

STATE OF CONNECTICUT

Greenskies Clean Energy, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 3.0-megawatt-AC solar photovoltaic electric generating facility on two parcels at the Elmridge Golf Course located to the east and west of North Anguilla Road at the intersection with Elmridge Road, Stonington, Connecticut, and associated electrical interconnection.

Petition No. 1410

September 24, 2020

DOUGLAS HANSON'S RESPONSES TO Greenskies Clean Energy, LLC's Interrogatories dated September 17, 2020

Please respond to the foregoing interrogatories no later than September 24, 2020, pursuant to the Connecticut Siting Council's Revised Schedule of August 27, 2020.

Several of these interrogatories refer to that certain Party Status Request Form that was submitted on behalf of Mr. Hanson to the Connecticut Siting Council on July 2, 2020. For purposes of these interrogatories, that correspondence shall be referenced to as the "Party Request Form."

1. What land uses does Mr. Hanson believe are appropriate and/or suitable for the proposed Project Site?

Appropriate uses are defined and administered by the Town of Stonington Planning and Zoning. The West Project Area is zoned by the Town of Stonington as GBR-130. The Zoning Regulations define it thusly: "This zone is located on fragile aquifer, watershed, streambelt, inland wetland and significant adjoining areas so as to preserve them for the future and present needs." The East Project Area is zoned by the Town of Stonington as RR-80 and is defined in the Regulations thusly: "This zone is located in areas where the general land conditions dictate lower capability for development. This density is in keeping with the stated purpose of retaining the rural character of the town."

In addition to this, I believe that "appropriateness" of a use can be judged upon the impact on neighboring parcels, in this case, my home. Therefore, the project, as proposed in its current form is inappropriate, in my belief because of its impact upon my home. Even if a use is permitted by the Planning and Zoning Regulations, does not necessarily mean it is a use that does not create a nuisance impact on neighboring parcels.

2. Of the following land uses, which (if any) does Mr. Hanson believe to be appropriate and/or suitable for the proposed East Project Area:¹

- a. Public utility substations;

In response to this interrogatory, Mr. Hanson incorporates his response to Interrogatory #1 above. Simply stating this proposed use without proper detail does not provide enough detail for me to be able to simply state that this use is "appropriate and/or suitable."

- b. Agriculture and the keeping and breeding of livestock (with a 200' setback for manure storage and stables);

See above response to Interrogatory #2a.

- c. Duplex housing;

See above response to Interrogatory #2a .

- d. Public utility structures and facilities;

See above response to Interrogatory #2a .

- e. Communication and water towers;

See above response to Interrogatory #2a .

- f. Municipal facilities;

See above response to Interrogatory #2a .

- g. Public and private elementary and secondary schools;

See above response to Interrogatory #2a .

- h. Trailer parks and trailer camps (with 50 feet of buffer and 30 feet of screening);

¹ For purposes of these Interrogatories, the term "East Project Area" shall be defined as that certain parcel bounded to the north by Elm Ridge Road, within a lot containing nine (9) holes of the golf course, a driving range, club house, small maintenance building, and a residence (Stonington Assessment Department Parcel ID 22-2-1), and the term "West Project Area" shall be defined as that certain parcel bounded by residential lots to the north, N. Anguilla Rd. to the east, open space and a residential lot to the south and Interstate 1-95 to the west (Stonington Assessment Department Parcel ID 39-1-9).

See above response to Interrogatory #2a .

- i. Lumbering and mills;

See above response to Interrogatory #2a.

- j. Excavation operations;

See above response to Interrogatory #2a.

- k. Cemeteries;

See above response to Interrogatory #2a.

- l. Crematoriums and funeral homes

See above response to Interrogatory #2a .

- m. Congregate living facilities;

See above response to Interrogatory #2a.

- n. Hospitals; and/or

See above response to Interrogatory #2a.

- o. Convalescent homes

See above response to Interrogatory #2a.

- 3. Does Mr. Hanson believe that a maximum height of 30 feet for a structure is fair and reasonable for structures to be placed on the proposed East Project Area?

Mr. Hanson believes that there are certain height restrictions for the East Project Area based on the RR-80 zoning regulations.

- 4. Of the following land uses, which (if any) would Mr. Hanson consider to be appropriate and/or suitable for the proposed West Project Area:
 - a. Agriculture and the keeping and breeding of livestock (with a 200' setback for manure storage and stables);

See above response to Interrogatory #2a.

- b. Public utility structures and facilities;

See above response to Interrogatory #2a.

- c. communication and water towers;

See above response to Interrogatory #2a.

- d. Kennels;

See above response to Interrogatory #2a.

- e. Lumbering and lumber mills;

See above response to Interrogatory #2a.

- f. municipal facilities; and/or

See above response to Interrogatory #2a.

- g. public or private elementary and secondary schools.

See above response to Interrogatory #2a.

- 5. Does Mr. Hanson believe that a maximum height of 30 feet for a structure is fair and reasonable for structures to be placed on the proposed West Project Area?

Mr. Hanson believes that there are certain height restrictions for the West Project Area based on the GBR-130 zoning regulations.

- 6. Referring to page 1 of the Party Request Form, has Mr. Hanson conducted an independent noise study and modeling analysis for the proposed Project? If so, please provide the results of any such study and/or modeling analysis.

Like the petitioner, Mr. Hanson has not conducted this type of study.

- 7. What appraisals does Mr. Hanson possess that supports his assertion that the proposed Project will have a "deleterious effect" on the value of his property? *See* Party Request Form, p. 2. Please provide such appraisals.

Mr. Hanson does not possess any appraisals currently.

- 8. Has Mr. Hanson reviewed the Petitioner's proposed operation/maintenance ("O&M") plans for the Project? *See* Party Request Form, p. 1.

Mr. Hanson has cursorily reviewed the O&M plans.

9. Are the proposed O&M activities for the Project (including frequency thereof) more or less disruptive than that which is generally required for the maintenance and operation of a golf course?

Mr. Hanson has no idea if the proposed O&M activities would be more or less disruptive than the current operations of the golf course. Mr. Hanson believes that it is common sense that the addition of a solar farm in that location, where there is none presently, will likely obviously increase a level of disruptiveness since there is no solar farm there presently, that requires O&M activities.

10. Does Mr. Hanson believe that the Project Site's golf course operations (and associated maintenance) interferes with his right to quiet enjoyment? Please explain why or why not.

For the purpose of Mr. Hanson's response, he is assuming the interrogatory as posed, is asking him whether the current (pre-solar farm) golf operations interferes with his right to a quiet enjoyment of his home. There answer is, "No." Because when he purchased the property, he observed the golf course operations and determined it would not interfere with his quiet enjoyment.

11. Has Mr. Hanson ever personally visited a site that contains a commercial solar facility? If so, please identify the site/solar facility.

Yes, Mr. Hanson has visited several solar plants along the Interstate Route 95 corridor in Rhode Island.

12. If the answer to Interrogatory No. 12 above is "Yes", did Mr. Hanson observe anything about the noise emitting therefrom? Please detail said observations.

Yes. The solar plants visited have various levels of noise emitting from them. Some clearly louder than others.

DOUGLAS HANSON

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CERTIFICATION

I hereby certify that on this 24th day of September, 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

with paper copy to

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