



Date: January 21, 2025

To: Connecticut Council on Environmental Quality, Environmental Monitor

From: Matthew Pafford, Supervising Environmental Analyst, Connecticut Department of Administrative Services, Real Estate and Constructions Services

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**RE: Post-Scoping Notice Memorandum of Findings and Determination  
for Capital Area System (CAS) Central Plant Upgrades in Hartford**

On [June 6, 2023](#), the Department of Administrative Services (DAS) published a scoping notice for the subject project to the Council on Environmental Quality's (CEQ) environmental monitor to solicit public comments in accordance with the Connecticut Environmental Policy Act (CEPA). On [June 20, 2023](#), DAS published an updated scoping notice to indicate that a virtual public-scoping meeting would be held on June 27, 2023. A recording of that meeting is on the [Capitol Area System website](#). Time-extension notices were published to the Environmental Monitor on [February 6, 2024](#), and [July 16, 2024](#).

The purpose of this CEPA scoping was to provide an opportunity for public comment to assist DAS in assessing potential options for upgrading the Capitol Area System (CAS) thermal facility to reduce costs, improve operations, and reduce environmental impacts, including greenhouse gas (GHG) emissions.

During the 30-day open public commenting period and public scoping meeting, DAS received comments from the Department of Energy and Environmental Protection (DEEP), the Office of Policy and Management (OPM) and members of the public. A table summarizing those comments and DAS responses is included as part of this review.

Along with the public comments received, several other factors were critical in DAS's review and determination of the potential environmental impacts of the proposed action:

- **2024 CAS Decarbonization Alternatives Study:** As part of the review process, DAS contracted with a third-party consultant to develop a decarbonization study of the CAS facility to identify potential scenarios to meet the stated objectives. The full study can be accessed by downloading the CAS Case Studies and Reports folder on the [Capitol Area System \(CAS\)](#) website maintained by DAS.

The study initially identified 22 potential scenarios and evaluated key metrics such as emissions impacts and cost. That list was further refined to identify the top-performing scenarios based on three priority categories: (1) lifetime carbon reduction, (2) lowest cost, and (3) a balance of the other two categories. See Figure D1 in Appendix J of the Study for more detail. DAS used the data from this study to assist in evaluating potential environmental impacts.



- **Decommissioning Power-Generation at the CAS Facility:** Prior to the state’s acquisition of the facility, the former owner worked with the Department of Energy and Environmental Protection (DEEP) to eliminate the power-generating function of the facility and substantially reduce the facility’s emissions outputs. This reduction was significant enough to revoke the facility’s Title V Permit, meaning that DEEP does not consider the facility a major source of air pollution and is no longer subject to state or federal Clean Air Act requirements. Emissions data used by DEEP indicate that decommissioning the facility’s power-generation function resulted in an immediate reduction of total GHG outputs by approximately 69% and continues to operate well below the thresholds for being classified as a major air polluter.
- **Realignment of I-84 in Hartford:** The Connecticut Department of Transportation’s (CTDOT) [Greater Hartford Mobility Study](#) proposes to realign significant sections of I-84 in Hartford. Several of the proposed alternatives could significantly impact the CAS facility and the surrounding property, including the potential need to relocate the CAS facility. However, the planning process for determining a recommended realignment is anticipated to take several years, and upgrades to the CAS facility are urgently needed to ensure the continued delivery of critical services for end users. This uncertainty regarding potential impacts to the CAS facility makes it challenging for DAS to justify a costly and expansive upgrade at this time.

After reviewing the information above and consulting with other state agency partners including DEEP, the OPM, and the Office of the Governor, DAS is proceeding with a project to replace and upgrade the existing mechanical infrastructure of the CAS facility to a system that includes a hybrid of heat pumps and natural gas condensing boilers.

This project will replace the existing mechanical infrastructure within the CAS facility, and will not change the facility's current use but will improve the efficiency, reliability, and environmental outcomes of its current operations. For the next steps, DAS will proceed with the design development of the selected scenario, focusing on emissions reductions within available funding limits.

**DAS has reviewed and considered public comments and other factors as required under CEPA and determined that the proposed action will not result in significant environmental impacts requiring the preparation of an Environmental Impact Evaluation (EIE). This concludes the agency’s CEPA review for this project.**

Should you have any questions, please email: [matthew.pafford@ct.gov](mailto:matthew.pafford@ct.gov)