



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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VIA ELECTRONIC MAIL

May 8, 2024

Thomas Parlapiano, Chair
Hamden Tree Commission
Hamden Government Center
2750 Dixwell Avenue
Hamden, CT 06518
twparlapiano@aol.com

RE: **PETITION NO. 1627** – LSE Libra LLC (Lodestar Energy) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.5-megawatt AC solar photovoltaic electric generating facility and associated equipment located at 410 Denslow Hill Road, Hamden, Connecticut, and associated electrical interconnection.

Dear Chairman Parlapiano:

The Connecticut Siting Council (Council) is in receipt of the Town of Hamden's correspondence dated May 7, 2024 concerning the above-referenced petition. Thank you for taking the time to provide the Council with the comments.

This petition will be placed on a future Council meeting agenda for discussion and decision. Please note that you can view all of the documents related to this petition on our website at portal.ct.gov/csc under the "Pending Matters" link. You may also keep apprised of Council events on the website calendar and agenda.

Before reaching a final decision on any petition, the Council must carefully consider all of the facts contained in the record that is developed by the Council, the petitioner, parties and intervenors to the petition, and consider all of the concerns received from members of the public who submit written statements to the Council.

Copies of your correspondence will be distributed to the service list for the petition.

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

Sincerely,

Melanie A. Bachman
Executive Director

MAB/RDM/dll

c: Service List dated April 12, 2024
Council Members

From: twparlapiano@aol.com <twparlapiano@aol.com>

Sent: Tuesday, May 7, 2024 8:31 PM

To: CSC-DL Siting Council <Siting.Council@ct.gov>

Cc: lgarrett@hamden.com; rlion@hamden.com

Subject: Objection to Petition 1627 – LSE Libra LLC

Attached please find an objection to Petition 1627 submitted by the Tree Commission of the Town of Hamden. The letter was approved at a special meeting of the Commission on April 30.

Respectfully submitted on behalf of the Commission,

Thomas Parlapiano, Chair

Tree Commission Town of Hamden

May 7, 2024

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

Re: PETITION NO. 1627 – LSE Libra LLC (Lodestar Energy) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.5-megawatt AC solar photovoltaic electric generating facility and associated equipment located at 410 Denslow Hill Road, Hamden, Connecticut, and associated electrical interconnection

Ms. Bachman and Honorable Members of the Siting Council:

After a review of the Petition, the Hamden Tree Commission opposes this proposal to clear almost 8 acres of forest to install a solar farm at 410 Denslow Hill Road in Hamden. Clear cutting the forest will have a negative impact on biodiversity as well as air and water quality.

The value of forested land, in terms of overall ecological services, is far greater than the benefit of reduced carbon emissions produced by this solar farm.

- Forests absorb and store carbon dioxide, helping mitigate climate change.
- Forests contribute to local climate regulation by providing shade, reducing temperatures, and moderating weather patterns. Excessive heat is the leading cause of weather-related deaths in the United States.
- Trees filter pollutants from the air and help maintain water quality by reducing runoff and filtering water.
- Habitat loss is one of the main causes of biodiversity loss, as land that once was forest is cleared for other uses.
- Clean energy sources aren't enough to meet climate goals. Removing carbon from the atmosphere is just as important, and Connecticut's trees are a primary means to that end.

In addition, creating a solar farm by clear cutting 7.9 acres of forest, especially when it is a part of a much larger forested area, violates a number of the specific recommendations of the Governor's Council on Climate Change including the following:

Recommendations for Working and Natural Lands:

- **Evaluate approaches and best practices for siting of renewable and non-renewable energy infrastructure to avoid loss of forests, farmland and other sensitive lands.** As Connecticut deploys large-scale solar projects, it is important that this development does not supersede other climate change mitigation strategies, including the carbon sequestration and storage potential of natural and working lands. The state should encourage developers to site their projects on brownfields, rooftops, parking lots, and other developed spaces.

Recommendations for Forests

- **Explore option of statewide “no-net-loss of forest” policy. Consideration should be given to the following actions as part of the evaluation of this policy: avoid forest conversion; protect healthy, intact, and resilient forests;** offset all planned or permitted forest losses; provide incentives for stewardship, forest retention, and forest resiliency; and protect urban forests, build more parks, and plant more trees.
- **Increase adaptation and resilience of Connecticut’s forests through keeping forests as forests and support actions to maintain un-fragmented forests.**
- Consider actions to **increase statewide forest cover from 59% to over 60% by 2040.**
- **Support urban forestry** and community interest in tree planting and maintenance, parks, and/or community gardens in densely populated areas.
- **Protect forests with a changing climate** through state and federal land acquisition, stewardship and protection programs and research for adaptive management.

We are also concerned at the lack of detail in this petition regarding the carbon reductions claimed by the petitioner. The basis of the CO₂ calculation is not provided in this application, and we believe is an underestimation. For example, the petition states this clearcutting will cause a return of 6.6 MT of carbon dioxide to the atmosphere. However, based on statistics published by the USDA Forest Service for the State of Connecticut, the average CO₂ emissions from the removal of 7.9 acres of private forest would be more than 1,100 MT. (Average amount of CO₂ emissions avoided by preventing forest loss in Connecticut is 139.9 metric tons/ acre). If it is assumed that the stumps will be removed, below ground biomass also must be considered in the calculation.

Furthermore, the proposal does not detail how the land will be cleared other than to state it will be clearcut. The following questions need to be answered in order to establish an accurate calculation of the true carbon impact of this proposal:

1. Will the clearcut trees be chipped?
2. Will stumps be removed or cut to within 12” of the ground?
3. Will wood chips, tub-ground stumps, etc. be left on site or removed? If left on site, where will these be placed? If removed, how many truck loads?
4. Will a consulting forester be hired to identify the highest and best use of timber on the site? (The yield of usable hardwood sawlogs in a typical 8 acre stand in CT for conversion into furniture, flooring etc. is equivalent to approximately 53 tons of carbon dioxide permanently sequestered. This may not seem like much but represents the carbon dioxide needed to provide electricity produced by natural gas for about 12 homes.)

In summary, we believe that this proposal does not properly calculate its carbon impact, does not account for the additional ecological services provided by forested land, and violates the recommendations of the Governor's Council on Climate Change. While we strongly support increasing the amount of our energy produced by solar photovoltaic installations, such installations should not replace mature forests which sequester carbon and provide invaluable ecological services. We urge you to reject this application.

Respectfully submitted for the Commission

Thomas Parlapiano, Chair