

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

**GRE GACRUX LLC petition for a declaratory ruling for the proposed construction, maintenance and operation of a 16.78-megawatt AC solar photovoltaic electric generating facility in Waterford, Connecticut. Reopening of this petition based on changed conditions.**

**Petition No. 1347A**

**June 18, 2020**

**SAVE THE RIVER-SAVE THE HILLS, INC. OBJECTION  
TO SITING COUNCIL'S ADMINISTRATIVE NOTICE LIST**

Save the River-Save the Hills, Inc. ("STR-STH") hereby objects to the following items on the Siting Council's Administrative Notice List, dated May 21, 2020. These objections are numbered to correspond to the items on the Council's list.

51. STR-STH objects to the inclusion of recusal memoranda for Michael Klemens and Robin Stein, two former members of the Council, because they are not relevant to this petition. Those memoranda were also issued in a separate Council proceeding that is not relevant to this petition.

52. STR-STH objects to the inclusion of the content of Petition No. 1056 under the doctrine of completeness. As the Council is aware, after it approved that petition and its associated development and management plan, the stormwater controls on that project failed. The developer was issued cease and desist notices from the local inland-wetlands commission and a Notice of Violation by DEEP. For the record to be complete with respect to that project, the Council must also take notice of those orders. STR-STH has placed them on its administrative notice list, and will withdraw this objection if the Council approves STR-STH's list.

54. STR-STH objects to the inclusion of the content of Petition No. 1312 under the doctrine of completeness. As the Council is or should be aware, since it approved that petition, the Town of New Milford filed its own petition for declaratory ruling with respect to the

development and management plan; several appeals have been taken from the original decision and that second petition; the Town of New Milford has filed two petitions for declaratory ruling with DEEP in connection with the developer's attempts to secure a General Permit; and DEEP has issued rulings on those petitions and rejected each of the General Permit registration applications. For the record to be complete with respect to that project, the Council must also take notice of those additional proceedings. STR-STH has placed them on its administrative notice list, and will withdraw this objection if the Council approves STR-STH's list.

57. STR-STH objects to the inclusion of Michael Klemens' brief email resigning from the Council because it is not relevant to this petition.

**SAVE THE RIVER-SAVE THE HILLS, INC.**

By: /s/ Emily A. Gianquinto  
Emily A. Gianquinto  
EAG Law LLC  
21 Oak Street, Suite 601  
Hartford, CT 06106  
Tel: (860) 785-0545  
Fax: (860) 838-9027  
emily@eaglawllc.com

CERTIFICATION

I hereby certify that a copy of the foregoing document was delivered by first-class mail and e-mail to the following service list:

Lee Hoffman  
Pullman & Comley LLC  
90 State House Square  
Hartford, CT 06103-3702  
lhoffman@pullcom.com

The Honorable Robert J. Brule  
First Selectman  
Waterford Town Hall  
15 Rope Ferry Road  
Waterford, CT 06385  
rbrule@waterfordct.org  
apiersall@waterfordct.org

Jean-Paul La Marche  
Development Manager  
Clean Focus Renewables, Inc.  
jean-paul.lamarche@cleanfocus.us

Deborah Moshier-Dunn  
VP, Save the River-Save the Hills, Inc.  
P.O. Box 505  
Waterford, CT 06385  
debm0727@sbcglobal.net

/s/ Emily A. Gianquinto  
Emily Gianquinto