

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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TESTIMONY OF  
GINA WOLFMAN  
IN CONNECTION WITH  
PETITION 1410

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SEPTEMBER 24, 2020

1 **Q. Please state your name, occupation and business address.**

2 A. My name is Gina L. Wolfman. I am a Senior Developer & Permitting Specialist at  
3 Greenskies Clean Energy LLC (“Petitioner” or “Greenskies”), formerly based in  
4 Middletown, CT, and now headquartered at 127 Washington Ave., West Bldg., Lower  
5 Level, North Haven, CT.

6 **Q. What are your responsibilities at Greenskies?**

7 A. Among my other responsibilities, I am the Greenskies’ Project Manager for  
8 development of the solar PV facility that is the subject of Petition #1410. My overall  
9 responsibilities as a member of the Development Team are the management of the  
10 permitting and interconnection processes for large-scale ground-mounted solar PV  
11 projects. In early-stage project development, I work with other members of our team to  
12 analyze site feasibility. I coordinate with environmental consultants performing various  
13 studies at our project sites, and with civil and electrical engineers performing design work  
14 for projects under development. And, as noted above, responsibilities include land use  
15 permitting of commercial-scale solar PV facilities.

16 **Q. In addition to the project that is the subject of this Petition, have you**  
17 **been involved in other commercial-scale solar PV developments?**

18 A. Yes. I managed the development of a 5 +/-MWAC commercial-scale solar PV  
19 facility at 35 Taugwonk Spur Rd., in Stonington, CT; the project is currently under  
20 construction. I’m also co-managing the development of a 19.8 MW solar PV facility out-  
21 of-state in Maine. In addition, I’ve managed various development phases of six, and the  
22 permitting of three solar PV facilities in Massachusetts and assisted with the permitting  
23 and development of several others in that state. I’m also coordinating and collaborating  
24 with other Development Team members on various tasks on other projects in  
25 Connecticut.

26 **Q. What other relevant professional experience do you have?**

27 A. I have over twenty years of experience in the environmental consulting, land use  
28 planning, and hazardous waste remediation fields. Before joining Greenskies, I was most

1 recently employed as a Senior Project Manager for an environmental consulting firm,  
2 focusing on site investigation, remediation design, and construction-remediation  
3 oversight for Brownfield redevelopment sites in the New York City metro area, upstate  
4 New York, and southern New England. I previously worked as an environmental and land  
5 use planner focusing on permitting and environmental impact analysis for large-scale  
6 commercial, residential, and mixed-use development projects.

7 In addition, I've been employed as a municipal planning and zoning consultant, reviewing  
8 site plan, subdivision and wetlands permit applications. I hold a JD and Certificate in  
9 Environmental Law (CEL), am admitted to the New York Bar, and studied environmental  
10 science and wildlife biology as an undergraduate, as well as earned a Wetland Delineation  
11 Certificate through Cook College, Rutgers University. Some of the courses I completed for  
12 the CEL were Land Use Law, Chemical Regulation, and Conservation Law.

13 **Q. To your knowledge, what other land uses would be permitted at the**  
14 **subject property and would they result in a significant visual impact?**

15 A. My opinion on whether the proposed Project would result in a significant visual  
16 impact to a particular residence is subjective and would be derived by weighing such  
17 change in visual character against those resulting from other potential uses of the site.  
18 The proposed East Project area is zoned RR-80, which allows for the development of  
19 various land uses "as of right" by a landowner. To my knowledge and based on my review  
20 of the Town of Stonington Zoning Regulations, those uses include: public utility  
21 substations, agriculture and the keeping and breeding of livestock (with a 200' setback  
22 for manure storage and stables), and duplex housing. Additional uses allowed by Special  
23 Permit in the RR-80 zoning district include: communication and water towers, municipal  
24 facilities, public or private elementary and secondary schools, trailer parks and trailer  
25 camps (with 50 feet of buffer and 30 feet of screening), and lumbering and lumber mills.  
26 Other Special Permit uses include: excavation operations (with 100 feet of buffer);  
27 cemeteries, crematoriums and funeral homes; congregate living facilities, hospitals and  
28 convalescent homes.

29 The proposed West Project area is zoned GBR-130. It is my understanding that permitted  
30 or "as-of-right" uses in this zone include agriculture and the keeping and breeding of

livestock (with a 200' setback for manure storage and stables), family day care, and residential. To my knowledge, uses allowed by Special Permit in the GBR-130 zoning district include: public utility structures and facilities, communication and water towers, kennels, lumbering and lumber mills, municipal facilities, and public or private elementary and secondary schools.

**Q. Under local zoning what are the relevant, required dimensional/bulk and screening requirements for the two project sites?**

A. Bulk requirements for the RR-80 zone include: front, side and rear yard setbacks of 50 ft., 25 ft., and 50 ft., and a maximum height of 30 ft. Residential zone bulk requirements for the GBR-130 district include: front, side and rear yard setbacks of 75 ft., 30 ft. (total both sides 100 ft.) and 100 ft. with a maximum height of 30 ft.

Buffer requirements for the RR-80 zone include 100 feet for processing and excavations, 50 feet for duplex, trailer parks and community facilities with 30 feet of screening, and 25-100 feet for significant natural resources. Buffer requirements for the GBR-130 zoning district are limited to a minimum 100-foot non-infringement area from wetlands, streams, ponds and other significant natural resources. The West Project area meets this requirement. In addition, in both zones, agriculture and the keeping and breeding of livestock requires a 200' setback for manure storage and stables.

**Q. How does the proposed project compare to setback and buffer requirements of local zoning?**

A. Setbacks in the East Project Area significantly exceed applicable zoning requirements. The setbacks for the Project in the East Array Area include a front yard of 180 – 200+/- ft. (as compared to the 50 ft. required), a west side yard of greater than 500 ft. (25 ft. required) and a rear yard of 180 +/- ft. (50 ft. required). Setbacks for the West Project Area are similarly conservative. These setbacks include a front yard of greater than 100 +/- ft. (75 ft. required), a northern side yard of 80 – 140 +/- ft. (30 ft. required), a southern side yard of greater than 300 ft. (30 ft. required) and a rear yard of greater than 450 ft. (100 ft. required). The upper edge of the modules within the proposed solar arrays is less than 10 feet.

1 As for buffer and screening requirements, the East Project Area could be developed as  
2 duplex housing, trailer park or trailer camp, a community center or library with 50 feet of  
3 buffer and 30 feet of screening; and excavation operation and processing, bottling or  
4 conversion of agricultural products grown on the property with 100 feet of buffer.

5 **Q. Based on your review of Town of Stonington Zoning Regulations and**  
6 **various land use plans, as well as your experience, does the proposed**  
7 **project fit within the guidance regarding use and character?**

8 A. Yes. In my opinion, and based on my review of local zoning and municipal land use  
9 plans, I believe the Proposed project is a compatible use for the landowner's property  
10 within the neighborhood and surrounding area. Great effort was made in siting and  
11 designing the Project on the subject parcels with regard to the distance and provided  
12 setbacks from, and within, public viewsheds along Elmridge and N. Anguilla Roads. In  
13 addition, MMI designed the proposed Project to maintain and take advantage of the  
14 screening character of existing vegetative buffers, proposed landscaping, and the use of  
15 green slatted fencing rather than standard chain link style.

16 As noted in my response to the previous question, the proposed Project far exceeds the  
17 minimum setback requirements for both the RR-80 and GBR-130 zoning districts, and  
18 is far shorter than the maximum allowable height of 30 ft. for a structure in each zone.  
19 The upper edge of the modules in the proposed arrays is less than 10 feet.

20 In my opinion, the Proposed project design is consistent with local land use plans. There  
21 are no historic or scenic designations by the State or Town for the Project parcels, and the  
22 proposed Project will not generate any significant noise (at any potential receptors),  
23 lighting, public safety issues or environmental impacts. The proposed Project will also  
24 allow for the continued "managed open space" classification of the property. It is intended  
25 for the solar arrays to be decommissioned at the end of the Project's life, and the land can  
26 revert to an undeveloped status or put to other uses as the property's owner(s) see fit at  
27 that time.

28 **Q. Did Petitioner's consultant perform additional visibility assessment**  
29 **work? If so, what was the extent of such work?**

1 A. Yes, Greenskies engaged Milone & MacBroom (MMI), the project environmental  
2 consultant and civil engineer, to perform the following additional three visual  
3 simulations: 1. View from N. Anguilla Rd. looking toward the West Project area; 2. View  
4 from 5 Fairway Ct. to the East Project area; and 3. View from the rear yard of 143 N.  
5 Anguilla Rd. looking toward the West Project area. Those simulations have been included  
6 with the testimony of Michael Gagnon.

7 **Q. Can you please confirm if any hazardous chemicals are included in**  
8 **the modules and if there are risks of leakage and/or leaching?**

9 A. No hazardous chemicals are contained within the specified modules and/or  
10 comparable products Greenskies' would procure for the proposed Project that would  
11 result in a risk of leaching causing harm to human health or the environment. The  
12 modules do not contain PFAS or its derivatives. In addition (and according to the  
13 manufacturer), selenium, cadmium, arsenic or heavy metals (other than lead) are not  
14 contained within the selected or comparable modules. Lead is present in soldering paste,  
15 typically used to connect cells together within the panel.

16 Using the USEPA Toxicity Characteristics Leaching Procedure (TCLP) for sample  
17 preparation, the manufacturer had its solar panels analyzed for a full range of organic and  
18 inorganic compounds. TCLP is an extraction method for chemical analysis employed as a  
19 method to simulate leaching through a landfill from a solid material (in this case the  
20 module/panel) that has been crushed, compacted and/or pulverized, not from normal  
21 operating conditions or anticipated, potential accidents such as storm damage. Results  
22 showed one detection of Lead below the regulatory limit. This testing is discussed further  
23 in the response to the next question.

24 **Q. Do you have any clarifications on any responses to previous**  
25 **interrogatories submitted by the CT Siting Council or either of the Parties?**

26 A. Yes. I would like to clarify and make a correction to the language below, provided  
27 in Greenskies' response to Town of Stonington comments under "Groundwater  
28 Concerns", page 3, paragraph 1, as well as Greenskies' response to Douglas Hanson's  
29 Interrogatory 3, page 2, paragraph 3:

1 “Results showed one detection of Lead, below the Maximum Contaminant Level for  
2 drinking water.”

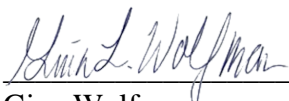
3 The one detection of Lead was below the “Maximum Concentration of Contaminants for  
4 the Toxicity Characteristic” found in Table 1 of USEPA regulations at 40 CFR Section  
5 261.24. A solid waste exhibits the characteristic of toxicity if, the extract from a  
6 representative sample of the waste contains any of the contaminants listed in Table 1 at  
7 the concentration equal to or greater than the respective value provided. The “Limit”  
8 column in the laboratory report (Exhibit B of responses to Mr. Hanson’s comments)  
9 corresponds to, and represents, the Maximum Concentration of Contaminants for the  
10 Toxicity Characteristic, as noted above. This sampling for toxicity characterization is used  
11 by landfills in determining whether waste is considered acceptable for municipal facilities  
12 or is considered “hazardous waste.” I’d like to clarify that the “MDL” column represents  
13 the minimum detection limits for the laboratory instrumentation and methodology.

14 **Q. Since the Petitioner made its filing in this matter, have you had any**  
15 **contact with representatives of the Town of Stonington?**

16 A. Yes. On September 22, 2020, Keith Brynes, the Town Planner for the Town of  
17 Stonington sent me an e-mail. That e-mail indicated that the Town had sent Greenskies’  
18 responses to the Town’s concerns about the Project to the Town’s engineers, CLA  
19 Engineers of Norwich. CLA indicated to the Town that the concerns CLA had identified  
20 had been addressed by the Project. A copy of that e-mail is attached to my testimony as  
21 Exhibit A.

22 [REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

IN WITNESS WHEREOF, the undersigned has executed and delivered this testimony as of the date set forth above.

By:   
Name: Gina Wolfman  
Title: Senior Developer and Permitting Specialist

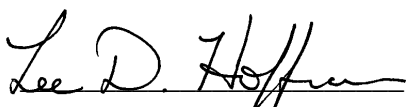
STATE OF CONNECTICUT )

) SS: HARTFORD

COUNTY OF HARTFORD )

On this 24th day of September, 2020, before me, the undersigned, Gina Wolfman, personally appeared via Zoom, and she is known to me to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same as her free act for the purposes therein contained.

In witness whereof, I hereunto set my hand.

  
Lee D. Hoffman  
Commissioner of the Superior Court



## Exhibit A

**From:** Keith Brynes <[kbrynes@stonington-ct.gov](mailto:kbrynes@stonington-ct.gov)>  
**Sent:** Tuesday, September 22, 2020 4:27 PM  
**To:** Gina Wolfman <[gina.wolfman@cleanfocus.us](mailto:gina.wolfman@cleanfocus.us)>  
**Subject:** FW: Elm Ridge Solar responses

Gina,

We referred your responses to CLA Engineers who found that in general their comments were addressed.

Thanks  
Keith

Keith A. Brynes, AICP  
Town Planner  
152 Elm Street  
Stonington, CT 06378  
860-535-5095  
[kbrynes@stonington-ct.gov](mailto:kbrynes@stonington-ct.gov)

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**From:** B DeLuca <[bdeluca@claengineers.com](mailto:bdeluca@claengineers.com)>  
**Sent:** Monday, September 21, 2020 9:30 AM  
**To:** Keith Brynes <[kbrynes@stonington-ct.gov](mailto:kbrynes@stonington-ct.gov)>  
**Cc:** Barbara McKrell <[bmckrell@stonington-ct.gov](mailto:bmckrell@stonington-ct.gov)>; Danielle Chesebrough <[dchesebrough@stonington-ct.gov](mailto:dchesebrough@stonington-ct.gov)>; Christopher Greenlaw <[cgreenlaw@stonington-ct.gov](mailto:cgreenlaw@stonington-ct.gov)>; Dave Rathbun <[dmrathbun@gmail.com](mailto:dmrathbun@gmail.com)>  
**Subject:** RE: Elm Ridge Solar responses

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Keith,

We reviewed and find that in general our comments have been addressed.

Bob

**Robert A. DeLuca, P.E.**  
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*Consulting Civil Engineers Since 1984*

**From:** Keith Brynes [<mailto:kbrynes@stonington-ct.gov>]  
**Sent:** Thursday, September 3, 2020 2:54 PM  
**To:** B Deluca <[bdeluca@claengineers.com](mailto:bdeluca@claengineers.com)>  
**Cc:** Barbara McKrell <[bmckrell@stonington-ct.gov](mailto:bmckrell@stonington-ct.gov)>; Danielle Chesebrough <[dchesebrough@stonington-ct.gov](mailto:dchesebrough@stonington-ct.gov)>; Christopher Greenlaw <[cgreenlaw@stonington-ct.gov](mailto:cgreenlaw@stonington-ct.gov)>; Dave Rathbun <[dmrathbun@gmail.com](mailto:dmrathbun@gmail.com)>  
**Subject:** Elm Ridge Solar responses

Bob,

Can you please review Greenskies' responses to your comments and offer any follow up? As far as a timeframe, the town has to decide by 9/24 whether to participate in the Siting Council's public hearing and whether there are remaining engineering concerns is a main part of it. There are not any revised plans.

Thanks  
Keith

Keith A. Brynes, AICP  
Town Planner  
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