STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
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VIA ELECTRONIC MAIL

December 29, 2025

TO: Service List, dated November 26, 2025

FROM: Melanie Bachman, Executive Director MAB

RE: **PETITION NO. 1697** – CEFIA Holdings, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.7-megawatt AC solar photovoltaic electric generating facility and associated equipment located at the Connecticut Department of Transportation Headquarters, 2710-2880 Berlin Turnpike, Newington, Connecticut, and associated electrical interconnection.

Comments have been received from the Connecticut Department of Energy & Environmental Protection on December 29, 2025. A copy of the comments is attached for your review.

MAB/IN/dll

c: Council Members
CGS §16-50j(i) State Agency Comment List (via electronic mail)

From:	Hammerling, Eric
To:	Bachman, Melanie
Cc:	LaFountain, Dakota; Garrison, Laschone P
Subject:	DEEP Comment Letter on Petition 1697 in Newington
Date:	Monday, December 29, 2025 9:50:43 AM
Attachments:	DEEP Review Petition 1697 Solar Newington December 25.pdf image001.png image002.png image003.png image004.png image005.png image006.png

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Hi Melanie,

On behalf of my colleague Laschone Garrison (who is on vacation this week), I'm submitting the attached DEEP comment letter on Petition 1697 which was due on 12/26.

I hope you are all having happy holidays at the CSC!

All the best,

Eric

Eric Hammerling
Office Director, Environmental Review & Strategic Initiatives (ERSI)
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Connecticut
Department of Energy &
Environmental Protection

Conserving, improving, and protecting our natural resources and environment;
Ensuring a clean, affordable, reliable, and sustainable energy supply.

portal.ct.gov/DEEP

Connecticut
Department of Energy &
Environmental Protection

December 26, 2025

Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: 1.7 MW Canopy Mounted Solar Photovoltaic Project
CEFIA Holdings, LLC/VEROGY
2710-2880 Berlin Turnpike
Newington, CT 06111
Petition No. 1697

Dear Members of the Connecticut Siting Council:

Staff of the Department of Energy and Environmental Protection (DEEP) Office of Environmental Review & Strategic Initiatives (ERSI) reviewed the above-referenced petition by CEFIA Holdings, LLC (Petitioner) for a declaratory ruling that a Certificate of Environmental Compatibility and Public Need is not required for the construction, operation, and maintenance of its 1.7 MW canopy mounted solar photovoltaic facility (Project). The Project is located within a proposed footprint of ~2.69 acres on a total project site of ~54.95 acres.

Staff provide comments on areas within DEEP's jurisdiction as they relate to the proposed project. Staff may conduct site visits as part of the analysis to observe site characteristics that may not be captured in the project plans. DEEP may also include observations or discuss potential noise and visual impacts that can be avoided or mitigated through project planning.

In addition to reviewing projects that come before the Siting Council, ERSI staff participate in the Sustainable Transparent and Efficient Practices for Solar Development (STEPS) process, which includes guidance on siting solar facilities that avoids, minimizes, and/or mitigates adverse impacts to the local community and on the environment, agricultural, and natural resources to the maximum extent practicable.

Summary of Key Findings

- A site visit was conducted on December 4, 2025. The Project site is located at The Connecticut Department of Transportation's administration building within Newington's planned development district. The proposed canopy mounted solar facility would occupy approximately 2.69 acres of developed land within the ~54.95-acre property.
- Two wetlands are located within the property.
- The proposed Project does not impact core forest.
- Approximately ~20 acres of the Project site includes mapped prime farmland soils.
- The Eastern Box Turtle is a state-listed species of special concern that is noted in the NDDB determination letter as potentially being present at or near the site.

- A pre-application meeting between DEEP and the Petitioner was held on May 9, 2024.The Project has an incentive with Eversource under the LREC/ZREC Program.

- Visual impacts were noted during the site visit.

Project Description

The proposed Project is a 1.7 MW canopy mounted solar facility located on two separate parking lots approximately 2.69 acres of the 54.95-acre property. The site is currently owned and operated by State of Connecticut and serves as their DOT Administrative Buildings. The Project site is already developed and is currently being used for DOT employee parking, DOT maintenance, a commuter lot, and houses a State Fuel Station. The proposed primary access point to the Project site will be via an existing driveway and parking lots for the Project site. No additional construction is proposed for access to the Project site. Each lot will have its own interconnection point and both points are proposed to interconnect directly to the main building's electrical room.

Project Site Visit

ERSI staff visited the Project site on November 3, 2025. The Project site is DOT's administrative building facility complex. The site is bordered on the north by businesses, to the east and south by residential properties, and to the west by the Berlin Turnpike. Because this project is proposed on a site that is already developed, there is anticipated to be very little land disturbance and minimal environmental impact.

The proposed solar facility will be located in two parking lots situated on the Project Site. The main parking lot, positioned directly behind the main building, consists of a large open parking lot with rows of parking spaces intertwined with grassy islands in between some of the parking spaces. At the end of these grassy islands there are a few sporadic decorative trees. According to the Petitioner representative, with the development of the solar facility, a few decorative trees may be removed. The lower parking lot is located south of the main parking lot. This lot contains rows of parking spaces with no vegetation, a DOT maintenance garage, and a State Fueling Station. A commuter lot extends from the southern portion of this lot, but it is not proposed to be impacted by the development of the facility. As discussed during the site visit, it is anticipated that fill material will not be used during the development of the facility and vacant holes created with the removal of existing light poles will be reused in the structural design of the facility. Potential visual impacts were noted during the site visit due to the close proximity of houses located on Wavery Drive.

DEEP Areas of Focus

Stormwater Management

Construction-related land disturbances of greater than one (1) acre are regulated under CGS Section 22a-430 and under Section 402(p) of the federal Clean Water Act and the National Pollutant Discharge Elimination System ("NPDES") program. Solar projects involving five (5) or more acres of land disturbance typically register for coverage under DEEP's NPDES General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (Stormwater General Permit)

As discussed during the May 9, 2024, pre-application meeting, the amount of disturbance proposed for construction of the proposed solar facility is estimated to be less than an acre and stormwater construction general permit registration is not anticipated to be required to be submitted for this Project.

Core Forest

Connecticut General Statutes (CGS) Sec. 16-50k states that for a solar photovoltaic facility with a capacity of two or more megawatts, to be located on forestland, the DEEP must represent in writing, to the Siting Council that such project will not materially affect the status of such land as core forest.

The Project is under the two-megawatt threshold and no letter from DEEP is required. According to DEEP's Habitat Forestland Habitat Impact Map, the Project is not proposed to impact core forest.

Prime Farmland

In accordance with the Code of Federal Regulations ("CFR") Title 7, part 657, Prime Farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber forage and oilseed crops.

Approximately ~20 acres of the Project site falls within mapped prime farmland soils (**Depicted as brown grid on map**). However, this determination predates the development of this site with the parking lot(s) that the facility will be built upon and the building to which the facility will interconnect.

Map Source: Petitioner Narrative Map

Natural Diversity Data Base

Natural Diversity Data Base (NDDB) maps show approximate locations of endangered, threatened, and special concern species as well as important natural communities in Connecticut. These maps are intended to be a tool to show potential impacts to state-listed species. The locations shown on the maps are based on information collected over the years by DEEP staff, scientists, and others.

As discussed in the Petition, there is no proposed impact to the existing undeveloped land, but the proposed Project is located in a Natural Diversity Data Base area. A May 15, 2024, DEEP Wildlife Division determination letter identified the Eastern Box Turtle, a state-listed species of special concern, as potentially present at or near the host parcel(s). Although not discussed in the Petition Narrative, the Petitioner should implement best management practices for the Eastern Box turtle as addressed in the DEEP Wildlife Division's determination.

Wetlands and Vernal Pools

There are two wetland systems located in undeveloped areas of the property. All canopy mounted solar panels and associated equipment are proposed to be located within the existing parking lot(s) and outside of the 100' buffer from both wetland areas. There are no vernal pools delineated in the field at the Project site.

Reducing Carbon Emissions and Ozone Forming Pollutants

DEEP notes that the construction of solar facilities would support Connecticut's vision for a more affordable, cleaner, and more reliable energy future for the ratepayers of Connecticut. Bringing more zero-carbon energy projects online furthers this vision by diversifying the regional fuel mix, and aids in achieving a 100% zero-carbon electric sector by 2040 as required by Connecticut General Statutes Sec. 22a-200a(a)(3). Developing grid-scale renewables is also imperative to the state's success in achieving its statutory goal of reducing carbon emissions by 45% below 2001 levels by 2030 and by 80% below 2001 levels by 2050. Displacing emissions from fossil combustion also can reduce emissions of nitrogen oxides (NOx) that contribute to the formation of ozone or smog. Displacing NOx emissions especially on peak ozone days in the summer can help reduce the number of days Connecticut's air quality is designated as "unhealthy."

Visual

It is anticipated that the residents on Waverly Drive will have a partial view of the proposed solar facility through their property tree line. During the site visit, it was noted that the surrounding properties, on Waverly Drive, have a thin deciduous tree line and this visual impact was more prevalent due to the seasonal leaf abscission. It is anticipated that the visual impact will be less prevalent during seasonal leaf sprouting due to the camouflage provided by the foliage. DEEP also notes that with the proposed development of the solar facility, including the canopy mounted panels, the surrounding properties' views will not be substantially different than the current parking lot views that exist presently.

Noise

The inverters at a solar facility can create noise which can be intrusive to homes located in close proximity. The inverters on canopy mounted systems only operate during the day and are proposed to be located in various areas on the structural support columns of the system. DEEP staff believe that noise impacts will

not be a factor for the Project. During the site visit, a significant level of vehicular noise was audible stemming from the adjacent Berlin Turnpike. According to the Town of Newington's noise ordinance, levels in a planned development district with a residential zone receptor cannot exceed 45 dBA during the night and 55 dBA during the day. An acoustic study was not conducted but as stated in the Petition narrative, a single inverter is anticipated to generate a maximum sound level of 60 dBA at 1 meter (3.3 feet) away. The residences at 100 and 90 Waverly Drive are the closest properties to a proposed noise-generating inverter. Both residences are approximately ~77 feet to the south of the proposed solar facility. As discussed during the site visit, the Petitioner applied the Inverse Square Law to evaluate the relative sound level of an inverter to the nearest residential property line. The calculations express that a 60 dBA at one meter would decline to approximately 38.6 dBA at a distance of 77 feet (23.5 meters), which is below the noise ordinance of 55 dBA during the day.

Decommissioning

As represented in the petition, when the canopy mounted solar panel facility reaches the end of its lifespan, the facility will be decommissioned. The decommissioning process includes the system being de-energized from the utility power grid. The infrastructure connecting the facility to the utility power grid will be removed unless the landowner determines that the electrical service line will be beneficial for future use of the site, in which case the line may remain after decommissioning. All wirings, cables, conduits, panelboards, inverters, transformers and associated equipment will be uninstalled and recycled as applicable. PV modules will be uninstalled and recycled as applicable, and the steel racking system will be disassembled and recycled as applicable. If feasible, glass and steel and aluminum will be processed and delivered to an off-site recycling center. Non-recyclable materials will be properly disposed of at a qualified disposal facility. The Petitioner expects that the value of the components of the array at the end of the project's useful life in either a salvage or re-sale scenario will be greater than the expected cost of decommissioning the facility.

Other Considerations

Thank you for the opportunity to review this application and to submit these comments to the Connecticut Siting Council. DEEP's comments are based on information available for review as of the date of this letter, which may not fully apply if elements of this petition are modified through the Siting Council's administrative review process. Since this petition may be modified, these comments should not be considered as a final endorsement or rejection for the public record.

Respectfully yours,

Laschone P. Garrison

Laschone P. Garrison
Environmental Analyst 3

CC: Katie Dykes, DEEP Commissioner