



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

September 30, 2024

Raymond E. Drew
Director of Public Works
Tree Warden
City of Torrington
Municipal Building
140 Main Street
Torrington, CT 06790-5245
ray_drew@torringtonct.org

RE: **PETITION NO. 1638** – LSE Sextans LLC and LSE Sextans II 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 3.0-megawatt AC solar photovoltaic electric generating facility and associated equipment located at Parcel Nos. 221-3-1 and 222-4-26, Lovers Lane, Torrington, Connecticut, and associated electrical interconnection.

Dear Raymond Drew:

The Connecticut Siting Council (Council) is in receipt of the City of Torrington Public Works Department's correspondence dated September 30, 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.

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 and administratively noticed in the record.

Please note that you can view all of the documents related to this proceeding on our website at <https://portal.ct.gov/csc> under the "Decisions" link. You may also keep apprised of Council events on the website calendar and meeting agenda.

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

Sincerely,

Melanie A. Bachman
Executive Director

MAB/MP/dll

c: Service List, dated August 16, 2024
Council Members

City of Torrington



PUBLIC WORKS DEPARTMENT
Raymond E. Drew., Public Works Director
Email: ray_drew@torringtonct.org

140 Main Street • City Hall
Torrington, CT 06790-5245
(860) 489-2232 • Fax: (860) 489-2550

VIA ELECTRONIC MAIL

September 30, 2024

Ms. Melanie A. Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
siting.council@ct.gov

Re: PETITION NO. 1638 – LSE Sextans LLC and LSE Sextans II 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 3.0-megawatt solar photovoltaic facility in Torrington, Connecticut.

Ms. Bachman and Honorable Members of the Siting Council:

After a review of the Petition, I am compelled to express my opposition to this petition due to its proposal to clear almost 12 acres of forest on Lover's Lane in Torrington. There is no question that cutting that many trees forest will have a negative impact on biodiversity as well as air and water quality in this area.

The benefit of maintaining this forested land far exceeds the benefit of reduced carbon emissions produced by this solar farm as stated in the Petition. The reasoning behind this conclusion is obvious, and includes the following:

- The ability of trees to absorb and store carbon dioxide, removing it from the air and mitigating the effects of climate change.
- The effect trees and forests have on controlling 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.

- The ability of trees to filter pollutants from the air and to help maintain water quality by reducing runoff and filtering ground water which makes its way to the water table.
- The loss of habitat which negatively impacts biodiversity, 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 12 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.

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 there be a replanting of at least a one-to-one ratio?
3. Will stumps be removed or cut to within 12" of the ground?
4. 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?

5. 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. Let us not forget the messages from the "*The Lorax*", the 1971 beloved children's book by Dr. Seuss. I urge you to reject this application.

Sincerely,



Raymond E. Drew
Director of Public Works.
Torrington Tree Warden