

## RESPONSES OF WINDHAM SOLAR, LLC TO INTERVENOR INTERROGATORIES

On February 3, 2021, the City of Ansonia issued Interrogatories to Windham Solar, LLC (“Petitioner”) relating to Petition No. 1395A. The Petitioner provides the following responses.

1. *The petition makes reference to sheep and grazing. Does this use conform to the municipal regulations regarding the keeping of livestock, farming, and the minimum setbacks required for structures incidental to, and associated with farming and grazing activities?*

**RESPONSE:** Yes.

Section 720.1 of the City’s Zoning Regulations states: “All structures for the keeping and feeding of livestock and the open or covered storage of manure, fertilized, lime, or herbicides and pesticides and associated equipment, shall be at least one hundred (100) feet from any property line, and one hundred (100) feet from any residential structure on the same lot.” Section 4-1 of the Municipal Code states: “Every person who shall keep any geese, ducks, fowl, horses, cattle, goats or other animals in the city shall keep and maintain the building, stable, pen or other place in which such geese, ducks, fowl, horses, cattle, goats or other animals shall be kept in such a clean condition and dispose of the manure in such a manner that the neighbors or persons passing in the street shall not be incommoded by the smell therefrom.”

Although it is not anticipated that there will be a need for structures on the site to keep the sheep, if structures are needed, they would comply with Section 720.1. The Petitioner will also comply with section 4-1.

2. *The petition makes reference to sheep and grazing on the same site, parcel, and project located at 31 Benz Street, while the majority of the petition and supporting material refers to a solar development project. Is Petitioner's intention to develop a mixed-use project at 32 Benz Street? And if so, is this use permitted in either the enabling state legislation or the municipal zoning regulations?*

**RESPONSE:** No. The Petitioner is not developing a mixed-use project. The specific purpose for which land is developed and designed is for solar facility.

3. *The current State Plan of Conservation and Development Locational Guidemap identifies the land subject to this petition as being in the priority funding areas of 3 and 4. Is Petitioner's proposed development consistent with the state's Plan of Conservation and Development?*

**RESPONSE:** The State Plan of Conservation and Development Locational Guidemap is not relevant to the Petition. The solar facility proposed by the Petitioner is a private enterprise and not a state-sponsored action subject to Conn. Gen. Stat. § 16a-35c.

4. *Describe the visibility of the project and project apparatus (such as solar panels) from Benz Street, and the surrounding private residences.*

**RESPONSE:** Please see Section VI. D “Scenic Values and Visual Renderings”, page 13 of the Petition.