



*STATE OF CONNECTICUT*

**COUNCIL ON ENVIRONMENTAL QUALITY**

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Paul Aresta  
*Executive Director*

**VIA ELECTRONIC MAIL**

May 28, 2025

Melanie Bachman, Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051  
[Melanie.Bachman@ct.gov](mailto:Melanie.Bachman@ct.gov)

PETITION NO. 1664 – VFS, LLC petition (Petitioner) for a declaratory ruling for the proposed construction, maintenance and operation of a customer-side 920-kilowatt fuel cell facility collocated with a 1.99-megawatt AC battery energy storage facility and associated equipment to be located at the Quinnipiac University North Haven Campus, 370 Bassett Road, North Haven, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1664.

**Environmental Information**

The Council notes that the materials submitted in connection with the subject Petition failed to include certain information that would assist the Council and the Siting Council to review the potential environmental impacts of the proposed project. While the petition materials include some information for the proposed fuel cells, there is limited information regarding the proposed battery energy storage system (BESS) equipment. The Council recommends that the Petitioner provide more information regarding the potential environmental impacts of the entire project (fuel cell and BESS), and the environmental protection measures for the proposed project including, but not limited to, erosion and sedimentation control; spill prevention; and emergency response for the proposed facility, including the BESS equipment.

**Noise**

The Petitioner states that “the nearest residential properties are over 870’ to the North of the proposed Facility”; however, the noise study and the maps provided indicate that the closest “home” (39 Bradley Road) would be located 96 meters west of the proposed facility. Further, the Petitioner states that the results of the noise assessment “show that the operation of the two 460 KW fuel cells will meet all of the State of Connecticut and Town of North Haven airborne noise requirements at all the nearby properties.” The Council notes that the noise study included the two proposed fuel cells, but there is no mention of the proposed BESS equipment, which, according to the proposed site plan, would be located approximately 16 feet from the cooling modules and 30 feet from the proposed fuel cells (power modules). The Council recommends that the Petitioner provide additional information regarding the total projected noise from the proposed facility with the BESS equipment and fuel cells at full operation at nearby residences and all adjacent noise zones. If the revised analysis for noise indicates that the proposed facility would not meet applicable noise standards, the Council recommends that the Petitioner provide

additional information regarding the noise mitigation measures that would be employed to ensure compliance with the applicable noise standards at the adjacent noise zones.

The Council's comments above address only certain elements of the materials provided by the Petitioner at the time of the filing. Additional information can become evident through comments offered by other parties and during the Siting Council's administrative hearing process. The absence of comment(s) by this Council about any Petition or Application, or any aspects thereof, may not be interpreted as an endorsement of a proposed project, or its components or that this Council might not have comments or concerns on more specific issues raised during the hearing process.

Thank you for your consideration of the Council's comments.

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive style with a long, sweeping underline.

Paul Aresta  
Executive Director