



2020, the Proponents for Responsible Emplacement of Stonington Solar (“PRESS”), filed its Request for Party Status (the “PRESS Request”) and Notice of CEPA Intervention. According to the PRESS Request, PRESS is comprised of “residents in Stonington, Connecticut, who live in close proximity to the [proposed “Project,” and] all of whom [. . .] are members of the High Ridge Homeowners Association,” an association of property owner’s whose residences directly abut the parcel where the Project is to be constructed.

As an abutting property owner, similarly situated as the members of PRESS, Hanson is concerned that the Project plans will not adequately control and treat the storm water that will be running off of the impervious panels of the solar array. He is also generally concerned of the impact the Project will have on the environment, including without limitation, the protection of local wetlands and watercourses. The location and sizing of the single storm water basin proposed for each grouping of panels is inadequate to protect the surrounding properties, including Hanson’s, from impacts of storm water runoff and do not comply with the CT DEP 2004 Storm Water Quality Manual. Hanson is concerned with the possible leaching of chemicals used in solar panels, including lead, cadmium, and PFAS, into the ground abutting his property, and the contamination of protected groundwater.

Additionally, the Project is proposed to be constructed in proximity to wetlands that drain into Anguilla Brook, and eventually into Fishers Island Sound, thus there is potential for leaching chemicals to cause damage to protected wetlands if the proposed Project’s Storm Water control plans are inadequate. Additionally, Hanson shares PRESS’s concern that the Petition lacks a plan respecting fire safety, and the potential for fires affecting the arrays to cause the release of chemicals into the ground.

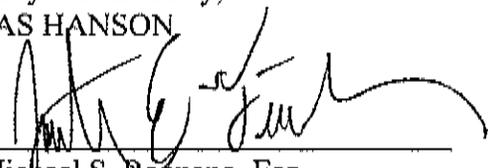
For the foregoing reasons, Hanson contends that the Petition does not provide the Siting Council with information necessary to fulfill its obligation to balance the need for adequate and reliable public utility services at the lowest reasonable cost to consumers with the need to protect the environment and ecology of the state and to minimize damage to the scenic, historic, and recreational values while also assuring the welfare and protection of the people of the State of Connecticut.

The CEPA permits any person to “intervene as a party upon the filing of a verified pleading asserting that the proceeding or action for judicial review involves conduct which has, or which is reasonably likely to have, the effect of unreasonably polluting, impairing or destroying the public trust in the air, water or other natural resources of the state.” C.G.S. § § 22a-19(a); 22a-20. Hanson continues to object to the Project on the basis previously asserted in his July 2, 2020 request to be made a party, but also wishes to assert and preserve his right to proceeding not only as a party, but as a CEPA Intervenor for the reasons stated herein, and so that he may present evidence relating to the adverse impact the Project will have on the groundwater, wetlands, forest, and other natural resources located on and around the Project site.

WHEREFORE, Douglas Hanson respectfully requests that his designation as a Party be modified to include a party for CEPA Intervention.

Respectfully submitted by,  
DOUGLAS HANSON

By:



Michael S. Bonnano, Esq.  
[mbonnano@geraghtybonnano.com](mailto:mbonnano@geraghtybonnano.com)

Jonathan E. Friedler, Esq.  
[jfriedler@geraghtybonnano.com](mailto:jfriedler@geraghtybonnano.com)

Geraghty & Bonnano, LLC  
38 Granite Street, New London, CT 06320  
860-447-8077

CERTIFICATION

I hereby certify that on this 17<sup>th</sup> day of August, 2020 that the foregoing was delivered by electronic mail and regular mail, postage prepaid, in accordance with § 16-50j-12 of the Regulations of Connecticut State Agencies, to all parties and intervenors of record, as follows:

The Citing Council [siting.council@ct.gov](mailto:siting.council@ct.gov)  
with paper copy to  
*Connecticut Siting Council*  
*State of Connecticut*  
*Ten Franklin Square*  
*New Britain, CT 06051*

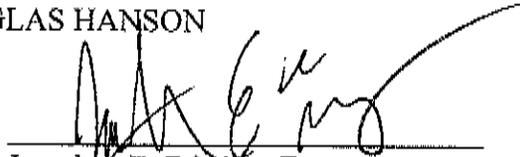
Counsel for Greenskies Clean Energy, LLC [Lhoffman@pullcom.com](mailto:Lhoffman@pullcom.com)  
Lee D. Hoffman, Esq.  
Pullman & Comley, LLC  
90 State House Square  
Hartford, CT 061003-3702

Greenskies Clean Energy, LLC [Gina.wolfman@cleanfocus.us](mailto:Gina.wolfman@cleanfocus.us)  
Gina L. Wolfman  
Senior Project Developer  
Greenskies Clean Energy, LLC  
127 Washington Avenue  
West Building, Garden Level  
North Haven, CT 06473

Counsel for PRESS  
Emily Gianquinto, Esq. [emily@eaglawllc.com](mailto:emily@eaglawllc.com)  
21 Oak Street, Suite 601  
Hartford, CT 06106

DOUGLAS HANSON

By:

  
\_\_\_\_\_  
Jonathan E. Friedler, Esq.  
[jfriedler@geraghtybonnano.com](mailto:jfriedler@geraghtybonnano.com)