

December 10, 2025

Melanie A. Bachman, Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re:

**Petition No. 1694 – Greenskies Clean Energy LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 4.0-megawatt AC solar photovoltaic electric generating facility and associated equipment accessed from Old Maids Lane in Glastonbury and located on a parcel south of the Glastonbury town boundary (Parcel No. 119/0014) in Portland, Connecticut and associated electrical interconnection.**

Dear Ms. Bachman:

Enclosed herewith are the comments of the Town of Glastonbury (the “Town”) in the above-captioned proceeding. Please also enter the appearance of the undersigned counsel to the Town in this proceeding.

Respectfully submitted,



Alan P. Curto

APC:cs  
Enclosure  
CC/ Service List

December 10, 2025

Melanie A. Bachman, Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re:

**Petition No. 1694 – Greenskies Clean Energy LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 4.0-megawatt AC solar photovoltaic electric generating facility and associated equipment accessed from Old Maids Lane in Glastonbury and located on a parcel south of the Glastonbury town boundary (Parcel No. 119/0014) in Portland, Connecticut and associated electrical interconnection.**

Dear Ms. Bachman and Members of the Connecticut Siting Council (the “Council”):

Per the Council’s correspondence of November 25, 2025, in response to the Town of Glastonbury’s (the “Town”) Motion for Party or Intervenor Status and Additional Requests dated November 24, 2025 (the “Motion”), the undersigned hereby submits the Town’s initial comments in the above-captioned proceeding (the “Petition”).<sup>1</sup> The Town generally concurs with the written comments submitted by Town resident Atty. Charles Walsh on November 26, 2025 (the “Walsh Comments”), as part of Atty. Walsh’s Motion for Party/Intervenor Status and Comments on the Application. In addition, the Town hereinbelow elaborates on certain of the Walsh Comments.

The Town’s primary concerns regarding the proposed solar voltaic facility (the “Facility”) that is the subject of the Petition are its potential impacts to the abutting Nayaug Elementary School, a K-5 elementary school for over 500 children (the “School”); and to Town residents in the nearby Old Maids Lane/Main Street neighborhood.

---

<sup>1</sup> The Motion remains pending before the Council and will be considered at its meeting on December 11, 2025.

### **Construction of the Subject Facility: Noise and Additional Concerns**

The Town concurs with Walsh Comments 4 through 29 concerning construction noise; and in particular Comment 25, requesting that “all construction occur during the summer recess so as not to disturb students at the abutting [School].” The Town joins in this request.

The Town notes in this regard that Section 3.3 of the Petition states on pg. 7 thereof:

“Formal construction notice to proceed would be anticipated in Spring/Summer 2026, with final delivery of equipment commencing soon after....Final installation of array equipment and landscaping/screening measures would be anticipated in Fall of 2026. Final site stabilization, testing and commission would be expected to be completed before the end of 2026.”

While acknowledging that a degree of uncertainty is inherent in any construction schedule, the above language could be interpreted to mean that the bulk (or the entirety) of Facility construction could occur during the Fall of 2026, when the School would be back in session. By way of information, the first day of the 2025/2026 school calendar is August 31<sup>st</sup>, 2026 (Teacher Convocation Day); with students arriving on September 2<sup>nd</sup>, 2026. Thereafter, the school day starts with drop-offs beginning at 8:20 a.m., with class beginning at 8:51 a.m. Classes end at 3:30 p.m., with student pick-ups and departures from that time until 4:00 p.m. In addition, on Wednesdays during the months of September through November, and March through June, the school day ends at 1:25 p.m. for students with dismissal at that time, with teachers remaining for professional development until 4:00 p.m.

Construction of the Facility during periods when the School is in session would raise several concerns. The Petition; and in particular the Construction Notes on Appendix A, Sheet 102, lack detail as to construction parameters such as the number and type of vehicles and equipment to be utilized, the number of vehicle trips per day over Old Maids Lane, and the location of construction laydown area(s) and vehicle storage areas. Without such information, it is difficult to assess; and thus to condition, construction activities in a manner that would minimize construction impacts on the School.

For these reasons, the Town requests that construction activities be limited to the period from mid-June 2025 (the exact date depending the number of snow/emergency days during the current school year) to August 31<sup>st</sup>, 2025. If this is not possible, then the Town requests that the Council require more detailed information from the petitioner Greenskies Clean Energy LLC (the “Petitioner”) regarding construction activities, and that these activities be conditioned and/or restricted so that the Town’s safety and noise concerns are addressed. It is also essential that construction activities (and operational activities once construction is completed) take into account the above student drop-off and pick-up times at the School, during which traffic volumes are greatly increased. See Walsh Comments 115 to 188. The Town therefore requests that the Petitioner be directed to coordinate construction, as well as ongoing operation, and maintenance

and repair activities, with the School, so that such activities are prohibited, or restricted to the maximum possible extent, during student drop-off and pick-up times.

### **Nighttime Operations**

While noting that the School will not be in session during nighttime hours, the Town concurs with Walsh Comments 27 through 55 with respect to Town residents residing in the Old Maids Lane/Main Street neighborhood. In particular, the Town requests that the Council require the Applicant to supplement its Noise Study (Appendix L to the Petition) with calculations concerning the actual equipment to be used in the Facility. In addition, the Town requests that the Council direct Greenskies to plant, maintain and replace as needed, a dense evergreen border to the East (to the extent practical without shading the Facility) and to the North of the Facility. The Town notes that such plantings will also assist in reducing or eliminating the visual impacts of the Facility described below.

### **Visual Impacts**

The Town concurs with Walsh Comments 56 through 76. More particularly, the Town points out that the Visual Impact Assessment (Appendix J to the Petition) at pg. 2, assumes an eye-level viewer height of 6 feet. Given that the second floor windows of the School are at an approximate height of 20 feet, this assumption is inadequate to estimate the potential visible impacts of the Facility to the School. In addition, the Visual Impact Assessment does not appear to take into account the potential for glint or glare from the Facility's solar panels as they track and reflect the Sun, regardless of whether the solar panels are themselves visible at all times.

For the above reasons, the Petitioner should be directed to augment the Visual Impact Assessment in order to analyze the Facility's potential visual impacts at the School's elevation and location. In addition and as noted above, the Town requests that the Council direct the Petitioner to plant, maintain and replace as needed, a dense evergreen border to the East (to the extent practical without shading the Facility) and to the North of the Facility.

### **Decommissioning Plan**

The Town concurs with Walsh Comments 100 through 114. With respect to Walsh Comment 113 concerning the posting of a bond for decommissioning the Facility, the Town asserts that an enforceable bond or escrow fund, indexed for inflation and sufficient to ensure that soil, hydraulic and ecological integrity are restored at the farmland site and in the immediate vicinity, is essential and should be required.



## Conclusion

While the Town is generally supportive of renewable energy facilities such as the Facility, for all of the above reasons the Town urges the Council to mitigate, to the furthest extent possible, the potential detrimental impacts of the Facility to the School and to the surrounding Glastonbury neighborhoods during construction, operation and decommissioning.

Respectfully submitted,



Alan P. Curto

APC:cs

CC/Service List