



The Jonah Center for Earth and Art

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Comments on the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities

To: Christopher Stone, P.E., Water Permitting and Enforcement Division, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection.

Over the past ten years, as demand for ground mounted solar arrays has risen, I have become aware of negative effects on the environment resulting from these projects. Excess stormwater runoff is perhaps the most serious of these effects, especially when land is cleared of brush or trees, disturbed by grading, or when the array is located on a hillside. The hard surfaces of the arrays and the mounting pads, the compaction of ground resulting from construction activities, and gravel access pathways lead to erosion and brings muddy runoff into nearby streams and rivers, damaging the environment for aquatic organisms and destroying vegetation that lies between the array and a watercourse. Ground-mounted solar arrays should not be considered as “pervious surfaces.” Further, trees which absorb carbon should never be cut down to make space for solar panels.

I wish to voice support for the more technical comments submitted by other organizations, such as Rivers Alliance, Connecticut Fund for the Environment/Save the Sound, and The Nature Conservancy, expressing the need for an updated construction manual for such projects and for revisions to the General Permit that recognize the need for tighter oversight of permitting and installation of ground-mounted solar arrays.

Thank you for your consideration of this matter.

A handwritten signature in black ink that reads "John C. Hall". The signature is written in a cursive, flowing style.

John C. Hall, Executive Director

Our mission: to foster sustainable relationships among people, other creatures, energy resources, and the environment and to promote interdisciplinary community partnerships in scientific, artistic, and other cultural endeavors.