

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 24, 2020

SAVE THE RIVER-SAVE THE HILLS, INC.'S AMENDED RESPONSE
TO CONNECTICUT SITING COUNCIL INTERROGATORY #4

Save the River-Save the Hills, Inc. ("STR-STH") hereby amends its response to the interrogatories issued by the Connecticut Siting Council as follows:

4. Please comment on the buffer zones to a "coldwater fish" [sic] resource" recommended by the Connecticut Council of Trout Unlimited in correspondence to the Department of Energy and Environmental Protection, Water Permitting and Enforcement Division, dated February 7, 2020, in response to a solicitation of comments by DEEP regarding the Proposed Reissuance with Modifications of the *General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities*. A copy is attached for your convenience.

RESPONSE: STR-STH refers the Council to the letter it received on June 18, 2020 from the Connecticut State Council of Trout Unlimited, clarifying its February 7, 2020 letter to DEEP and commenting on this project. STR-STH further refers the Council to the Supplemental Pre-filed Testimony of Donald J. Danila, submitted June 24, 2020.

In sum, STR-STH believes that the 100-foot buffer from coldwater fish resources that Trout Unlimited proposed be added to the General Permit is a welcome addition to the Construction General Permit, which is currently silent with respect to coldwater fish resources, so they are not considered at all when applicants register for the General Permit. STR-STH agrees that adding a minimum buffer to the General Permit requirements is a step in the right direction in recognizing the value of coldwater fish resources and their sensitivity to

stormwater pollution. However, STR-STH does not believe that proposed minimum requirement of 100 feet is an adequate buffer in all circumstances. At this site, that minimum buffer would certainly not be enough to protect the very high quality coldwater fish resources that are the tributaries to the Niantic River Estuary, for all of the reasons STR-STH has provided in its past comments and interrogatory responses and in the pre-filed testimony of its witnesses.

SAVE THE RIVER-SAVE THE HILLS, INC.

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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:

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