

**Lee D. Hoffman**  
90 State House Square  
Hartford, CT 06103-3702  
p 860 424 4315  
f 860 424 4370  
lhoffman@pullcom.com  
www.pullcom.com

September 21, 2018

**VIA E-MAIL AND U.S. MAIL**

Melanie Bachman  
Acting Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

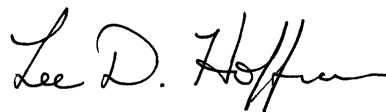
**Re: Petition 1347 - GRE GACRUX LLC Petition for a Declaratory Ruling, Pursuant to Connecticut General Statutes §4-176 and §16-50k, for the Proposed Construction, Maintenance and Operation of a 16.78 MW AC Ground-mounted Solar Photovoltaic Electric Generating Facility Located on Oil Mill Road in Waterford, Connecticut**

Dear Ms. Bachman:

I am enclosing an original and sixteen copies of GRE's First Set of Interrogatories to Save the Rivers-Save the Hills in the above-referenced Petition. Please return one copy of this submittal, date-stamped, to me in the enclosed envelope.

If you have any questions concerning this submittal, please contact the undersigned at your convenience. I certify that copies of this submittal have been submitted to the Town of Waterford and to counsel for Save the River-Save the Hills.

Sincerely,



Lee D. Hoffman

Enclosures

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**Petition of GRE GACRUX LLC for a Declaratory Ruling pursuant to C.G.S. §4-176 and § 16-50k, for the proposed construction, maintenance and operation of a 16.78 MW AC ground-mounted solar photovoltaic electric generating facility located at 117 Oil Mill Road and associated electrical interconnection to Eversource Energy's existing substation at 325 Waterford Parkway North in Waterford, Connecticut**

**Petition No. 1347**

**September 21, 2018**

**GRE GACRUX LLC'S FIRST SET OF INTERROGATORIES DIRECTED TO SAVE  
THE RIVERS-SAVE THE HILLS, INC.**

1. Please produce every document read, relied on, or referred to by Trinkaus Engineering, LLC to form its opinion in this matter.
2. Please state each opinion Trinkaus Engineering was retained to provide, the factual basis of that opinion, and its scientific basis, if applicable.
3. Did any member of Save the Rivers-Save the Hills visit the Site in question?
4. Did any member of Trinkaus Engineering, LLC visit the Site in question before preparing the August 18, 2018 report?
5. Are the conclusions in the August 18, 2018 report based on personal observations of the Site?
6. If a representative of Trinkaus Engineering, LLC did not personally observe the conditions at the Site, identify what information was provided to Trinkaus Engineering, LLC to form its opinion in this matter.
  - a. Did Trinkause Engineering, LLC verify the accuracy of said information? If so, how was such information verified?

**Forestry Issues**

7. Explain the environmental impacts to the Site that would be anticipated to occur as a result of the harvesting of trees on the Site by the current owner, the bulk of which has already been completed.
  - a. Do those environmental impacts differ in any way from those that were provided under the "Forestry Issues" section of the August 18, 2018 report?
  - b. If the environmental impacts differ, please describe how they differ.

8. Explain the environmental benefits that will be lost, in quantitative terms, if the Project is completed.
9. Explain the environmental benefits that will be lost, in quantitative terms, if the Project is not completed.
10. What environmental benefits will be lost if the Site is developed as residential property, in keeping with its current zoning designation?
11. Explain how the environmental benefit of the Site would be maintained if the Site were developed in accordance with its permanent zoning, as opposed to a solar panel facility.
12. Specify which terrestrial and aquatic species currently on the Site will be adversely affected by the Project's completion. Please provide any materials relied upon in making this determination.
13. Is it the installation of the solar panels or the alleged deforesting that will "eliminate significant forest habitat for terrestrial and aquatic species" as described in the August 18, 2018 report?
14. Given that the land owner has already harvested trees from the proposed area and that the solar project will include planting of low growth vegetation, is there any evidence that there will be negative effects on the forestry from developing solar in compared to the current site?
15. Please describe all terrestrial and aquatic species that would benefit from the installation of solar panels on the Site.
16. Describe what impact, quantitatively, the disturbance and regrading of the soil will have on the Site in question. Please provide any materials relied upon in making this determination.

### **Stormwater Management Report**

17. Identify what metals will be leached from the support system of the solar panels and the quantity of metals that will be leached on an annual basis. Please provide any materials relied upon in making this determination.
18. Explain, quantitatively, the extent that such metals will so leach to the wetlands and watercourses, and the impact that any such leaching will have on the environment.
19. Will the project be required to obtain a stormwater permit from the Connecticut Department of Energy and Environmental Protection in order to construct the project as described in this Petition?
20. Explain the basis for the contention in the August 18, 2018 report that the runoff directed to the level spreader will not infiltrate and seep into the ground.

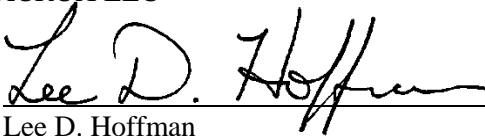
21. Explain the basis for the contention in the August 18, 2018 report that none of the runoff from the solar panels to the gravel beds will seep into the ground below.
22. Please provide all materials relied upon for the contention in the August 18, 2018 report that all of the rain falling on the panels must be considered “runoff.”
23. Please provide all stormwater calculations that were completed to form the basis of the August 18, 2018 report.
24. Please provide calculations demonstrating why the project will increase run off volumes as stated in storm water management section 2 on page 2 of the Trinkaus Report.
25. Refer to section 7 on page 3 of the Trinkaus Report. Please provide documentation and evidence as to what causes higher peak rates and run off volumes, and what those higher peak rates and run off volumes will be.
26. Refer to section 8 on page 3 of the Trinkaus Report. That section mentions that changing of soil classification depends on grading. Was the project grading taken into account in the analysis that results in higher peak rates and run off volumes? Does state building code prescribe change of soiling classifications?
27. Refer to the ground cover ratio required by CT DEEP stormwater regulations. Given the current design of the Project, which has a distance between rows of panels of 14.5 feet, and that the panel heights will be less than 14.5 feet, explain why the current design is not considered 100% pervious pursuant to CT DEEP stormwater requirements.
28. Please provide calculations that demonstrate the alleged temperature increases in storm water basins and how much of an impact that will have on nearby water temps.
29. Explain, quantitatively, how much higher the peak rate and runoff volume will be than is currently indicated in the stormwater management report, and the extent to which the proposed stormwater basins are therefore undersized.
30. What percentage of the Class B soil is it claimed will act as Class C or D soil, and quantitatively, how will such claimed alteration affect runoff volumes?
31. Please provide all specific examples of any instances of non-compliance with the Project as designed and the requirements of the CT DEEP Stormwater Quality Manual.
32. Please provide a list of all projects constructed by GRE or a subsidiary of Greenskies which have had instances of non-compliance with stormwater requirements other than the project located in East Lyme, Connecticut.

### **Membership**

33. Please identify, by name and town, all members of Save the Rivers-Save the Hills, Inc.

34. Please provide a list of all employees, officers and directors of Save the Rivers-Save the Hills, Inc.
35. Please provide copies of all correspondence in the last five years between Save the Rivers-Save the Hills and John Bialowans of East Lyme, Connecticut.
36. Please provide the amount of any donations made by John Bialowans to Save the Rivers-Save the Hills in the last two years.

Respectfully Submitted,  
GRE GACRUX LLC

By: \_\_\_\_\_

Lee D. Hoffman  
Pullman & Comley, LLC  
90 State House Square  
Hartford, CT 06103-3702  
Juris No. 409177  
860-424-4300 (p)  
860-424-4370 (f)  
[lhoffman@pullcom.com](mailto:lhoffman@pullcom.com)  
Its Attorneys