



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

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September 24, 2025

Michael T. Looney
Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106
Michael.Looney@ct.gov

Re: Environmental Impact Evaluation (EIE) for Building a Regional Composting Facility for Southeastern Connecticut in Preston

Dear Michael T. Looney,

The Council on Environmental Quality (Council) provides the following comments regarding the EIE for Building a Regional Composting Facility for Southeastern Connecticut in Preston.

The Department of Energy and Environmental Protection (DEEP) proposes to provide funds to the Southeastern Connecticut Regional Resource Recovery Authority (SCRRRA) to construct an aerobic food waste composting facility in Preston that would be able to accommodate 5,000 tons of food waste and 8,500 tons of woody waste annually. The proposed facility would be situated on approximately six (6) acres of land owned by the SCRRRA at 132 Military Highway (Route 12), near an existing trash to energy facility.

Noise

The EIE states that “during operation of the compost facility, there will be noise from equipment, such as from an industrial grinder and front-end loaders” and “the blended mixture will then be placed in a concrete ASP bay, complete with forced aeration...” While the EIE states that “operational noise is not expected to disturb residents and other sensitive noise receptors above current levels”, it is unclear if a noise analysis was completed for all of the proposed equipment that could confirm compliance with applicable noise regulations at the adjacent noise zones. It is also unclear where the residents and other sensitive noise receptors are located in relation to the proposed facility. It would be helpful to include information regarding the calculated noise level for all equipment likely to be operated, and the distance from the proposed equipment to the “residents and other sensitive noise receptors” at the adjacent noise zones. The EIE also states that “with the implementation of proper mitigation measures, the potential operational noise impacts will be less than significant”; however, it is unknown what the operational mitigation measures would be since they are not described or listed in section 4.14.

Rare, Threatened and Endangered Species

The EIE states that “the State Natural Diversity Data Base (NDDB) map for the Town of Preston shows the project area and its proximity to areas where state and federal listed species and significant natural communities may exist.” However, it is unclear if consultation with NDDB has occurred and what species might be present proximate to the proposed project site since the EIE states that “an NDDB request would be submitted as part of the permitting process and the proposed action would comply with requests from the NDDB program to the extent

practicable.” Consultation with the NDDB should be a first step in complying with the requirement of the RCSA Section 22a-1a-3(b)(5) to consider the “effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of any resident or migratory fish or wildlife species;” when performing a review in accord with the regulations that apply to the Connecticut Environmental Policy Act (CEPA).

The EIE notes that a report generated through the United States Fish and Wildlife Service’s (USFWS) Information for Planning and Consultation (IPaC) website identified three (3) species “potentially impacted that are listed as threatened, endangered, or candidate species in the area of the site of the proposed action”; they are Northern Long-eared Bat (Endangered), Tricolored Bat (Proposed Endangered), and Monarch Butterfly (Proposed Threatened). The EIE also states that “the proposed action will involve the removal of a significant number of trees within the approximately 6 acres of site disturbance for construction of the proposed composting facility.” Potential use of the USFWS Range-wide Northern Long-eared Bat determination key (Dkey) and consultation with DEEP’s Wildlife Division would be appropriate in assessing potential effects on tree nesting bat species that might be present at the proposed site. Pursuant to RCSA Section 22a-1a-8(f)(6)(E), mitigation measures should be developed to a level of detail commensurate with the magnitude of the potential environmental effects, which could include time of year restrictions for tree clearing during the bats’ breeding season.

The Council notes that the EIE includes several references to a qualitative assessment that certain potential impacts to environmental and community resources would be “less than significant”. The provision of quantitative data could assist the public and other individuals to assess the potential direct, indirect, and cumulative effects to environmental and community resources listed in the Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-3(b). The Council also notes that several maps within the EIE fail to depict the location of the proposed facility including, but not limited to, the land use map, the Regional Plan of Conservation and Development, the 2025-2030 Locational Guide Map, National Historic Districts map, the floodzone map, etc., which might make it difficult for members of the public and other individuals to independently assess that information.

Thank you for your consideration of the Council’s comments.

Sincerely,



Paul Aresta
Executive Director