

**STATE OF CONNECTICUT**

**DEPARTMENT OF ENVIRONMENTAL AND ENERGY PROTECTION**

**IN THE MATTER OF:** : **APPLICATION NO:** \_\_\_\_\_  
: :  
**Candlewood Solar, LLC** : :  
**20 MW Solar Photovoltaic Project** : :  
**New Milford Assessor's Map** : :  
**Parcels 26/67.1, 9.6, and 34/31.1** : :  
**Candlewood Mountain Road** : :  
**New Milford, Connecticut** : **FEBRUARY 27, 2020**

**PETITION BY TOWN OF NEW MILFORD FOR DECLARATORY RULING AND FOR  
PARTY STATUS UNDER C.G.S. SECTION 22a-19**

**I. INTRODUCTION.**

The Town of New Milford ("Town") submits this petition pursuant to C.G.S. §§ 4-176, 22a-430b(c), and 22a-19, and R.C.S.A. § 22a-3a-4. The impetus for the petition is the Town's understanding that Candlewood Solar, LLC ("Candlewood Solar") is about to file a new request for authorization of the above project (the "Project") under the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ("General Permit").

The Project will have a massive adverse environmental impact, including clear cutting of 54 acres of core forestland and the disruption of another 29 acres on the top of Candlewood Mountain and its surrounding slopes. The gravamen of the Town's petition is a request that the DEEP Commissioner require Candlewood Solar to submit an individual permit application that will afford the Town a reasonable time to prepare a careful and thorough response to Candlewood Solar's revised stormwater management plan--which Candlewood Solar has taken almost one year to develop. The individual permit process also will trigger a public hearing to allow a robust and open vetting of the

stormwater and erosion-control aspects of the Project and their consequences to the water and other natural resources of the state. By contrast, the regulatory period for public comment on Candlewood Solar's request for authorization under the General Permit is only fifteen (15) days from the date of filing of the request,<sup>1</sup> an extremely narrow and unrealistic window of time to provide meaningful responses to an application of this magnitude.

This petition seeks two forms of relief. The first request is for a declaratory ruling pursuant to C.G.S. §§ 4-176, 22a-430b(c) and R.C.S.A. § 22a-3a-4. The declaratory ruling request itself is in two parts. First, the Town requests a declaratory ruling that the Project should not proceed under a request for authorization under the General Permit. Rather, because of the enormous environmental consequences, risks, and implications of the Project, including the clearcutting of core forestland, the removal and grubbing of over 15,000 trees, the removal of other native vegetation, and the resulting potential for substantial stormwater runoff and erosion during and after construction, the Commissioner should require Candlewood Solar to apply for an individual permit pursuant to her authority under C.G.S. § 22a-430b(c), because an individual permit will better protect the waters of the state from pollution. An individual permit application also will protect associated interests of members of the public and the Town. (See Part II below.)

In the second part of the Town's petition for declaratory ruling, the Town requests that the period for comments by the Town and other interested persons in response to the application for registration under the General Permit and accompanying Stormwater Pollution Control Plan ("SWPCP") be extended to 90 days after either 1) the

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<sup>1</sup> See subsections 4(e)(1)-(2) of DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters From Construction Activities, effective October 1, 2019.

Commissioner rules on the Town's request for a declaratory ruling requiring an individual permit application (assuming that ruling is a denial of the request), or 2) Candlewood Solar files its new request for authorization under the General Permit, whichever date is later. (See Part II below.)

This petition is also brought pursuant to C.G.S. § 22a-19. The Town believes that the Project will or may unreasonably destroy or impair the public trust in the natural resources of the state, and thus seeks to be made a party or intervenor to the above-requested declaratory ruling proceeding as well as to the new application for authorization under the General Permit. (See Part III below.)

**II. Petition for Declaratory Ruling.**

**A. Name and Address of Petitioner and Petitioner's Counsel.**

Town of New Milford  
c/o Hon. Peter Bass, Mayor  
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**B. DEEP's Prior Rejections of Registration Under the General Permit; Candlewood Solar's Imminent Filing of a new Registration Application.**

On December 21, 2017, the Connecticut Siting Council issued a declaratory ruling approving the Project. The Town intervened as a party to the Siting Council proceeding

to raise numerous concerns about the Project. In addition, Rescue Candlewood Mountain (“RCM”), an association of individuals concerned about the destruction of core forest and other environmental impacts to be caused by the Project, intervened in the Siting Council proceeding pursuant to C.G.S. § 22a-19 to oppose the Project due to its significantly adverse effect on the natural resources of the state. RCM and certain other persons adversely affected by the Project timely filed an administrative appeal pursuant to C.G.S. § 4-183 from the Siting Council’s approval (the “RCM Appeal”). A copy of RCM’s verified complaint in the RCM Appeal is attached hereto as Tab A and incorporated by reference. Trial of the RCM Appeal in the Superior Court for the Judicial District of Hartford/New Britain (Cohn, J.) commenced on December 4, 2018, and is ongoing as of the date of this petition. Also attached hereto as Tab B and incorporated by reference herein are RCM’s pre-trial briefs (main and reply) in the RCM Appeal. These briefs outline the significant adverse impacts on the natural resources of the state, including its waters and wetlands, that RCM believes the Project will create. The Town agrees with and shares RCM’s environmental contentions.

The Siting Council’s approval of the Project was conditioned on DEEP’s approval of a SWPCP. On September 17, 2018, Candlewood Solar filed with DEEP an application for registration of the Project under the General Permit (the “First Application”). (See DEEP interoffice memorandum, March 13, 2019, attached as Tab C.)

On October 18, 2018, DEEP rejected the First Application, citing numerous “major” deficiencies in the SWPCP submitted by Candlewood Solar. (Id.)

On or about January 2, 2019, Candlewood Solar filed a second General Permit registration application with DEEP (the "Second Application"). Attached to the Second Application were plans including the following:

- "Stormwater Pollution Control Plan, 20 MW (AC) Solar Photovoltaic Project Candlewood Solar Mountain Road, New Milford, Connecticut, prepared by Wood Environmental & Infrastructure Solution, Inc., dated December 19, 2018" (already defined herein as the "SWPCP").
- Plans entitled "Candlewood Solar, 20 MW (AC) Solar PV Development, Candlewood Mountain, Road, New Milford, Connecticut, For Construction, prepared by Wood Environment & Infrastructure Solutions, Inc., dated December 19, 2018 (26 sheets)" ("Construction Plan").

On January 16, 2019, the Town filed with DEEP a petition for declaratory ruling which requested, in part, that DEEP reject the Second Application. The Town's petition attached a January 14, 2019 affidavit by Milone & MacBroom members Edward Hart, P.E. and Ryan McEvoy, P.E. ("Milone & MacBroom affidavit") (Tab D attached). Milone & MacBroom is a professional engineering, landscape architecture, and environmental science firm with offices in Cheshire, Connecticut. The Milone & MacBroom affidavit set forth numerous and significant inadequacies in the SWPCP and Construction Plan filed with the Second Application. The Milone & MacBroom affiants recommended that DEEP reject the Second Application and require the filing of an application for an individual permit to discharge, due to the magnitude of the proposed solar facility and its location "on steep slopes ... where a significant area of core forest will be removed ...." (Id., ¶ 4)

On March 14, 2019, DEEP's Bureau of Management and Compliance Assurance ("Bureau") rejected the Second Application. (Tab E attached) For detailed reasons including those set forth in the Milone & MacBroom affidavit, the Bureau found substantial flaws in Candlewood Solar's stormwater analysis, and determined that the SWPCP

“lack[s] elements necessary to demonstrate the effectiveness and appropriateness of the proposed construction and post-construction stormwater management measures.”

Also on March 14, 2019, DEEP Commissioner Katie Dykes issued a decision not to grant the Town’s January 16, 2019 request for declaratory ruling. (Tab F attached) Commissioner Dykes’ decision rested on the Bureau’s rejection of the registration under the General Permit in the Second Application. Her decision noted the substantial deficiencies in the Second Application, and expressed doubt that Candlewood Solar would submit a revised registration. As Commissioner Dykes found:

I am also, in this declaratory ruling proceeding, declining to exercise my authority to require that Candlewood Solar obtain an individual discharge permit for the Project, although not for any of the reasons cited in Candlewood Solar’s objections. I recognize that with the rejection of Candlewood Solar’s registration, nothing prevents Candlewood Solar from resubmitting a revised registration seeking coverage under the General Permit. Nevertheless, with the rejection of Candlewood Solar’s registration, there is no longer anything pending before the Department and it remains unclear, especially given the substantial nature and extent of the deficiencies in the last registration it submitted, if Candlewood Solar will make any resubmission – either in the form of a registration or an application for individual permit. Moreover, the Petitioner is seeking a hearing regarding the exercise of my authority under Conn. Gen. Stat. § 22a-430b(c), yet nothing in this section 22a-430b(c) would require that I hold a hearing to exercise the discretion afforded by that statute. I am reluctant to expend limited Department resources on a hearing, especially when section 22a-430b(c) does not require a hearing and when it is not clear whether Candlewood Solar will even submit a revised registration or an application for an individual permit.

Having so concluded, I also want to make unmistakably clear that my decision in this matter does not, and is not intended to, foreclose the possibility that I may indeed exercise my authority under Conn. Gen. Stat. § 22a-430b(c) and require that Candlewood Solar obtain an individual discharge permit for the Project. I remain concerned about a number of the issues raised by the Petitioner and Rescue Candlewood Mountain. I have decided, however, not to exercise this authority in this context, at this time.

(Tab F, pp. 3-4 (footnote omitted (emphasis added)))

On January 28, 2019, Candlewood Solar filed a development and management plan (“DMP”) with the Siting Council. The DMP was based on the same SWPCP that the Bureau later rejected in its March 14, 2019 denial of the Second Application. The Town then requested the Siting Council to deny the DMP on this basis. On April 25, 2019, the Siting Council approved the DMP, but conditioned the approval on Candlewood Solar’s resubmission of a new SWPCP to DEEP and DEEP’s approval of that submission. (Tab G attached.) The Town thereafter filed an administrative appeal from the Siting Council’s approval of the DMP (the “Town Appeal”). That appeal is now pending before Judge Henry Cohn in the Superior Court for the Judicial District of New Britain. (Dkt. No. HHB-CV-19-6053213-S)

In a January 21, 2020 status conference in the Town Appeal, Judge Cohn asked Candlewood Solar’s counsel about its plan to submit a new SWPCP to DEEP. Counsel represented that Candlewood Solar intended to file the new SWPCP as part of a new request for General Permit authorization by February 10, 2020 (the “New Application”). Counsel also reported to the Court that Candlewood Solar had been meeting privately with DEEP staff regarding the planned filing of the New Application. As of the date of this petition, Candlewood Solar has not filed the New Application.

**C. Statutes and Regulations at Issue.**

C.G.S. § 4-176 provides that “[a]ny person” may petition a state agency for a declaratory ruling as to, among other things, “the applicability to specified circumstances of a provision of the general statutes.” R.C.S.A. § 22a-3a-4 sets forth the requirements for a petition for declaratory ruling to the Commissioner of DEEP. This petition seeks a determination that review of the Project under the General Permit otherwise authorized

by C.G.S. 22a-430b is inapplicable to and inappropriate for the highly unusual size and scope of the Project's environmental impacts, and that the Commissioner therefore should invoke her right to require an individual permit application under Section 22a-430b(c). Thus the petition properly requests a declaratory ruling under Section 4-176.

C.G.S. § 22a-430b(c) allows the Commissioner to require any person "initiating, creating, originating or maintaining any discharge which is or may be authorized by a general permit to obtain an individual permit pursuant to [C.G.S.] section 22a-430 if the Commissioner determines that an individual permit would better protect the waters of the state from pollution." (Emphasis added.) (For ease of reference the Town attaches a copy of § 22a-430b as Tab H.) The statute sets forth a non-exclusive list of the circumstances in which the Commissioner may require an individual permit. One of the listed factors is in subdivision (c)(5), which allows the Commissioner to require an individual permit "when circumstances have changed since the issuance of the general permit so that the discharge is no longer appropriately controlled under the general permit." For the reasons stated in the Milone & MacBroom affidavit, and as discussed further below, the Town submits that the General Permit review process is unsuited to review of a development as huge and potentially environmentally disruptive and risky as this. Thus the Project warrants the Commissioner's decision to require an individual permit application under § 22a-430b(c)(5).

Section 22a-430b(c) also provides that "[a]ny interested person or municipality may petition the Commissioner to take action under this subsection." This provision provides independent authorization for this petition.

Significantly, nothing in § 22a-430b(c) provides that the Commissioner may exercise her authority to require an individual permit only after the filing of a request for authorization under a general permit. Nor does C.G.S. § 4-176 state that a person may file a petition for a declaratory ruling only in response to an application filed by another person before the agency. Accordingly, the fact that, as of the date of this petition, Candlewood Solar has not yet filed its New Application, is no bar to the Commissioner's consideration and ruling on the petition, especially when Candlewood Solar's attorneys have represented to the Superior Court that the New Application will be filed imminently.

**D. Bases for Declaratory Ruling Request.**

As the Milone & MacBroom affidavit indicated, their review of the SWPCP and Construction Plan submitted with the Second Application revealed that they were deficient in numerous respects, and "lack the necessary information to assure that there will not be erosion and sedimentation caused by the [Project's] construction activities that could impact the waters of the state." (Milone & MacBroom affidavit, ¶ 11) The affidavit notes that "disturbing 83 acres of steep woodland is an unusual phenomenon in Connecticut, something that was probably not contemplated when the SWGP general permit regulations were adopted." (*Id.*) Moreover, it is undisputed that the Project is located up-gradient of nearby wetlands, Rocky River, Candlewood Lake, and the Housatonic River. In the affiants' professional judgment, it would be appropriate and prudent in these unusual circumstances for the Commissioner to determine that an individual permit application is necessary in order to allow for a more extensive review of the plans by DEEP, the Town, the Town's consultants, RCM, and other interested persons.

DEEP itself recently recognized the unique and harmful consequences and risks of runoff and erosion caused by constructing a large solar project on steep slopes involving substantial removal of native vegetation. Appendix I to the General Permit, issued on or about August 19, 2019, is entitled “Stormwater Management at Solar Array Construction Projects.” (Tab I attached.) This document imposes numerous new and detailed conditions on solar projects, including limits on constructing panels on slopes above certain grades, runoff limitations, minimum buffers between arrays and wetlands, requirements for re-vegetation below and between the panels, phasing and sequencing of the project, and post-construction design requirements. This document is compelling proof that solar projects such as the one at issue here involve discharges that the Commissioner may readily determine are “no longer appropriately controlled under the general permit.” C.G.S. § 22a-430b(c)(5).

Accordingly, the Town respectfully submits that an individual permit application will better protect the waters of the state. Moreover, given the scale of environmental disruption and risks to be caused by the Project, the more public review required in an individual permit application is warranted in the interest of fundamental fairness to the Town and other persons who may be adversely affected by the Project.

Pursuant to R.C.S.A. § 22a-3a-4(c)(4), the Town further requests the Commissioner to hold a hearing on the Town’s petition for a declaratory ruling. In a project of this magnitude and with such critical potential adverse impacts and risks to the waters of the state, a hearing is necessary and appropriate to allow interested persons sufficient opportunity to participate in this process and to ensure the completeness and transparency of DEEP’s review. A hearing is particularly warranted in view of the fact

that Candlewood Solar's attorneys have represented in open court that their client has been meeting privately with DEEP staff on issues that will impact far more interests than those represented by Candlewood Solar.

In any event, and for the same reasons, the Town requests a declaratory ruling to extend the time period for public and municipal comment on the New Application until either 90 days after the Commissioner rules on whether to require an individual permit as requested above (i.e. to the extent the Commissioner decides an individual permit is not required), or in the alternative, until 90 days from the date the New Application is filed with DEEP, whichever date is later. Candlewood Solar has taken almost one year to formulate the New Application, during which time it has privately submitted and obtained comment from DEEP staff on its revised SWPCP. In these circumstances it would be manifestly unfair and prejudicial to all interested parties other than Candlewood Solar to restrict the period for the Town and members of the public to comment on the New Application to 15 days from the date of its electronic filing with DEEP (i.e. without publication or other public notice).

Accompanying this petition, as required by R.C.S.A. § 22a-3a-4(a)(3), is an affidavit by undersigned counsel for the Town that the Town has given notice of the substance of the petition, and of the opportunity to file comments and to request intervenor or party status under subdivision (c)(1) of R.C.S.A. § 22a-3a-4, to all persons known by the Town to have an interest in the subject matter of the petition.

**III. Request for Party/Intervenor Status Under C.G.S. § 22a-19.**

Pursuant to C.G.S. § 22a-19, any political subdivision may intervene as a party in a state administrative proceeding based on facts alleged in a verified pleading that the

proposed activity at issue has, or is reasonably likely to have, the effect of unreasonably polluting, impairing, or destroying the public trust in the air, water, or natural resources of the state. The Town seeks party status under § 22a-19 in the proceedings on the declaratory ruling requested in Part I above. In the event that DEEP moves forward with the New Application under either the General Permit or individual permit procedures, the Town also seeks § 22a-19 party status in that proceeding. The verification by Peter Bass, the Town's Mayor, of the facts alleged and referred to herein is appended to this petition.

The Town has a direct interest in the proceedings because it has a duty to protect the public interests of its residents by preventing unreasonable impacts to the natural resources of the state located in New Milford. The Town seeks party status to protect the waters of the state which will or may be impacted by the Project.

The Town again incorporates by reference the Milone & MacBroom affidavit as well as the portions of the briefs in the RCM Appeal dealing with the adverse effects of the Project pertaining to erosion and sedimentation from the construction and maintenance of the solar array, as well as impacts to wetlands, vernal pools and associated critical terrestrial habitats of indicator species dependent on those habitats for survival. (Tab D)

As the Milone & MacBroom affidavit demonstrates, the SWPCP and Construction Plan already rejected by DEEP in its denial of the Second Application are wholly inadequate and do not provide assurance that the Project will not cause erosion and sedimentation. Given the facts that Candlewood Solar has taken almost a year to develop revised plans after DEEP denied the Second Application, and that DEEP has imposed during this period detailed new conditions for the construction of solar projects (see page

10 above), it seems highly questionable whether the New Application will fully and completely address the deficiencies in the prior submissions. The Town seeks § 22a-19 party status to give it the opportunity to introduce expert testimony and other evidence as outlined above as to whether the SWPCP and Construction Plan in the New Application will effectively control runoff, sediment and erosion from the Project site, or whether they will jeopardize on-site and off-site wetlands, vernal pools, and critical terrestrial habitats, as well as provide inadequate protection to downgradient properties and watercourses.

The bar is quite low for filing an intervention petition, and thus § 22a-19 applications should not be lightly rejected. Finley v. Town of Orange, 289 Conn. 12 (2008) (an application need only allege a colorable claim to survive a motion to dismiss), citing Windels v. Environmental Protection Commission, 284 Conn. 268 (2007).

CEPA clearly and in broad terms indicates that any legal entity may intervene in any administrative proceeding. This includes a municipality and officials. Avalon Bay Communities v. Zoning Commission, 87 Conn. App. 537 (2005).

An allegation of facts that the proposed activity at issue in the proceeding is likely to unreasonably impair the public trust in natural resources of the state is sufficient. See Cannata v. Dept. of Environmental Protection, 239 Conn. 124 (1996) (alleging harm to floodplain forest resources).

The Connecticut Appellate Court has noted that statutes “such as the EPA are remedial in nature and should be liberally construed to accomplish their purposes.” Avalon Bay Communities, Inc. v. Zoning Commission of the Town of Stratford, 87 Conn. App. 537 (2005); Keeney v. Fairfield Resources, Inc., 41 Conn. App. 120, 132-33 (1996). In Red Hill Coalition, Inc. v. Town Planning & Zoning Commission, 212 Conn. 727, 734

(1989) the Supreme Court held that “section 22a-19[a] makes intervention a matter of right once a verified pleading is filed complying with the statute, whether or not those allegations ultimately prove to be unfounded.” See Polymer Resources, Ltd. v. Keeney, 32 Conn. App. 340 (1993) (“[Section] 22a-19[a] compels a trial court to permit intervention in an administrative proceeding or judicial review of such a proceeding by a party seeking to raise environmental issues upon the filing of a verified complaint. The statute is therefore not discretionary.”). See also Connecticut Fund for the Environment, Inc. v. Stamford, 192 Conn. 247, 248 n.2 (1984).

The rights conveyed by CEPA are so important and fundamental to matters of public trust that the denial of a 22a-19 intervention itself is appealable. See CT Post Limited Partnership v. New Haven City Planning Commission, 2000 WL 1161131 Conn. Super. (Hodgson, J. 2000) (§ 22a-19 intervenors may file an original appeal for improper denial of intervenor status).

The Town’s application for party status should be granted so that it may participate by presenting evidence and otherwise meaningfully assist the Commissioner in reviewing the New Application and reaching a decision which minimizes the Project’s impact to the natural resources of the state.

#### **IV. Conclusion.**

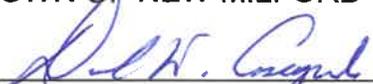
For the foregoing reasons, the Town respectfully requests the Commissioner to issue the declaratory rulings as discussed in Part II above, and to grant the Town’s request for party status under § 22a-19 as discussed in Part III above. The Town respectfully submits that it is fair and appropriate for the Commissioner to decide the Town’s declaratory ruling petition without waiting for Candlewood Solar’s formal re-

submission of its General Permit authorization request. It is undisputed that the Project will result in the destruction of 54 acres of core forest, a critical natural resource of the state, on property of undisputed environmental sensitivity. Candlewood Solar's new filing will not change this core fact. The Town's engineers, DEEP staff and the Commissioner have acknowledged the environmental risks posed by the Project as well as the substantial defects in Candlewood Solar's prior submissions. An individual permit is warranted given the size and scale of the Project's environmental disruption and to ensure a thorough and transparent agency review. An early ruling by the Commissioner to either require an individual permit or provide a reasonable extension of the public comment period will provide fair notice to Candlewood Solar, the Town and other stakeholders as to how to proceed in litigating a project of such important public concern.

Dated: February 27, 2020  
New Milford, Connecticut

TOWN OF NEW MILFORD

By:

  
\_\_\_\_\_  
Daniel E. Casagrande, Esq.  
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**VERIFICATION**

The undersigned, Peter Bass, duly authorized Mayor of the Town of New Milford, duly sworn, hereby verifies that the above petition is true and accurate to the best of his knowledge and belief.



\_\_\_\_\_  
Peter Bass

Subscribed and sworn to before me this 27<sup>th</sup> day of February, 2020.



\_\_\_\_\_  
Notary Public

My Commission Expires: 3/31/2022



**AFFIDAVIT REGARDING NOTICE**

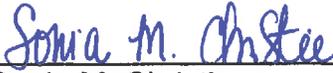
Daniel E. Casagrande, being duly sworn, deposes and says:

1. I am over the age of eighteen and believe in the obligations of an oath.
2. I am counsel for the petitioner, Town of New Milford, and am fully familiar with the facts set forth herein.
3. On February 28, 2020, the petitioner, through undersigned counsel, gave notice of the substance of the petition, and of the opportunity to file comments and to request intervenor or party status under R.C.S.A. § 22a-3a-4 (c)(1), to all persons known by the petitioner to have an interest in the subject matter of the petition. Such notice was served, via first-class mail, upon the parties listed on the attached list.

Dated at Danbury, Connecticut, this 28<sup>th</sup> day of February, 2020.

  
\_\_\_\_\_  
Daniel E. Casagrande

Subscribed and sworn to before me this 28<sup>th</sup> day of February, 2020.

  
\_\_\_\_\_  
Sonia M. Christie  
Notary Public  
My Commission Expires: 12/31/2021

## INTERESTED PARTIES

Candlewood Solar, LLC  
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Framingham, MA 01701

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Housatonic Valley Association  
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Cornwall Bridge, CT 06754

Jeffrey J. Mirman, Esq.  
Hinckley Allen & Snyder, LLP  
20 Church Street  
Hartford, CT 06103

## NOTICE

Notice is hereby given to persons who have an interest in the subject matter of the following proceeding:

1. The Petitioner has filed the enclosed Petition for Declaratory Ruling dated February 27, 2020 with the Department of Energy & Environmental Protection (excluding attachments). The Petition seeks a declaratory ruling that, among other things, Candlewood Solar, LLC, the developer of a solar energy project to be located off of Candlewood Mountain Road in New Milford, should be required by the Commissioner of DEEP to file an individual permit request for permission to discharge stormwater and other wastewater dewatering activities associated with the construction of the project. The attachments to the Petition will be provided by undersigned counsel upon request.

2. You will have the opportunity to file comments with the Commissioner at the following address:

Katie Dykes, Commissioner  
Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

3. You have the right to request party or intervenor status from the Commissioner.

TOWN OF NEW MILFORD

By: 

\_\_\_\_\_  
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