



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

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 a Regional Composting Facility in Kent

Dear Michael Looney,

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

The Department of Energy and Environmental Protection (DEEP) proposes to provide funds to the Housatonic Resource Recovery Authority (HRRA) to construct a solar-powered regional in-vessel composting facility near the Kent Transfer Station to process approximately 182 tons of food scraps annually.

Noise

The EIE states that “during operation of the in-vessel composter, there will be noise from the composting equipment itself, as well as from support equipment and vehicles such as front-end loaders” and “from an industrial grinder.” 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 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 site of the proposed action is located within a Natural Diversity Area that is closely associated with the nearby Housatonic River” and “it is not clear what species and how many species, if any, are associated with the proposed site.” Further, the EIE states that “three (3) species of note are indicated as intersecting with the site of the proposed action, although the species themselves are not identified by name.” 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).

Keith Ainsworth
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Paul Aresta
Executive Director

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 Zoning Map, the Land Use Map, the Sustainable Growth Policy Map, Cultural Resources map, the National Wild and Scenic Rivers System map, the floodzone map, the NDDB 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,

A handwritten signature in black ink, appearing to read "Paul Aresta". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Aresta
Executive Director