parkade shopping center. None of those areas would have the same impact as here, where numerous wild animals live and there is an established ecosystem.

All the efforts to "go green" seem to be in an effort to preserve green spaces and the environment. How ironic you would consider furthering that mission to create solar power by destroying the wildlife area you want to protect. I will go to all necessary meetings and share with all necessary officials my opposition to this development plan. You have other more practical options. Go for one of them. Leave the woods alone in our neighborhood! I am available to speak in person as well. The only reason I can't be there for this session is because this information was not well publicized and I only found out at the last minute from my neighbor who just happened to hear about it on facebook. It's easy to see why you would not want everyone most impacted to share their perspective, as you probably already imagined you would not have much support.

Nicole Lemoine 299 Dennison Ridge Drive Manchester, CT 06040 860.480.0167

From:	marie u <marieurbanetti@gmail.com></marieurbanetti@gmail.com>
Sent:	Thursday, February 22, 2024 3:16 PM
To:	PZC Comments
Subject:	***SPAM*** CT Siting Council Petition NO: 1609
Importance:	Low
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Leaders,

It is futile to have a clean environment with unhappy residents. Residents in the neighborhood adjacent and close to 250 Carter Street are very unhappy with the proposed 0.999-megawatt AC solar photovoltaic electric generating facility in our residential community.

This letter is to request a public hearing on this matter, and denial of the exception to the full process. It also expresses my opposition to Petition NO, 1609 and why:

1.

2.

3. Habitat Degradation:

- 4. The proposed site is a wildlife habitat for many species, including the endangered box turtle. DEEP's own report Appendix C, mentions States Special Concern for the box turtle and its habitat at the proposed site and lays out the complex protection measures
- 5. they recommend. The land also serves as a corridor for animals including deer, turkeys, fox, and coyote to pass between larger wooded areas and not be forced to pass through our yards where our children and pets play.
- 6.
- 7.

8.

9. Environmental Concerns:

- 10. The proposed site is already very wet. We can often hear water running through the storm drains on our street, Blue Ridge Drive long after the last rain storm. Clear cutting land increases runoff and even with the proposed mitigation there is concern it is
- 11. not sufficient to handle the potential load and contamination that could occur if the system is overloaded or fails.

12.

3.

- 4.
- 5. Health:

- 6. According to various research and a 2023 Environmental
- 7. Impact Report in California indicate that the distance is approximately.
- 8. 5 miles to 1.2 miles
- 9. from a solar farm, however, long term research (over 20 years) has not been conducted on the impact to property values or environmental or personal health.Jan
- **10.** 5, 2024

11.

We did not purchase our homes in this neighborhood to become Green Energy Guinea Pigs.

- 4.
- 5.
- 6. Safety issues:
- 7. Including but not limited to
- 8.
- ٠
- •
- Nearby Natural Gas Pipeline could a stray electrical arc cause a fire or explosion
- with potentially life threatening consequences?
- •
- •
- •
- Glare to overhear aircraft
- •
- •
- ٠
- Noise
- •
- •
- •
- Danger to wildlife
- •
- ٠
- •
- Creating a lot of heat / WildFires
- •
- •
- •
- Adverse effects on native vegetation and wildlife (habitat and migration)
- •
- •
- ٠
- Interference with rainfall and drainage
- ٠
- •
- •
- Direct contact causing injury or death
- •

7. Property Values:

- 8. Our very desirable neighborhood will be much less so with an electric generating facility so close by. Property values will surely decrease if Petition NO, 1609 goes forward. Some neighbors may be forced into financial distress because of it.
- 9.

"...the journal <u>Energy Policy</u>, found that home prices decreased 1.5% on average for properties within 0.5 miles of a utility-scale solar project compared to properties located 2 to 4 miles away from the solar farm. The average decline is around 2.3% for homes closer to the solar farm, within a 0.25-mile radius."

Thank you for your thorough consideration of this proposal and its negative impact on the local community.

Sincerely,

Marie Urbanetti

Marie Urbanetti 213 Blue Ridge Drive Manchester, CT 06040 (860) 593-0694 | <u>marieurbanetti@gmail.com</u>

From:	leslie frey <lesliefrey@icloud.com></lesliefrey@icloud.com>
Sent:	Wednesday, February 21, 2024 7:59 AM
То:	PZC Comments
Subject:	Solar farm proposal

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Dear PZC,

Please vote NO on the proposed solar farm!! Please do not allow 8 acres of Forrest to be destroyed!!

Leslie Frey 30 Florence St

Katie Williford	/
From: Sent: To: Subject:	Megan Pilla Thursday, February 29, 2024 9:31 AM Katie Williford FW: ***SPAM*** CT Siting Council Petition 1609 - Opposition
Importance:	Low
Follow Up Flag: Flag Status:	Follow up Nagged
From: David Laiuppa <dlaiupp Sent: Thursday, February 29, To: Megan Pilla <mpilla@mar Subject: FW: ***SPAM*** CT Importance: Low</mpilla@mar </dlaiupp 	2024 9:13 AM
See below	
David Laiuppa Environmental Planner / Wet Planning and Economic Devel 494 Main Street Town of Manchester, CT 0604 (860) 647-3046	opment

From: K Fuerst <<u>katie.handschuh@gmail.com</u>>
Sent: Thursday, February 29, 2024 12:05 AM
To: David Laiuppa <<u>dlaiuppa@manchesterct.gov</u>>
Subject: ***SPAM*** CT Siting Council Petition 1609 - Opposition
Importance: Low

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Mr. Davis Laiuppa Manchester Planning and Zoning COmmission/Inland Wetlands Agency 494 Main Street Manchester, CT 06040

Mr. Davis Laiuppa

My name is Katie Fuerst, I am a Manchester resident and property owner on Amanda Drive. I am writing to inform you of <u>PETITION NO. 1609</u> with the CT Siting Council for a proposed solar facility **and ask for your department to review and comment on this proposal.**

Please submit your comments and notes to the CT Siting Council by March 7, 2024 at siting.council@ct.gov; melanie.bachman@ct.gov.

The proposed 0.999 MW solar farm lies between two residential neighborhoods in an area popular with nature lovers and hikers. Because of the rural nature of this area, wells and septic tanks are common and could be adversely affected by pesticides to be used when they clear and maintain the solar facility.

If this TRITEC Solar Farm Proposal is permitted to move forward in this location, it will destroy the quality of our neighborhoods. Property owners do not want to see or hear a solar farm in their backyards. This solar farm will be unsightly, contaminate the soil and ground water, cause flooding homes due to redirection of stormwater runoff and lower our property values.

The proposed location has risks to surrounding residents. There currently is a gas line that passes through the property which would run in close proximity to this solar farm. If there is a fire, it would cause substantial damage to the woodlands and the neighborhoods. Our first responders would not only have to deal with a solar fire but a possible wildfire not to mention the danger of the gas line. It could also cause an evacuation of the surrounding areas.

The constant noise pollution from the power inverters would be a nuisance to the neighboring homeowners, pets and the wildlife that live in the woods. Residents near East Windsor solar farms have had noise complaints go unanswered.

Trees and our wetlands do so much for our environment. In pursuit of climate initiatives, we should not be destroying one environment in favor of another climate solution. We should not be cutting down 7.8 acres of woodlands and wetlands and adversely affecting our wildlife which includes the eastern box turtle which is on the State species of special concern list. There are a number of other locations throughout Connecticut that would be better suited for a solar farm. Residential and woodlands should never be considered.

This is particularly true when the proposed site is uphill from wetlands and residential dwellings. The Petitioner's stormwater management proposals would significantly disrupt the above and below ground water flows to one or more of the wetlands placing the vital resource in jeopardy. At the same time, the stormwater management proposals would cause a great risk and potentially severe unintended consequences to both the ecology of the hillside and the residential dwellings that lie below the proposed infiltration basin including its overflow outlet.

In conclusion, ugly chain-link fencing, toxic herbicides, towering electric poles, excessive lighting, noisy megawatt converters, maintenance truck traffic, and chemical cleaning agents will cause irreparable harm to the neighborhood and to the environment.

I urge your department to thoroughly review petition 1609 and comment on the proposal to the CT Siting Council by March 7, 2024.

Thank you.

Best regards,

Katherine Fuerst

120 Amanda Drive Manchester, CT

From: Sent: To:	rdcarroll01@aol.com Tuesday, February 13, 2024 1:07 PM Jay Moran; Sarah Jones; Ed Boland; Zachary Reichelt; Jessee Muniz-Poland; Peter Conyers; Dennis Schain; Jerald Lentini; Planning Department; rdcarroll01@aol.com
Subject:	Proposed Solar Farm on Carter St
Follow Up Flag: Flag Status:	Follow up Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

Good afternoon! Please help stop the proposed solar farm on Carter St. I'm also contacting my state reps and the Governor. I will also notify all of my neighbors and surrounding streets of this proposal. Unfortunately, there isn't much time since the planning and zoning meeting is scheduled for 2/21. I just learned about this yesterday, so I am doing my homework on this snowy day.

This is a residential area. There are day cares, farms and houses surrounding this wooded area. This will bring down the property values in our neighborhoods. In addition, I have environmental and health concerns.

In Litchfield when a solar farm was proposed near a residential area, there were concerns for water quality, wild habitat, property values and zoning regulations. Some of my neighbors have well water.

In East Windsor, a solar farm was built near a residential community and there is consistent noise coming from the solar farm.

As my elected officials, I need your help to stand up for my rights and my neighbor's rights as homeowners and residents of Manchester.

This is not an appropriate location to have a solar farm. Any help would be appreciated. Please feel free to reach out to me.

Attached is the article on the proposed solar farm. Manchester forest land could be cleared for 7.8-acre solar farm (ctinsider.com)



Solar developer eyes Manchester forest near residential area for 7.8-acr...

Joseph Villanova TRITEC Americas petitioned the Connecticut Siting Council to install a facility with over 2,500 panels in a fore...

Thank you, Rose Carroll 21 Brookview Circle Manchester 860-682-2953 Thank you for considering my comments concerning the proposed solar facility at 250 Carter St., Manchester, CT (Petition No. 1609).

The site TRITEC has chosen for their solar project is categorized as "Small Core Forest," which are especially important for people living in urbanized areas. Urban small core forests provide many benefits including clean air and water, wildlife habitat, carbon sequestration and storage, energy savings, and public health benefits while providing an identity for the community. Urban forests provide essential ecosystem services to perpetually growing urban populations in the United States, making them an integral component of cities, municipalities, and communities. This project site is just a little over 1.5 miles from an Environmental Justice Block Group. All the more reason to preserve this small core forest. Please consider:

- This loss of 7+ acres of core forest land in an urbanized town is very costly when you consider the value of ecosystem services provided. In 2021, The U.S. government updated ecosystem service value of forestland. Aesthetic value, air quality, climate regulation, erosion control, existence value, flood hazard risk protection, water filtration...all total to \$12,589/acre/year. Multiply that by 7+ acres, and we have a loss to the community of \$151,068 per year.
- And it's not just these 7 acres that are at risk. Any time you fragment a contiguous forest you create more "edge" habitat that attracts more "edge" species such as invasive plants and nest parasites/predators, you adversely affect microclimate conditions (e.g., light, temperature, moisture) along the edges and a distance (often as much as 50 meters) into the remaining forest, and you increase competition from invasive species, and it often results in a higher intensity of browsing from herbivores and other disturbances that favor weedy plants.
- Once these 7+ acres of core forest are destroyed, there is no "restoring the site to its condition before construction," as stated in TRITEC's Decommissioning Plan.
- This community does not need this proposed facility. According to Residential Renewable Energy Solutions program 2023 data, Manchester is doing just fine with solar power and helping the State achieve its clean energy goals. We are second in the entire state in solar system capacity (3068 kW). Only Bristol (3945 kW) has a higher capacity

Keeping as much forest as forest is the overarching goal of Connecticut's 2020 Forest Action Plan. Approving this project would, in my opinion, contradict the State of Connecticut's 2020 Forest Action Plan. Since this site is a "core forest," it is listed as a priority area in the 2020 Forest Action Plan, with a "Priority Area" score of 2.

Finally, I would like to know why a small core forest was chosen as the project site instead of an already ecologically compromised site. Did TRITEC ever consider alternative properties that would be more in line with solar siting best practices?

Sincerely, Michael O'Donnell 114 Delmont St. Manchester, CT TRITEC Solar Farm Proposed for 250 Carter St.

Comments from Ray & Elaine Welnicki, 121 Amanda Dr.

The solar farm is proposed to be sited on a hill above the properties on the east side of Amanda Drive. We have several concerns about this proposal as currently described by the Petitioner.

1. Stormwater Infiltration

The Petitioner addresses stormwater management in its petition. The Stormwater Management Report included in the petition indicates that stormwater runoff from 12.702 acres will be diverted to an infiltration basin at the northwest edge of the solar panel field. From the diagrams included in the petition, it appears that this basin will cover an area of less than one acre. So essentially the petitioner proposes to divert stormwater runoff from 12.702 acres to an area that is less than 1 acre, thus concentrating all of the stormwater infiltration to one small area.

Consider what this means. Our understanding is that an inch of rain produces 27,000 gallons of water per acre. So a 1-inch rainstorm would generate 342,954 gallons of water across the 12.702 acre drainage area proposed in the petition. Similarly, a 3.16-inch rainstorm (i.e., a 2-year storm event according to the petition) would generate 1,083,735 gallons of water across the drainage area, most of which will channel into the drainage basin. Today, all rainwater that falls within the 12.702 acre drainage area either infiltrates the soil across those 12.702 acres or runs off down the hill at various locations. But under the petitioner's proposal, most of that water will infiltrate the soil below the infiltration basin. So the Petitioner would accomplish the stormwater reduction that it claims by greatly increasing the amount of soil infiltration at a concentrated location. And that location happens to be above several of the homes along the east side of Amanda Drive, including ours.

This is very significant because the petition makes no mention that of exfiltration – i.e., the release of subsurface ground water to the surface. Most of the properties along the east side of Amanda Drive experience exfiltration of water that seeps and even pours out of the ground at the base of the hill upon which the proposed solar farm would be constructed. This is because stormwater that infiltrates on the hillside seeps into the ground vertically but as it reaches impermeable soil and rock ledge it courses down the hill below the surface until it approaches the base of the hill. The water then exfiltrates out of the soil and, if not channeled elsewhere such as by a French drain, pools along the ground.

When we purchased our home at 121 Amanda Drive in July 2013, we knew that there was a wet spot about 25 feet directly behind our house even in the early summer. The property had a French drain along the base of the hill but it was clogged and so we replaced it with a more effective system. Before we did that, we had 3 or 4 noticeable streams of water coming out of the ground about 10 or 15 feet uphill. The water would

cascade down from that point until it reached the French drain. In April of 2014 we measured the flow of water at one of these cascades. We found that it took 9 minutes to fill a 5-gallon bucket of water. This translates to a rate of 33 gallons per hour or about 800 gallons per day. The other cascades were of lesser volume but we figure that we were experiencing 1,000 - 1,200 gallons of water per day exfiltrating from the base of the hill. And the base of that hill is only about 20 feet from our house.

So it would be logical to expect that the amount of water exfiltrating from the hill behind our property and the properties of our nearest neighbors will greatly increase because of the hundreds of thousands of gallons of stormwater that will be channeled to the infiltration basin on the hill directly behind our properties. After all, today the area where the infiltration basin will be located gets at most 27,000 gallons of water in a oneinch rainstorm (assuming the infiltration basin will cover one acre, which is likely an over estimate.) If the petition is approved as is, a one-inch rainstorm will channel more than 10 times that amount into that area, all of which will infiltrate down and eventually exfiltrate at the bottom of the hill directly behind our house and the houses of our immediate neighbors. And our house sits a mere 20 feet away from the base of the hill which puts us at significant risk that the additional water concentrated in this area overwhelm our French drain as well as the curtain drain by our foundation. We should not have to live with this risk and we believe it will certainly diminish our property value.

It is essential that the Siting Council address this concern. We propose two possible solutions. First, the Petioner could be required to relocate the proposed infiltration basin to the south of the solar farm. That would place it at the greatest distance from homes on Amanda Drive. The water that infiltrates from that point would have be able to course underground over a much dispersed area before it ever reaches any occupied property. A second alternative would be to require the Petitioner to develop a storm drain/storm sewer system to handle the runoff. If the Siting Council nevertheless approves the location of the infiltration basin it should at the very least require the Petitioner to hire qualified contractors to install new or upgrade existing French drains at the base of the hill for the homes that are at greatest risk of having increased exfiltration flows.

2. Stormwater Runoff

We are also concerned about the potential for the infiltration basin to fail. The EPA at https://www.epa.gov/system/files/documents/2021-11/bmp-infiltration-basin.pdf indicates that:

"In most areas, infiltration basins experience high rates of failure when treating too large a drainage area. In general, they best apply to relatively small drainage areas. Less than 5 acres is ideal, but less than 10 can be acceptable under the right conditions."

So the petition proposes an infiltration basin that drains an area that is 250% of the maximum ideal size and 125% of the greatest acceptable size. This fact alone should give

the Siting Council pause to question the viability of the Petitioner's stormwater management proposals.

We have additional concerns about how the infiltration basin will be managed over time. Any neglect could lead to a compromised basin that does not drain properly. Any water that remains in the basin for longer than 3 days will almost certainly become a breeding ground for mosquitos. Can we be certain that the Petitioner will monitor the infiltration basin after each rainstorm to make sure it drains properly? And who will monitor the Petitioner to see to it that this happens? A parallel situation is where Eversource or other utilities failed to properly trim trees near power lines despite their assurances that they had a plan in place to do so.

Failure of the infiltration basin to work exactly as planned – through inadequate maintenance, poor design or some other cause – could lead to a dangerous overflow situation. As noted earlier, over 1 million gallons of water would fall over the 12.702 acre drainage area in a 3-inch rainstorm (a two-year expected storm event). Much of that large amount of water would be channeled to the infiltration basin and, if the basin fails in some way, an incredible amount of water could cascade down the hill towards our house which sits directly below the proposed infiltration basin as well as towards the homes of our neighbors.

Possible solutions here once again would be to relocate the proposed infiltration basin to the south perimeter of the drainage area or to construct a storm sewer system. If the Siting Council does not impose one of those requirements (assuming it even approves the poor location site for this entire project) then it should require that the Petitioner secure flood insurance in an appropriate amount for the 4 to 6 homes that are at the greatest risk of suffering damage due to a failure of the infiltration basin.

Overall, we cannot imagine why the Petitioner would think that 250 Carter Street is an appropriate site for a solar farm given the existence of several wetlands on the property and the fact that no stormwater management solution – other than perhaps a storm sewer system – would provide fail-safe protection to the homes that sit on the bottom of the hill below the proposed solar farm. Surely there are better sites in the Town of Manchester that could be considered or sites in nearby towns that are not on a hill with wetlands above residential dwellings. I would think that the Petitioner should discuss siting a solar farm at the town Transfer Station. I don't know whether any of the land there would be usable for a solar farm but perhaps it could be discussed.

Rosemary Carroll, 21 Brookview Circle, Manchester CT.

Re: Opposition to Petition 1609 - Carter St Solar Farm

First of all, I would like to thank you for listening to our concerns.

As I researched solar farms and read over the 1609 Petition and documentation, there are a number questions and concerns I have. One thing that I do not understand is how a company from California and an unelected state agency with no vested interest in Manchester dictates what can be done in our town. It should be the other way around. Our local elected leadership and the local planning and zoning should be the final decisionmaker on a project of this magnitude. I've written to our state representation to discuss legislation and best practices regarding solar farms in residential neighborhoods. I encourage everyone to contact your state representatives and the governor to change this decision-making process.

1. Major concern:

- Tritec Americas is asking to waive the facility's exclusion from Council jurisdiction because the project is under 1 Mega Watt.
 - Jurisdiction: <u>Permit Information for Solar Projects</u> Section 10 of the Ct Dept. of Energy and Environmental Protection Fact Sheet states: the CT Siting Council only has jurisdiction over projects of 1 Mega Watt. Local/municipal review is needed. This project is .999 mega-watt. This is a gray area of jurisdiction. To me, I interpret that the local planning and elected municipal elected leadership has final jurisdiction.
 - We must require a full analysis and public input before anything is built.

2. Questions that need to be answered?

- Policy and procedures for maintenance and complaints
 - If the solar farm is approved, who monitors ongoing maintenance, resolves complaints and issues regarding the solar farm? Are there procedures and response times to the complaints? Does the solar company get fined if they do not respond in a timely manner and resolve the issue?
- Homeowner rights:
 - What rights do the homeowners have if there is a toxic situation or damages from the installation, etc.? For instance, wells get contaminated. There are properties near the site with well water and septic.
- Expansion:
 - What happens if they want to expand the number of panels? Does the Siting Council then have free will to approve this and add panels? Does it go through planning and zoning in Manchester? Are there process and procedures? Are they followed? Are residents surrounding the solar farm notified of the expansion?

- Decommissioning of Solar Farms:
- Is a bond or trust needed before the project is started? Who will oversee the decommissioning and decide if the plan is sufficient?
 - Source:
 - Per CT Department of Energy and Environmental Protection Guidance and the Siting Council – "Decommissioning means when a solar facility will be closed, all photovoltaic equipment is completely removed, and the land is restored to its original condition. The Connecticut Siting Council requires a decommissioning plan to be submitted as part of any Application or Petition. The developer should be responsible for decommissioning costs." <u>DRAFT-Guidance-for-Siting-Solar-on-Agricultural-Land.pdf (ct.gov)</u>

3. Noise Pollution:

- There is an issue with a high pitch ringing noise coming from the solar farm inverter in East Windsor. Complaints have gone unanswered by the developer.
- Will a noise study be done? Is the proposed buffer sufficient?
- Are there procedures and response times put in place for residents if there is noise pollution?
- Are there fines if the Solar company does not respond to the complaints within a timely manner?
 - Source:
 - <u>Noise complaints risk souring CT community on solar energy</u> (ctmirror.org)
 - <u>East Windsor solar farm leads to complaints from residents, officials</u> (ctinsider.com)
- 4. Fire Hazard and health concerns:
 - The location of the solar farm poses a fire threat to residents, residential properties the woodlands and wildlife.
 - Also, there are no reliable statistics for solar fires other than what is provided in the news because of the way the fires are categorized. Current insurance documentation uses the "Other" category for solar fires.
 - Last Year, New York state had 3 solar farm fires. Governor Hocul had the resident's shelter in place within a one-mile radius because of toxic fumes. She set up a task force to create best practices for first responders. One item that the first responders were concerned about was using the foam on the electrical fire because the chemicals could seep into the ground water.
 - Are there procedures in place with state and local emergency response teams to handle fires or damages to solar farm?
 - Is Manchester now required to fund the fire department to handle these types of fires?

Source:

- <u>Solar farm fire in Upstate New York sends possible toxic smoke billowing</u> into surrounding community - CBS News
- <u>After three fires this summer at commercial battery storage facilities in</u> <u>N.Y., Hochul creates working group for safety investigation -</u> <u>RiverheadLOCAL</u>
- Fire a major hidden danger for solar farms | Insurance Business America (insurancebusinessmag.com)
- 5. Endangered Wildlife and Environmental Concerns (Groundwater, pesticides and other disturbances especially during installation and ongoing maintenance):
 - Disturbing wildlife and cutting down acres of trees is frowned upon by environmental experts and is deemed not helping our environment.
 - Will the solar company use pesticides to keep the weed growth down around the panels?
 - The Eastern Block Turtles live in these woods. Recommendation from DEEP is not to move endangered and concerned species from their habitat.
 - Source: <u>Chapter 495 Endangered Species (ct.gov)</u>
 - Shepinsit Hiking Trail:
 - This trail uses these woodlands. The trail crosses conservation lands protected by the Kongscut Land Trust and the Manchester Land Trust.
 - Although the engineering firm doing the study for Tritec states that the dense forest will block the site, what happens in fall and winter when leaves are off the trees?
 - Source: <u>Shenipsit Trail Connecticut Forest and Park Association</u> (ctwoodlands.org)

6. Property Values

- Lower property values.
 - Source:
 - <u>Solar's Impact on Rural Property Values (asfmra.org)</u> A 2021 study from the University of Rhode Island looked at 400,000 transactions in New England over the course of 15 years, finding that suburban residential property values suffered negative impacts when nearby solar farms replaced resources perceived as scarce, such as green space.
 - There were a number of other studies completed with the same negative impacts. For instance, it could have an aesthetic impact on your neighborhood. What Is a Safe Distance to Live from a Solar Farm? <u>Climate Cafes</u>

I am not opposed to solar farms but I am opposed to solar farms in residential areas.

Thank you

From:	Sandy Jeamel <sjeamel@cox.net></sjeamel@cox.net>
Sent:	Friday, February 23, 2024 5:37 PM
To:	PZC Comments
Subject:	Petition #1609 /solar facility Carter Rd
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

This is Sandy Jeamel. My family lives at 29 Jenny Cliff in Manchester. We are directly across from where the solar panel facility is being considered. We have lived at this location for over 25 years and have enjoyed the forest scenery of the mountain. Placing a solar facility here will create an eyesore six months out of the year when the leaves are off the trees, decrease our property value, and decrease the wildlife habitat. I oppose this facility being built here. Thank you.

From:	Sarah Connors Carter <smc51076@gmail.com></smc51076@gmail.com>
Sent:	Sunday, February 18, 2024 2:51 PM
To:	PZC Comments
Subject:	Proposed Solar Farm on Carter St
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE - Don't just click it, put in a ticket!

My name is Sarah Carter. I live at 262 Blue Ridge Dr. I have a few questions about the proposed Solar Farm. While I am not wholly opposed to the project, I have several questions that I would want answered and addressed if any other development were to be proposed.

1. Has the impact on wildlife and effect on drainage been studied for this particular property? What is the plan to mitigate negative impact to both things? Blue Ridge Dr has well water and septic. Is there any aspect of the construction that could jeopardize either, particularly since sewer and city water are not available in the event that the ground becomes contaminated?

2. A similar solar farm in East Windsor has yielded complaints about a constant humming noise coming from the panels. What is the plan to mitigate any disturbance to the respective neighbors? How close to respective property lines will the panels be to property lines on both Blue Ridge Dr and Amanda Drive? How many houses on each road will be affected? Will a fence be erected to mitigate noise such as what is put up on highways to deaden noise to adjacent properties?

3. I am also curious about fencing to keep animals and children out of the solar array. People and animals do sometimes walk through the woods. Is there a plan to address this issue?

4. There is a gas pipeline that runs through that property. What would be the plan should the gas company that owns the line need access in the event of an emergency? Is there any risk of disturbing the pipeline in that area?

Is there a plan available for neighbors to view of the proposed Solar Farm?

Thank you for your time, Sarah Carter