



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

February 7, 2025

TO: Service List, dated January 8, 2025

FROM: Melanie Bachman, Executive Director *MAB*

RE: **PETITION NO. 1655** – Borrelli 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 1.99-megawatt AC solar photovoltaic electric generating facility and associated equipment to be located at 179 and 197 Borrelli Road, East Haven, Connecticut, and associated electrical interconnection.

Comments have been received from the Connecticut Department of Energy & Environmental Protection on February 7, 2025. A copy of the comments is attached for your review.

MAB/MP/dll

c: Council Members
CGS §16-50j(i) State Agency Comment List (via electronic mail)



February 7, 2025

Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: 1.99 MW Solar Photovoltaic Solar Project
Borrelli Solar LLC c/o Allco Renewable Energy Limited
157 Church St, 19th Floor
New Haven, CT 06510
Petition No. 1655

Dear Members of the Connecticut Siting Council:

Staff of the Department of Energy and Environmental Protection (DEEP) Office of Environmental Review & Strategic Initiatives (ERSI) reviewed the above-referenced petition by Borrelli Solar LLC (Petitioner) for a declaratory ruling that a Certificate of Environmental Compatibility and Public Need is not required for the construction, operation, and maintenance of its 1.99 MW solar photovoltaic facility (Project). The Project is located on two parcels at 179 and 197 Borrelli Road in East Haven. The Project Site area is approximately 12.9 acres.

Staff comments in this letter focus on areas within DEEP's jurisdiction. In addition to reviewing projects for the Siting Council, ERSI staff participate in the Sustainable Transparent and Efficient Practices for Solar Development (STEPS) process, which includes guidance on siting solar facilities that avoids, minimizes, and/or mitigates adverse impacts to the local community and on the environment, agricultural, and natural resources to the maximum extent practicable.

Summary of Key Findings

- ERSI conducted a site visit on January 22, 2025, and observed an overgrown vacant lot with remaining piles of gravel on the upper portion of the proposed Project Site.
- The proposed Project Site is a former gravel pit operation center. Ten (10) feet of soil was placed on site as a cap over the former gravel pit operation center debris.
- No wetlands are within the project footprint and the Petitioner states the Project will be at least 50 feet from any wetland.
- The ecological surveys required by NDDDB are currently under review by DEEP.
- Ballasts -- mounts for solar arrays made from concrete blocks or a similar foundation -- will be used to reduce soil compaction or loss during the installation process.
- The Project was selected through a procurement solicited by the Electric Distribution Companies under the Non-Residential Energy Solutions program (NRES).

- The Project Site plans on using animal grazing with sheep alongside the solar arrays. Prime farmland soils account for 0.5 acres of the 12.9-acre site.
- In section 3.4 of the petition, the Petitioner states that 3.75 acres of trees will need to be removed to accommodate the project. However, in section 7.2 the Petitioner states that 1.71 acres will need to be cleared of trees/ vegetation for the construction. DEEP recommends that the Connecticut Siting Council clarify the acreage for disturbance with the Petitioner.

Project Description

The proposed Project is a 1.99 MW (AC) solar photovoltaic project on a former gravel pit operation center. Properties abutting the site include single-family residences, agricultural fields, and vacant land. The site would be accessed by an existing drive from Borrelli Road, with a proposed gravel access road to be constructed along the westerly portion of the site. The racking system will use a ballasted foundation with concrete or similar footings that will rest on the surface of the grade and will be designed to support the load of the solar panels as well as other environmental loads. Ballasts, or a similar foundation, were chosen for this project to preserve the ten (10) feet of soil that was placed on top of the previous gravel pit. The point of interconnection will be at an overhead electric line along Borrelli Road.

Project Site Visit

ERSI staff visited the Project Site on January 22, 2025. The Project consists of a 1.99 MW solar array spanning two separate parcels on the property. The first array, with a size of 1.24 MW, is located on a vacant former gravel pit operation center. Staff observed a vacant gravel lot with overgrown vegetation surrounded by deciduous trees and a few evergreen bushes. The second array is located on a raised hill on the western area of the project site. Staff observed an area of the gravel operation with piles of gravel along with mixed shrubs and trees that are proposed for clearing in the petition. Approximately 1.48 acres are proposed for clearing in this section, which will be utilized for .75 MW of the total 1.99 MW. The Petitioner did not specify the footprint of the solar arrays in relation to the 12.9-acre Project Site. A pre-application meeting with DEEP was not held, and during the site visit it was discussed with the Petitioner representative and staff from ERSI that Stormwater Management be contacted for more information and

DEEP Areas of Focus

Stormwater Management

Construction-related land disturbances of one (1) acre or larger are regulated under CGS Section 22a-430 and under Section 402(p) of the federal Clean Water Act and the National Pollutant Discharge Elimination System (“NPDES”) program. Prior to the start of such regulated activities, authorization is required from local authorities or from DEEP for larger projects. Construction projects involving five (5) or more acres of land disturbance may also require an individual NPDES discharge permit from DEEP or may be eligible to register for coverage under DEEP’s NPDES General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (Stormwater General Permit). The Petitioner recognizes the need to register for DEEP’s General Permit for the Discharge of Stormwater and Dewatering Wastewater (Stormwater General Permit).

DEEP offers pre-application meetings for developers to have the opportunity to discuss the unique aspects of their site and determine the level of permitting required, water management design options, and

alternatives that may minimize land disturbance. ERSI recommends the Petitioner arrange a pre-application meeting to discuss the unique aspects of this project. The project will be utilizing ballasts or a similar foundation to preserve the soil cap that is in place. Due to the minimal changes in ground disturbance for the solar arrays, a pre-application meeting can help to determine the number and capacity of stormwater basins.

Core Forest

Connecticut General Statutes Chapter 277a Sec. 16-50k states that for a solar photovoltaic facility with a capacity of two or more megawatts, to be located on forestland, the DEEP must represent in writing, to the Siting Council that such project will not materially affect the status of such land as core forest.

Although the Project is under the two-megawatt threshold and no letter is required, no core forest is proposed to be impacted by the arrays.

Natural Diversity Data Base

In a determination letter dated July 21, 2023, NDDDB requested surveys of the Project Site, and the results of the completed surveys are currently under review and a final determination will be required before the Construction Stormwater GP can be issued.

There will be no proposed 6-inch gaps for wildlife movement in fencing due to the proposed animal-grazing co-use of the Project Site.

Wetlands and Vernal Pools

Wetlands were identified adjacent to the site outside the footprint of the array. No work is proposed within 50 feet of a wetland, and no vernal pools were identified during the wetland investigation.

Reducing Carbon Emissions and Ozone Forming Pollutants

DEEP notes that the construction of solar facilities would support Connecticut's vision for a more affordable, cleaner, and more reliable energy future for the ratepayers of Connecticut. Bringing more zero-carbon energy projects online furthers this vision by diversifying the regional fuel mix, and aids 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. Displacing emissions from fossil combustion also can reduce emissions of nitrogen oxides (NOx) that contribute to the formation of ozone or smog. Displacing NOx emissions especially on peak ozone days in the summer can help reduce the number of days Connecticut's air quality is designated as "unhealthy."

Visual

Vegetative plantings along the facility's boundary will remain throughout the life of the project and will aid in screening the facility from the abutting residences.

Noise

The inverters at a solar facility create noise which can be intrusive to homes located in close proximity. The nearest residence is located at 207 Borrelli Road, approximately 30 meters (~98 feet) from the nearest transformer or inverter. DEEP recommends a closer review of the location of the transformers and inverters to ensure potential noise impacts are mitigated.

Decommissioning Plan

As represented in the Petition, decommissioning will involve removal and disposal or recycling of all above-surface Project components. All recyclable materials will be transported to the appropriate nearby recycling facilities. Any non-recyclable materials will be properly disposed of at a nearby landfill. 95% or more of the Facilities' components will be recyclable.

Thank you for the opportunity to review this application and to submit these comments to the Connecticut Siting Council. DEEP's comments are based on information available for review as of the date of this letter, which may not fully apply if elements of this petition are modified through the Siting Council's administrative review process. Since this petition may be modified, these comments should not be considered to be a final endorsement or rejection for the public record.

Respectfully yours,



Laschone P. Garrison
Environmental Analyst 3

CC: Katie Dykes, DEEP Commissioner