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February 25, 2024

Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051  
via email: [siting.council@ct.gov](mailto:siting.council@ct.gov)

**Subject:** Petition No. 1609 - TRITEC Americas, LLC notice of election to waive exclusion from Connecticut Siting Council jurisdiction, and petition for a declaratory ruling for the proposed construction, maintenance and operation of a solar photovoltaic electric generating facility

To Whom It May Concern:

Thank you for the opportunity to provide comment regarding Petition No. 1609. The Connecticut Forest & Park Association (CFPA) is the state's first nonprofit conservation organization and the maintainer of the Blue Blazed Hiking Trails. For over 129 years, we have collaborated with the State of Connecticut, municipalities, community organizations and a powerful network of volunteers to conserve Connecticut for today and tomorrow.

CFPA was an active participant in the 2020 and 2021 convening of the Governor's Council on Climate Change (GC3). As such, we recognize the climate crisis we are living through, and the importance of transitioning the state's energy portfolio to include more renewables. At the same time, we are acutely aware of the potential impact of development, in general, on our forests and recreational resources. We advocate for protecting the state's core forests (the proposed site is located in one such area of forest) and the experience of hiking on Blue Blazed Hiking Trails (the Shenipsit is one such trail), and carefully weighing the benefits and costs of renewable energy development on other parcels of land.

The proposed photovoltaic electric generating facility located at 250 Carter Street, Manchester, Connecticut, and associated electrical interconnection would be in proximity to a section of the 50 mile Shenipsit Trail. The Trail provides an important wildlife habitat, is a valuable recreational resource for residents of abutting communities, and is frequently used by Connecticut's hiking community. In 2001 the entire Blue Blazed Hiking Trail System was designated an official state "greenway" by the Governor and the Connecticut Greenways Council. As a result of the Greenway designation, the Trail System has been included in the State Plan of Conservation and Development.



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The Shenipsit Trail is a volunteer-maintained Blue Blazed Hiking Trail. A section of the trail runs approximately 100-200 feet from the proposed project area. CFPA staff walked the trail on February 14 and determined that portions of the proposed project would likely be within view of the Shenipsit, especially during times of year when the forest is not in full leaf.

It is important to note that this particular section of the Shenipsit Trail is not permanently protected, and access for passive recreation could be lost, depending on nearby land uses and the wishes of private property owners. If the renewable energy project is approved, CFPA respectfully requests that the applicant and the Siting Council consider actions that could be taken to permanently protect the Shenipsit Trail

CFPA also notes the importance of addressing DEEP's review of the proposed project, in particular those relating to State-listed species, notably the Box turtle (*Terrapene Carolina carolina*) - State Special Concern, and disruption of its habitat during the construction process.

The surrounding mixed-deciduous second-growth forest is characteristic of this region of Connecticut. The project falls within one of the largest small core forest blocks in the area. CFPA's policy is to protect core forest from development.

CFPA has received calls and emails from local community members who have raised questions and concerns related to a variety of potential forest impacts, including loss of outdoor recreation and hiking opportunities, changes to water drainage, visual impact, loss of stored carbon, noise impacts, and loss of habitat. We hope that if this project moves forward, necessary steps are taken to minimize any negative impact to the Shenipsit Trail, including trail continuity, hiker safety and public use.

Thank you for your consideration of these comments.

Sincerely,

Andy Bicking  
Executive Director  
Connecticut Forest & Park Association