



OFFICE OF THE TOWN ATTORNEY
TOWN OF ENFIELD

Maria S. Elsdon, Town Attorney
Mark J. Cerrato, Assistant Town Attorney

January 16, 2019

State of Connecticut
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Nutmeg Petition No. 1352

Dear Members of the Connecticut Siting Council:

In lieu of cross examination and presentation of evidence on January 24th, the Enfield Town Council, a party in this matter, respectfully submits the following requests for Siting Council consideration in the above-referenced petition. Counsel for the Petitioner, Attorney David Bogan has consented to the filing of this letter (though not to its contents).

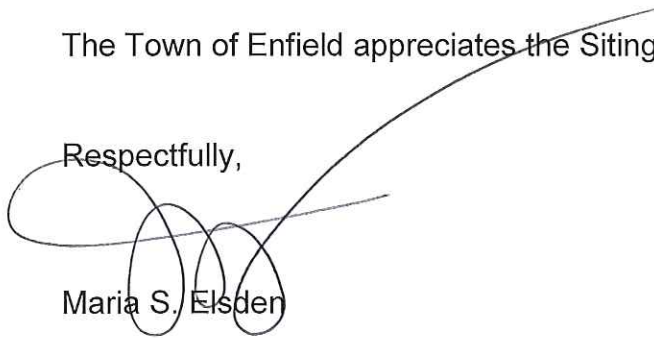
The undersigned attended both the evidentiary and public comment portion of the hearing held in the Enfield Council Chambers on January 10, 2019. Although the Town Council supports in concept Petition No. 1352, given that the proposed solar farm is not a permitted use in a residential zone, the Town Council requests that the Siting Council further consider factors to mitigate the proposed solar farm's effects on the residents in the area. The topics below were raised during the public hearing by either Siting Council members or by speakers during public comment.

1. **Buffer/Vegetation.** The Town appreciates that the petitioner has agreed to increase both the density of medium shrub plantings by decreasing spacing from 5' to 4' (creating a net increase of 60 shrubs) and the maturity of evergreen tree plantings from initial planting heights of 4-5' to 5-7'. However, the Town further requests that any Siting Council approval include:
 - a. a significant percentage of model pollinators among the petitioner's plantings;
 - b. plantings (*in addition to the proposed fence*) along Broad Brook Road which street is devoid of buffers and open to the road;
 - c. a plan to manage invasive species that may flourish in any disturbed area.

- d. a plan to maintain, in conformance with the Town's Property Maintenance Ordinance, that area between the proposed fence along Broad Brook Road and its street line.
2. **Well Water Protection.** Residents on both Bailey and Charnley Roads are on well water. To the extent that any pesticides or herbicides could be used in the management of grass, vegetation, or any other planting or eradication of grass, vegetation or any other growth, the Town Council requests that the Siting Council include a provision that the petitioner safeguard well water.
3. **Drainage.** Given the topography of the site and its proximity to residents, to town roads and to state roads, proper drainage is essential. The Town Council requests that the Siting Council include safeguards for proper drainage.
4. **Noise.** While a completed solar farm is not expected to create noise, the construction noise of the proposed solar farm installation may have a negative impact on the quality of life for residents near the site. This would not be an issue had the solar farm been sited within, or adjacent to, an industrial zone. Accordingly, the Enfield Town Council requests that the Siting Council consider the following:
 - a. Rather than the extensive construction hours proposed by the petitioner, the Town Council requests that construction work be limited to work days and normal business hours (i.e., Monday through Friday, 9 a.m. to 5 p.m.) and exclude weekends entirely.
 - b. Rather than using driven piles to create the foundation for the installation of the solar panels, the Town Council requests the use of auger piles which will result in a substantially lower decibel level.

The Town of Enfield appreciates the Siting Council's consideration of the foregoing.

Respectfully,



Maria S. Elsdner

c: Mayor Michael Ludwick
Enfield Town Councilors
Attorney David Bogan
Town Manager Christopher W. Bromson

K: Nutmeg Solar, Letter to Siting Council, 1-16-19