



Housatonic Valley Association

150 Kent Road
P.O. Box 28
Cornwall Bridge, CT 06754
860-672-6678

www.hvatoday.org

Merwin House
14 Main Street
P.O. Box 496
Stockbridge, MA 01262
413-298-7024

37 Furnace Bank Road
P.O. Box 315
Wassaic, NY 12592
845-442-1039



Litchfield Hills Greenprint
Collaborative

1/16/2019

Mr. Oswald Inglese, Jr., Director
Water Permitting and Enforcement Division
Bureau of Materials Management and Compliance Assurance
Connecticut Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106-5127

*Re: Comments on Candlewood Solar LLC Stormwater Pollution Control Plan
Application # 201816062 prepared by Wood Environment & Infrastructure Solutions, Inc. date
12/19/18 and recorded as received 1/2/2019*

Dear Director Inglese;

The Housatonic Valley Association, Inc. (HVA) appreciates the opportunity to submit comments regarding the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities sought by Candlewood Solar LLC in New Milford. We previously submitted written and oral testimony before the Connecticut Siting Council (Petition 1312) expressing our strong concerns about the impact of this project on core forest and rare species habitat, including vernal pools and other wetlands recognized and identified on the property during Siting Council review.

These concerns have not been adequately or accurately addressed by the applicant in their General Permit application. The negative impact on water quality, both during clearing and construction and subsequent to the installation of this massive industrial energy project on what is now a mostly wooded, steeply sloping mountain in close proximity to the Housatonic River, is unacceptably high. For these and other reasons we strongly urge that this project be reviewed as a Special/Individual permit instead of a General Permit.

The berms and drains detailed in the project plans submitted by the applicant will further compound negative impacts on adjacent perennial and intermittent wetlands, both on their natural resource values as vernal pools and rare species habitat and on surface water quality. The slimy salamanders and other amphibians that are obligate breeding species in these wetlands spend most of their lifecycles in the leaf litter or just beneath the soil of the forested uplands that will be impacted or destroyed by this project. Diversion and alteration of surface water hydrology will negatively impact the ecology of this system, while the steep slopes draining from the site into Rocky River will accelerate the transfer of sediments and pollutants directly downstream into the Housatonic River. The shallow depth to bedrock on this site further inhibits the gradual infiltration of groundwater from the sort of catch basins or rain gardens that might be possible at a more suitable location for such a facility.

We also wish to highlight and interpret what appears on the map created and submitted by HVA in its testimony before the Siting Council (Figure 5 on page 45 in its Findings of Fact). This map

was included by the applicant on page 293 of its General Permit application. This map shows the impact of the proposed solar installation of Core Forest Habitat, both within the clearcut project area and those forest areas that would convert from core forest to edge habitat within a 300' area shown on the map in yellow. The use of the label 300' Buffer on our map should not be construed as an environmental buffer mitigating the negative impacts of this project on the core forest resource. We used the term in its mathematical sense to show how we buffered outward by a set distance (300') from the edge of the area that will be cleared for the solar installation to determine areas of additional core forest loss and conversion from core to edge habitat. The map clearly shows its HVA provenance, including our logo.

We believe that the negative impacts of this project on water quality necessitate a Special/Individual Permit requirement and urge you not to approve the General Permit. We also respectfully request that the current public comment period be extended for a full 90 days, rather than the 15 days provided at present, so that you may benefit from the careful review and knowledge of the many public stakeholders who are impacted by this proposal.

Sincerely,



Tim Abbott
Regional Land Conservation &
Greenprint Director
Housatonic Valley Association

CC: Lynn Werner, Exec Dir.
HVA