



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

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Executive Director

April 26, 2020

Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

RE: **PETITION NO. 1397** - Constitution Solar, LLC petition for a declaratory ruling for the proposed construction, maintenance and operation of a 20-megawatt AC solar photovoltaic electric generating facility on approximately 149 acres comprised of four separate parcels located off of Cornell Road in Plainfield, Connecticut.

Dear Ms. Bachman:

The Council on Environmental Quality ("the Council") supports the development of clean, renewable energy technologies on appropriate sites in Connecticut and offers the following comments with regard to Petition No. 1397 (Petition).

In the case of Petition No. 1397, the Council wishes to reiterate the position it has taken in recent, prior petitions that the best practices for construction of solar fields is now explicit in Appendix I of the Department of Energy and Environmental Protection (DEEP) Draft "General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities". Adoption of these practices by the developer, even when not required by permit, is in interest of the developer and the environment. Poor design and construction practices in the past have resulted in avoidable environmental damage and unnecessary expense for developers, when projects were subject to cease and desist orders. Consequently, the Council recommends that the guidelines in Appendix I be applied, where appropriate, at the proposed site.

Thank you for your consideration of these comments. Please do not hesitate to contact the Council if you have any questions.

Sincerely,

Peter Hearn