



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

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VIA ELECTRONIC MAIL

May 28, 2025

Melanie Bachman, Executive Director
Connecticut Siting Council
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PETITION NO. 1665 – TRITEC Energy Development, LLC (TRITEC Americas, LLC) (Petitioner) petition for a declaratory ruling for the proposed construction, maintenance and operation of a 1-megawatt solar photovoltaic electric generating facility and associated equipment to be located at 74 Bokum Road, Old Saybrook, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) supports the development of clean energy facilities on appropriate sites in Connecticut. The Council notes that the number of state-listed species that have the potential to be found on this site suggests that the proposed site would have higher ecological value than other sites, and deserves increased consideration by the Siting Council. The Council believes it's better to site solar projects on previously developed sites as opposed to those that have ecological significance. The Council offers the following comments regarding Petition 1665.

Wildlife

The Petitioner notes that the Connecticut Department of Energy and Environmental Protection's (DEEP) Natural Diversity Database (NDDDB) preliminary assessment, dated August 9, 2024, indicated that the proposed project could potentially impact seventeen (17) state-listed plant species and six (6) state-listed animal species. The NDDDB requested that "botanical field surveys of the site should be performed by a qualified botanist or plant ecologist at a time when these target species are identifiable," which the Petitioner has indicated would be completed in the summer of 2025. The NDDDB also requested that the Petitioner do field surveys and assess the habitat for state-listed reptiles that could be present on the proposed site, and develop a "conservation plan designed to prevent adverse effects on the state-listed reptiles" for the proposed site. Lastly, the NDDDB identified recommended protection measures for state- and federally-listed bats that have been documented in or near the proposed project area. Given the need to conduct additional studies to determine the presence, location and extent of the state-listed species, the Council questions if the potential impacts to state- and federally listed species can be determined at this time.

Vernal Pool

The Petitioner notes that four (4) wetland areas are present on the property and one (1) area has been identified as a potential vernal pool. While the Petitioner indicates that "all proposed solar panels will remain outside of the 100' wetland upland review area", there would be site clearing,

grading, and construction activities within the critical terrestrial habitat, which is the area located between the 100 feet and 750 feet from a vernal pool. The Petitioner also states that as currently designed, the project will “maintain approximately 72.7% forested cover within the Critical Terrestrial Habitat.” Because development pressures (buildings, impermeable surfaces, roads, lawns) higher than 25- 30% can cause declines in breeding populations of vernal pool species, the Council recommends that the Petitioner minimize impacts to the critical terrestrial habitat, to the greatest extent possible, and incorporate best development practices for “site clearing, grading, and construction activities” referenced in the *Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States.*¹

The Council’s comments above address only certain elements of the materials provided by the Petitioner at the time of the filing. Additional information can become evident through comments offered by other parties and during the Siting Council’s administrative hearing process. The absence of comment(s) by this Council about any Petition or Application, or any aspects thereof, may not be interpreted as an endorsement of a proposed project, or its components or that this Council might not have comments or concerns on more specific issues raised during the hearing process.

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

Sincerely,



Paul Aresta
Executive Director

¹ Calhoun, A. J. K. and M. W. Klemens. 2002. Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States. MCA Technical Paper No. 5, Metropolitan Conservation Alliance, Wildlife Conservation Society; <https://www.nae.usace.army.mil/Portals/74/docs/regulatory/VernalPools/BestDevelopmentPractices20Oct2014.pdf>