



# 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](mailto:siting.council@ct.gov)

[www.ct.gov/csc](http://www.ct.gov/csc)

January 7, 2019

James McDonald, Fire Marshal  
Richard Bauer, Chief  
Town of Killingworth Fire Marshal's Office  
323 Route 81  
Killingworth, CT 06419

RE: **PETITION NO. 1354** – Chatfield Solar Fund, 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 1.98-megawatt AC solar photovoltaic electric generating facility on approximately 25 acres located generally south of Route 80 (North Branford Road) and east of Chestnut Hill Road in Killingworth, Connecticut, and associated electrical interconnection to Eversource Energy's Green Hill Substation located at 775 Green Hill Road, Madison, Connecticut.

Dear Mr. McDonald and Mr. Bauer:

The Connecticut Siting Council (Council) is in receipt of your correspondence dated January 2, 2019, concerning the above-referenced petition. Thank you for taking the time to provide the Council with your comments.

At a public meeting held on December 6, 2018, the Council voted to hold a public hearing on this matter. A public hearing will be scheduled in the Town of Killingworth, the date and time to be determined and approved by the Council, for the benefit of the public.

Pursuant to Regulations of Connecticut State Agencies §16-50j-40, a copy of the petition is to be submitted to the municipality where the facility is to be located for review. Before reaching a final decision on a petition, the Council carefully considers all of the facts contained in the evidentiary record that is developed by the Council, the petitioner, parties and intervenors in the proceeding and members of the public who speak at the public hearing or submit written statements to the Council.

Your comments shall become part of the official record in this proceeding in the form of a limited appearance defined under subsection (f) of Connecticut General Statutes §16-50n. Copies of your correspondence will be distributed to all participants in the proceeding.

Please note that you can view all of the documents related to this proceeding on our website at [www.ct.gov/csc](http://www.ct.gov/csc) under the "Pending Matters" link. You may also keep apprised of Council events on the website calendar and agenda.

Thank you for your interest and concern in this matter.

Sincerely,

Melanie A. Bachman  
Executive Director

MAB/RDM/laf

c: Parties and Intervenors  
Council Members







## TOWN OF KILLINGWORTH

FIRE MARSHAL'S OFFICE

323 Route 81

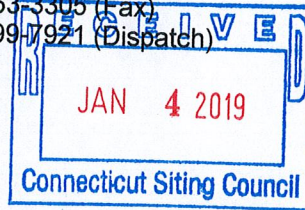
Killingworth, CT 06419

(860) 391-5603 (Cell)

(860) 663-1182 (Ofc)

(860) 663-3305 (Fax)

(860) 399-7921 (Dispatch)



Robert Stein, Chairman  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

January 2, 2019

RE: 1.98 MW Photo-voltaic generating facility  
Chatfield Solar Fund, LLC  
Killingworth, CT  
Petition No 1354

Dear Chairman Stein:

The Killingworth Fire Marshal and the Chief Officers of the Killingworth Volunteer Fire Company have reviewed the above reference petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need will be required for the construction of the proposed photo-voltaic generating facility south of Route 80, North Branford Road, Killingworth.

The petition does not address the need for fire protection at the site in the way of access roadways to facilitate fire apparatus within the site and well as surrounding the site, and more significantly a water supply source at the site. (CT Fire Code Chapter 18, Fire Department Access and Water Supply)

A commercial development of this size (16+ acres) would normally have multiple means of access to the property via driveways, circular roadways and turn around areas for fire apparatus to maneuver within the complex to properly position the apparatus to fight a fire within the complex. A fire access road around the perimeter of the fenced facility would provide a more effective means to defend the entire facility should it be threatened on the exterior by a wildland or brush/grass fire event. The plans have no such provisions.

The town of Killingworth has no municipal water supply within the town. The town has requirements for residential developers to provide permanent fire suppression water sources in the construction of subdivisions. This currently is being met by the placement of underground 30K gallon tanks based on the number of building lots and the distance of roadways within the development or alternatively with the placement of

FD approved Drafting Basins into existing lakes or ponds of sufficient year round volume to support firefighting efforts if needed. The plans have no such provisions.

The commercial development water supply requirements are established on an individual basis determined by the occupancy hazard for the commercial development. For example the construction of a middle school property in town required that the structure have a complete water based sprinkler system because of the educational occupancy requirement. The lack of a municipal water supply created a need for a complete fire pump system, stand pipes within the building and approximately 80k gallons of water on site.

While the petitioner's proposal does not include any buildings which might establish an exact requirement under the CT Fire Code, the total size (16+acres) of the installation and scope of the photo-voltaic generating facility (5700+ panels & multiple inverter locations) would be seen by this office as requiring an onsite water supply. A total Fire Company response to this location would bring 7k gallons of water and would be insufficient to control a large scale fire within the facility until more mutual aid resources would respond. However, the location of several in the ground water supply tanks would provide a much more robust initial fire attack in the event of a fire at the facility.

When considering the proposed facilities location, currently a wood lot to be clear cut while leaving a substantial surrounding vegetation area, it presents a concern of an exposure to a brush/grass fire or wildland fire event. The exterior perimeter fence should have a cleared area of a least 30ft of vegetation and an area of 30ft clearance to the remaining vegetation within the complex. (CT Fire Code Chapter 17, Wildland Urban Interface).

It would be very appropriate for the CT Department of Energy & Environmental Protection (DEEP) to conduct a Wildland Fire Hazard Assessment of the property and determine what might be needed to formulate a Wildland Fire Mitigation plan for the proposed power generating facility. Of specific concern is the topography of the site location which is a sloped hill side the presence of which can accelerate the rate of ground fire spread.

Lastly, the CT Fire Code does have the following provisions for Ground Mounted Photovoltaic System Installations (11.12.3).

Clearances, A clear area of 10 ft around a ground mounted photovoltaic system shall be provided (11.12.3.1).

Noncombustible Base, A gravel base or other noncombustible base acceptable to the AHJ shall be installed and maintained under and around the installation. (11.12.3.2).

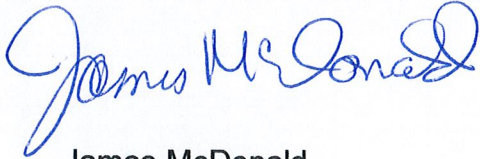
Security Barriers, Fencing, Skirting or other suitable security barriers shall be installed when required by the AHJ (11.12.3.3).

The issues identified by the Fire Marshal's Office and the KVFC have significant consequences to the Fire Company's ability to effectively provide fire protection to the proposed Photo-voltaic generating facility.



Thank you for the opportunity to review this petition and to submit these comments to the Council regarding the proposed 1.98 MW Photo-voltaic generation facility. Should you, other Council member or Council staff have any questions please feel free to contact us at the telephone number listed below.

Respectfully yours,



James McDonald  
Fire Marshal  
Killingworth, CT  
860-663-1182

Richard Bauer  
Chief, KVFC  
Killingworth, CT

Cc: Richard Bauer, Chief, KVFC