



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

March 19, 2024

TO: Service List, dated February 21, 2024

FROM: Melanie Bachman, Executive Director *MAB*

RE: **PETITION NO. 1615** – C-Tec Solar, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 3.98-megawatt AC solar photovoltaic electric generating facility located at the former Hartford Landfill at 180 Leibert Road, Hartford, Connecticut, and associated electrical interconnection.

Comments have been received from the Connecticut Department of Energy and Environmental Protection on March 18, 2024. A copy of the comments is attached for your review.

MAB/IN/dll

c: Council Members

March 18, 2024

Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: 3.984-MW Photovoltaic Generating Facility
C-TEC Solar LLC
Hartford, Connecticut
Petition No. 1615

Dear Members of the Connecticut Siting Council:

Staff of this department have reviewed the above-referenced Petition for Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need will be required for the construction of a 3.984-MW photovoltaic generating facility on a 13.75-acre parcel atop the Hartford Landfill at 180 Liebert Road in Hartford. The site served as part of the City of Hartford municipal landfill until it ceased accepting waste in December 2008. Its formal closure was completed in February 2015. A field review of the site was conducted on March 5, 2024. Based on these efforts, the following comments are offered to the Council for your consideration in this proceeding.

As in other recent DEEP comments concerning photovoltaic generating facilities, we note that the construction of facilities such as that proposed in this petition will aid in the achievement of Connecticut's vision for a more affordable, cleaner, and more reliable energy future for the ratepayers of Connecticut. Bringing more zero carbon energy projects on line is instrumental in furthering this vision, as these resources help diversify the regional fuel mix and aid in achieving a 100% zero-carbon electric sector by 2040 as required by Connecticut General Statutes Sec. 22a-200a(a)(3). Developing grid-scale renewables is also imperative to the state's success in achieving its statutory goal of reducing carbon emissions by 45% below 2001 levels by 2030 and by 80% below 2001 levels by 2050.

Further, the use of former landfill sites, such as the host site for this facility, is strongly encouraged by this department as a way to put such sites back into productive use while adding generating capacity at sites that involve only very modest environmental impacts.

Site Description

Much of the top of the Hartford landfill is covered by an artificial synthetic turf which spreads both beneath the existing solar facility and on the project site of the proposed new solar farm. Overall, this artificial turf is in good condition, though both ant hills and moss penetrate the turf in numerous locations. Grass turf abuts the artificial turf to the west and north and is well established and dense. No signs of erosion were observed in the grass turf, either north of the project site extending all the way to the wetland complex north of the landfill, or to the west of the access road which runs north-south along the very top of the landform. Observations of

the grass turf to the west of the access road were confined to those areas visible from the access road.

To the east of the project site, slopes drop off very rapidly and uniformly, with the artificial synthetic turf extending to the lower of the two lateral drainage channels running along the east side of the landform. Though steeply pitched, the artificial turf is in excellent shape on this slope, which is beyond the limits of the proposed solar panels installations.

Despite fencing around the landfill, four deer were observed ascending the landform from the east, north of the extent of the artificial turf.

There is no potential for impacts from the new solar field to the wetlands to the north of the landfill. The landform drops down to the north of the project site, then rises up again to new high ground, before descending to the wetland complex. Although runoff from the new solar facility will, by and large, drain to the east, any flows to the north will be intercepted in the saddle north of the facility and drain thence to the east or west.

Noise and Visibility

As noted earlier, the north-south access road runs along the very crest of the landfill. The proposed solar facility will be located just east of the access road and landform crest on ground that slopes ever so gently to the east. Highway noise from Interstate 91 declines very noticeably as you proceed eastward from the access road. Similarly, any visibility of the solar panels from neighborhoods west of the landfill is likely to be totally obscured by the topography. If there is any marginal visibility of the westernmost panels, it would be quickly lost for the panels beyond the westernmost edge of the facility. Visibility of the panels from across the Connecticut River to the east would be negligible due to the low profile of the panels and racking, the distance to any viewpoints east of the river, and the significant topographical change from the top of the landfill to the east bank of the river.

Construction Stormwater Management

Construction projects involving five or more acres of land disturbance, including this one, require either an individual NPDES discharge permit from DEEP or they may register for coverage under the Department's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (DEEP-WPED-GP-015). C-TEC is familiar with this requirement, both from past projects and from the Pre-Application meeting held with the applicant on December 21, 2023. To date, DEEP has not received a registration submission for the General Permit for this project.

Landfill Disruption Authorization

This project will require an Authorization for Disruption of a Solid Waste Disposal Facility. C-TEC Solar submitted its request for an Authorization for Disruption of a Solid Waste Disposal Area in February 2024, and that submittal is currently under review.

Miscellaneous Petition Commentary

Though the City of Hartford owns the landfill, DEEP manages all aspects of the landfill's maintenance and environmental compliance.

DEEP reiterates its support for this proposal as a minimally impactful, beneficial reuse of a former landfill and a source of renewable, non-polluting, carbon free electricity.

One minor discrepancy in the C-TEC submittal should be clarified. The Environmental Assessment submitted for this petition describes the facility as having a generation capacity of 3.38 MW. The petition lists the facility as having an output capacity of 3.984 MW.

Thank you for the opportunity to review this petition and to submit these comments to the Council. Should you or Council staff have any questions, please feel free to contact me at (860) 424-4110 or at frederick.riese@ct.gov.

Respectfully yours,



Frederick L. Riese
Senior Environmental Analyst

CC: Katie Dykes, Commissioner