



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

February 5, 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.

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Comments have been received from the Department of Public Health on February 5, 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)

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

Manisha Juthani, MD  
Commissioner



Ned Lamont  
Governor  
Susan Bysiewicz  
Lt. Governor

Drinking Water Section

VIA ELECTRONIC MAIL

February 5, 2025

Melanie Bachman, Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051  
[Melanie.Bachman@ct.gov](mailto:Melanie.Bachman@ct.gov)

**RE: Petition No. 1655 for Declaratory Ruling filed by Borrelli Solar, LLC**

Dear Director Bachman:

In response to the Siting Council's solicitation for written comments concerning Petition No. 1655, the Department of Public Health (Department) provides the following comments on the proposed project to construct, maintain, and operate 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 (Proposed Project).

The Department's comments only address the Proposed Project's potential effects on drinking water at the Proposed Project's location and should not be construed as a statement on whether or not East Point Energy should be required to obtain a Certificate of Environmental Compatibility and Public Need. See Connecticut General Statutes [§ 16-50k](#).

Preliminarily, the Department notes that the Proposed Project's location (Location) is mostly within the watershed of the Saltonstall Reservoir System, which is an active water supply source for the Regional Water Authority public water system. The northwest corner of the Location is outside the watershed of the Saltonstall Reservoir System.

**Any manipulation of this land within the Saltonstall Reservoir System could impact the quality and/or quantity of the Regional Water Authority public water system.** It is important, therefore, that the risks to the quality and quantity of the drinking water supply from the construction, maintenance, and operation of the Proposed Project be minimized.



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To protect this water supply source, the Department makes the following recommendations for the Siting Council's consideration:

- As the Location of the Proposed Project is mostly within the watershed of the Saltonstall Reservoir, the construction site should be protected from erosion and runoff due to high-intensity precipitation events. These measures should be enacted at all times and stages of the Proposed Project. The design, installation, maintenance and inspection of erosion and sedimentation control measures should be consistent with the [Connecticut Guidelines for Soil Erosion & Sediment Control](#) and incorporated into this Proposed Project to protect the drinking water source.<sup>1</sup>
- The Proposed Project includes the removal of trees from approximately 3.75 acres of the Location. Forested areas are the ideal land cover for the protection of the quality of a drinking water source. Accordingly, the removal of trees within the drinking water watershed may adversely impact the quality of the drinking water because of increased stormwater runoff, reduced natural filtration of contaminants, and the destabilization of soils. The Department recommends that East Point Energy develop and implement a comprehensive mitigation strategy to address these concerns. Such a strategy should include, where feasible, replanting efforts, and the ongoing maintenance of stormwater.
- Any runoff or leakage from the Proposed Project should be prevented from flowing towards existing wetland areas, particularly those in the northeastern portion of the Location. The Location of the Proposed Project should be graded and on-site stormwater infrastructure installed in a manner which directs flows towards the western side of the property and outside of the drinking water watershed. This is especially important because the Location of the Proposed Project is primarily in a drinking water watershed and the runoff may affect the quality of the drinking water.
- The Department supports the recommendation of the Council on Environmental Quality that Borrelli Solar develop and implement a Spill Prevention Plan and its suggested response and containment measures.
- In addition to providing the Regional Water Authority and the East Shore District Health Department with a point of contact for use during the construction of the Proposed Project, Borrelli Solar should provide each a copy of all site plans. During the construction of the Proposed Project, the Regional Water Authority should also be provided access to inspect at any time.
  - Following completion of the Proposed Project, it is necessary for the Regional Water Authority and the Department to have ongoing access to allow for monitoring and inspection of the Location to ensure protection of the public drinking water watershed.
  - Following the completion of construction, Borrelli Solar should immediately report any incidents, including but not limited to fire, vandalism, tampering, and storm damage, at the site to the Regional Water Authority.

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<sup>1</sup> Connecticut Guidelines for Soil Erosion & Sediment Control, publication date September 30, 2023, [https://portal.ct.gov/-/media/deep/water/water\\_quality\\_management/guidance/sescg\\_cleanfinal.pdf?rev=7a4cbf1406e841799148b1f8d4033f80&hash=679015A2EC8F068083F9F15B8A13AF90](https://portal.ct.gov/-/media/deep/water/water_quality_management/guidance/sescg_cleanfinal.pdf?rev=7a4cbf1406e841799148b1f8d4033f80&hash=679015A2EC8F068083F9F15B8A13AF90).

Ms. Bachman  
February 5, 2025

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Should you have any questions, please contact Eric McPhee of my staff at [eric.mcphee@ct.gov](mailto:eric.mcphee@ct.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Manisha Juthani". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Manisha Juthani, MD  
Commissioner