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July 10, 2024

Via E-Mail and Hand Delivery

Melanie Bachman
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: GREENSKIES CLEAN ENERGY LLC APPLICATION FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, OPERATION AND MAINTENANCE OF A 4.625 MW AC GROUND-MOUNTED SOLAR PHOTOVOLTAIC PROJECT AT FAWN MEADOW LANE, WOODBURY, CONNECTICUT

Dear Ms. Bachman:

I am writing on behalf of my client, Greenskies Clean Energy, LLC, which is submitting the enclosed Application for a Certificate for a facility to be located in Woodbury, Connecticut. With this letter, I am enclosing an original and 15 copies of the Application and a check for \$25,000 for public participation costs. A check for the application fee will be filed under separate cover.


In addition, I am including the “Bulk” filing, of which two hard copies will be delivered along with the copies of the Application to your office. This consists of: Zoning Regulations, Inland Wetlands & Watercourse Regulations, and the current Plan of Conservation and Development. A copy of the original application package to the towns of Woodbury and Bethlehem is also included. A copy of all materials is located at: https://vhb-my.sharepoint.com/personal/skochis_vhb_com/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fskochis%5Fvhb%5Fcom%2FDocuments%2FDesktop%2FRadiant%20Meadows%20CSC%20Certificate%20Application&ga=1.

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that a copy of the Application has been provided to the Towns of Woodbury and Bethlehem.

Sincerely,

Lee D. Hoffman

Enclosures



**Application by Greenskies Clean Energy LLC for a
Certificate of Environmental Compatibility and Public
Need, Pursuant to Connecticut General Statutes § 4-176
and § 16-50k, for the Proposed Construction, Operation
and Maintenance of a 4.625 MW AC Ground-mounted
Solar Photovoltaic Electric Facility Located at Fawn
Meadow Lane, Woodbury, Connecticut**

**Prepared for
The Connecticut Siting Council**

July 10, 2024

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1. Introduction

This is an Application for a Certificate of Environmental Compatibility and Public Need (“Certificate”) for the development, construction, operation and maintenance of a proposed solar photovoltaic project (the “Project”) proposed by Greenskies Clean Energy LLC (“GCE” or “Applicant”) in the Town of Woodbury, Connecticut. The Project consists of the development of a 4.625-megawatt (“MW”) alternating current (“AC”) ground-mounted solar photovoltaic (“PV”) system (“Facility”) located at Fawn Meadow Lane, Woodbury, Connecticut (“Property”). See Figure 1 – Site Location Map and Figure 2 – Proposed Project Areas Aerial.

GCE submitted the Project in response to a renewable energy RFP and was selected as one of the projects approved in that RFP process. The 4.625 megawatt solar array will be part of the Non-Residential Renewable Energy Solutions (“NRES”) Projects. The Facility has been designated #LZ2 – ESRES-00239. This shared use would promote agricultural activities and renewable energy, specifically increased generation from renewable energy resources and diversification of the State’s renewable energy portfolio. The Tariff Terms Agreement Approval Date or In-Service Date for this portion of the Project is July 19, 2026.

Authorization by the Connecticut Siting Council (“Council”) via approval of this Application would allow Applicant to construct the Project and assist the State of Connecticut in achieving its goal of energy conservation and sustainability. Pending approvals, the Project will commence financing, detailed engineering, procurement, and construction efforts in 2024, with commercial operation planned for the entire Project in 2025.

The Project is proposed on one parcel within the Town of Woodbury’s Open Space Residence District 100 and would occupy approximately 19 acres of a 36.87-acre parcel (“Project Area”). See Figure 3 – Zoning Map. The Town of Woodbury’s Assessor’s Office has the parcel listed as 029-018D and the parcel is currently owned by Trofa Enterprises. See Figure 4 – Tax Parcel Map and Figure 5 – Site Survey.

1.A Authority and Purpose

Pursuant to Conn. Gen. Stat. §§ 4-176(a) and 16-50k and Regs. Conn. State Agencies § 16-50j-38 *et seq.*, Applicant hereby submits this Application for a Certificate of Environmental Compatibility and Public Need for the proposed construction, operation and maintenance of the Applicant's proposed installation and development of a 4.625-megawatt ("MW") alternating current ("AC") ground-mounted solar photovoltaic ("PV") system located at Fawn Meadow Lane, Woodbury, Connecticut.

Conn. Gen. Stat § 16-50k(a) states, in relevant part:

Except as provided in subsection (b) of section 16-50z, no person shall exercise any right of eminent domain in contemplation of, commence the preparation of the site for, commence the construction or supplying of a facility, or commence any modification of a facility, that may, as determined by the council, have a substantial adverse environmental effect in the state without having first obtained a certificate of environmental compatibility and public need, hereinafter referred to as a "certificate", issued with respect to such facility or modification by the council. Any facility with respect to which a certificate is required shall thereafter be built, maintained and operated in conformity with such certificate and any terms, limitations or conditions contained therein. Notwithstanding the provisions of this chapter or title 16a, the council shall, in the exercise of its jurisdiction over the siting of generating facilities, approve by declaratory ruling (A) the construction of a facility solely for the purpose of generating electricity, (B) the construction or location of any fuel cell, unless the council finds a substantial adverse environmental effect, or of any customer side distributed resources project or facility or grid-side distributed resources project or facility with a capacity of not more than sixty-five megawatts, as long as such project meets air and water quality standards of the Department of Energy and Environmental Protection, and (C) the siting of temporary generation solicited by the Public Utilities Regulatory Authority pursuant to section 16-19ss.

Conn. Gen. Stat § 16-50k(a). In accordance with this provision, GCE respectfully requests that the Council issue this Project a Certificate.

2. Legal Name, Background and Address of Applicant

GCE is a limited liability company with offices at 127 Washington Ave, North Haven, CT 06473. GCE is a fully integrated development platform that develops, finances, designs, constructs, owns, operates, and maintains clean, renewable-energy projects throughout the United States. In conjunction with its affiliate, Clean Focus Yield, GCE offers integrated solar and battery-storage solutions to commercial and industrial (“C&I”), municipal, and utility customers. From beginning to end – origination through construction and then lifetime operation – customers work with a single delivery team. GCE focuses on delivering clean energy, peak performance, and maximum energy savings. Since 2009, GCE and other affiliates of Greenskies have constructed and are operating over 310 MW of C&I solar projects throughout the country. The power generated by the portfolio is sold under long-term contracts that are typically 20 years, and the majority of the buyers have investment-grade credit ratings.

GCE has developed, owns and operates other large-scale ground-mount projects in Connecticut, including but not limited to, a 16.78 MW AC facility in Waterford, a 5 MW AC facility in North Haven, a 5 MW AC facility in Stonington, a 5 MW AC facility in East Lyme, a 5 MW AC facility in North Stonington, and a < 1 MW AC system at the East Haven Landfill. As the Council is aware, GCE has other projects under construction in Connecticut. GCE’s commercial clients include Target Corporation, Walmart, Inc., and Amazon.com, Inc., and our projects with them represent 136 MW across 276 sites in 16 states. According to the Solar Energy Industry Association, Target, Walmart, and Amazon are in the top six solar users at US-based facilities as of 2022¹. GCE is the partner of choice for large corporations and owners of real estate seeking to take a company- or portfolio-wide approach to solar energy adoption, and GCE is consistently ranked as one of the top solar developers in the United States.

¹ See, <https://www.seia.org/news/solarmeansbusiness2022>

As a vertically-integrated company, GCE manages every step of the solar development and implementation process. From project origination to design and engineering to construction and, ultimately, operation and maintenance, GCE brings years of industry knowledge and expertise at every level. Moreover, with hands-on management of on-site performance and sophisticated reporting processes in place, both during construction and operation and maintenance, the company is able to ensure safety, quality control and optimal electrical generation throughout the life of each project.

Correspondence and communications regarding this Application should be addressed to both of the following individuals:

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Project Developer

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North Haven, CT 06473

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3. Project Description

The Project site is located on a 36.87-acre parcel at Fawn Meadow Lane, Woodbury, Connecticut (“Project Area”). The Town of Woodbury Assessor Office has the parcel listed as 029-018D Currently owned by Trofa Enterprises. See Figure 4 – Tax Parcel Map. The overall land use of the parcel/Property consists of a cleared grass field surrounded by woods, with a gravel access path to connect the site with Fawn Meadow Lane. There is a stream and wetland area off the property to the eastern and western edges respectively. The parcel is largely undeveloped except for the created access path. See Figure 5 – Existing Conditions Map.

3.A Site Selection

GCE conducted an extensive search of both public and private land, resulting in the selection of the Property. GCE uses third party consultants combined with site visits, thorough internal analysis and minimal impact requirements, and review of public data for environmental classifications/hazards to understand the biological, environmental, historical, and archeological impacts of solar development on selected sites. While all development has an impact on the area and community, the social and environmental impacts of this Project are a net positive.

The Project Area was selected by GCE because it was suitable for a solar PV project and would have minimal natural resource and environmental impacts. The Project as designed will not have adverse effects on quality forested areas, agricultural land, or the designated wetlands, and the Project will not diminish the quality of life of those who live in the vicinity. It was also important to GCE to select a site that allows interconnection of the generation facility to a feeder and substation of the utility company that is compatible with its grid and goal of better serving customers. The proposed Project Area allows for interconnection to the Eversource distribution grid at a cost that is viable and avoids long term studies or any negative impacts to the electrical grid. Every attempt is made to minimize adverse effects of development on the land.

3.B Project Description

The current PV array on the site plan has a nameplate capacity of 4.625 MW AC and is designed with 381 strings of 26 modules, for a total of 9,906 modules with 6.5ft aisle width between rows. There would be 37 125kW inverters that are to be centralized within the array and mounted to or adjacent to the racking structure. The DC capacity is 5.349 MW and the AC capacity is 4.625 MW. The DC to AC ratio is designed as 1.16. The power from the inverters would be directed to a transformer, meter, disconnects and switchgear prior to interconnecting with utility distribution feeder. The power will interconnect to the equipment pad to the south of the access road at Fawn Meadow Lane as shown on the electrical plans. The Project would install a 7-foot high chain link fence around the perimeter of the solar array fields to provide site security, as well as to address National Electric Code requirements. The perimeter fencing would extend around each array. There would be three access gates, with locking hardware, proposed along the perimeter for access to the array and permanent stormwater basins. See Appendix A.

Trofa Enterprises purchased the Property in 2003. Imagery suggests that farming operations largely ended in the early-2000s. The Project Area has since been left largely alone, although the field is cut once a year for hay farming, and the landowner has taken steps to prepare the area for a residential development. Trofa Enterprises sought to supplement their income by selling or developing a portion of their land, initially pursuing a residential development. As they sought to supplement their income, the most appealing option would come in the form of converting a portion to allow solar panels to be placed on their property. Trofa Enterprises has expressed no interest in converting the land into exclusively farmland. Rather they have emphasized that they will pursue a residential development should a solar project fall through. Developing a solar farm on the site would allow Trofa Enterprises to retain ownership of the Property while generating a supplemental source of income through a lease agreement with GCE.

GCE has explored opportunities to continue and expand farming activities on this Property. While GCE was unable to get the endorsement of the Connecticut Department of Agriculture on proposed agricultural activities, this was not due to any opposition from GCE to farming activities. In fact, GCE created an advanced agricultural co-use plan and

provided to the Department of Agriculture for review. However, in order to gain the endorsement of the Department of Agriculture, GCE had to submit to requirements that were overly burdensome and more administrative, rather than substantively agricultural, and GCE opted to not obtain the Department of Agriculture's approval for this Application. GCE is willing to work with a farmer to ensure that the soils are protected, used for agricultural purposes during the solar project operations, and that the land is preserved for future agriculture use once the Project is decommissioned. The proper conditions for agricultural practices will be maintained. While GCE does anticipate a reduction in acreage used for agricultural uses, the installation of the Project would actually result in an increase in total agricultural output as the land is currently farmed only once per year, and the Project, as proposed, would result in greater agricultural use as well as improvement of soil health.

According to the Town of Woodbury's Zoning Map, the principal use of the parcel is designated for residential and located in Open Space Residence District 100. There is currently limited farming activity on the Property. Access to the Property will be through the access road attached to Fawn Meadow Lane. All construction, maintenance, and all other activities related to the Project Area will use the access road. The Open Space Residence zone of Woodbury is characterized by agricultural uses, and low-density housing. The zone allows for certain uses to be permitted via a special permit. Some of the uses requiring a special permit are Hospitals, Aircraft Landing Fields Commercial Kennels, Child Day Care Centers, Public Utility buildings, and Extraction/Earth Removal. Applicant believes that the proposed Project falls within the intensity of the uses allowed with a special permit in Open Space Residence District 100 of Woodbury.

This area of Woodbury, which is six miles north of the center of town, is split between residential properties and farms along Fawn Meadow Lane, Orchard Avenue, and Church Hill Road, interspersed with heavily wooded areas. The Project site sits on a secluded access road connecting to Fawn Meadow Lane, nestled against a hill and surrounded by woods. To the immediate East and North of the Project is an open space owned by the Fawn Meadow Estates Homeowners Association and houses line Fawn Meadow Lane, and Orchard Avenue up to the Watertown Fire District Pumping on Nonnewaug River. To the North is Pondview Farm and Little Farm. These farms are nearby the Transfer

Station, Bethlehem Mini Storage, an Auto Repair Shop and other light industrial services. To the South and West, more homes line Church Hill and Cowles Road up to the Flanders Nature Center and Land Trust. The proposed Project fits well within this transitional section of town, being a melding of energy generation, agricultural production, and light commercial use.

The primary access point to the Project will be via a gravel access road at the Southeast corner of the parcel abutting the street from Fawn Meadow Lane Road. A proposed gravel access road would extend from the already existing road to the portion of the Property where the solar array is proposed. Applicant would construct an approximately 2080 linear foot internal gravel roadway within the Project Area to provide centralized access to the proposed solar array, electrical equipment, and temporary sediment traps. Applicant proposes the construction of the roadway on prepared subgrades with a gravel topping which would match existing grades to the greatest extent feasible. Applicant also proposes to construct approximately 240 linear feet of paved road with a hammerhead for vehicular turnaround to act as a terminus of Fawn Meadow Lane on behalf of the Town.

3.C Interconnection

The interconnection application for the solar array was submitted to Eversource Energy on August 17, 2023. The proposed Project is proposed to interconnect with the Carmel Hill 11S Substation via the Carmel Hill 11S14 23kV feeder and is approximately 9.93 miles from the solar project. The point of interconnection will be at an underground feeder on the southern side of the parcel along Fawn Meadow Lane as shown in the electrical plans. See, Appendix B.

Eversource is currently conducting a Facility Study that is expected to be completed at the end of August 2024. Applicant is anticipating to receive an Interconnection Agreement in Q4 of 2024.

3.D Operations and Management

GCE has a dedicated O&M team that currently monitors and maintains all operational assets in the GCE portfolio. This team would manage the efficient operation of the Project

after it is turned on and the construction is complete. A team of individuals including system analysts and field operators would monitor the system 24 hours a day, 7 days a week. The operation center utilizes Also Energy's platform for site monitoring and generation reporting, along with a custom-built in-house platform designed for improved site analytics. Custom alarm management provides instantaneous notifications. System performance analytics would be completed weekly to better understand the health of each asset and find trends in under producing systems. See Appendix C – Operations & Maintenance Plan.

4. Project Benefits and Public Need

The Project is anticipated to provide multiple benefits to the Town of Woodbury, the State of Connecticut, and the rest of New England. As the Council is aware, the State of Connecticut aims to meet specific clean energy goals that this Project helps support. Solar projects supply renewable energy that helps reduce greenhouse gas emissions, supports regional habitat conservation, promotes energy independence, and supports a robust and reliable grid.

High levels of greenhouse gas emissions have been linked to changes in the climate, as well as health risks for the population. The resulting climate change alters regional and nation-wide habitat and threatens our natural resources. The Project is able to produce energy in a way which sheds significantly fewer greenhouse gases than fossil fuel generation over the course of the Project's lifetime. With fewer harmful emissions, this Project is also able to help mitigate the health risks people face by smog and similar poor air quality conditions. Further, leaving behind a need for fossil fuel generation directly corresponds to an ability for National energy independence. Reducing the need to purchase fuel from foreign countries enables the United States to keep more financial capital within the country.

The Project's energy generation will also align with Connecticut's seasonal and time of day peak energy needs. Given that the Project will produce energy during the day when power is generally consumed, it is anticipated that it will have benefits that the Council has recognized pursuant to Conn. Gen. Stat. § 16-50p. The timing of this generation can help the grid support changes in the loading of the system and thus supports a more

robust grid. The ability of this solar project to generate electricity in a de-centralized way means that the grid can support customers more reliably during day-to-day and emergency circumstances.

The Project has received a 20-year PPA through the Non-residential Renewable Energy Solutions) (“NRES”) program. This further demonstrates that the State has evaluated the Project and has determined that the Project will help to satisfy the State’s need to meet its clean energy and zero-carbon goals.

5. Public Outreach

GCE has been in communication with and has engaged state and local regulators regarding the design and development of the Project.

On April 1st, 2024 GCE transmitted a letter to the Connecticut Department of Agriculture stating GCE’s intent to develop the proposed Project on Prime Farmland soils, and requesting a letter confirming no material affect to prime farmland soils. This letter proposed various agricultural co-uses that could be maintained at the Project site consistent with previous uses GCE has submitted that were accepted by the Department of Agriculture including Connecticut Siting Council Petitions No. 1608 and No. 1597. On Monday April 8th, GCE was informed that the Connecticut Department of Agriculture had updated its submission requirements to apply for a letter stating no material affect to prime farmland soils. After reviewing these new requirements, GCE concluded that the barrier to entry they imposed was too high to request a letter of no material effect on prime farmland soils from the Department of Agriculture. Despite this, GCE intends to pursue farming on the site. In an effort to maintain consistency with previously approved agricultural co-uses, GCE intends to pursue an agricultural co-use of planting perennial cold season grasses along with a mix of natural dye plants, pollinator friendly flowers, and nitrogen fixing plants. A copy of GCE’s correspondence and proposed agricultural use is available in Appendix L.

On April 12, 2024, GCE submitted the proposed Project into the CT Department of Energy and Environmental Protection (“DEEP”) Bureau of Natural Resources Division of

Forestry for analysis that there would be no impact to Core Forest. On April 16, 2024, a letter was sent to the Council from the DEEP Bureau of Natural Resources Forestry Division that confirmed the Project would not materially affect the status of core forest. A copy of that letter is available in Appendix K.

On October 8th, 2023, Applicant received final determination from the CT DEEP Bureau of Natural Resources Wildlife Division that populations of the Eastern Hognose Snake, which is a species of Special Concern has been documented within the Project Area. To avoid negative impacts to this species, Applicant has been provided with Best Management Practices in the Project's Final Determination to fulfill the Endangered and Threatened Species requirements for State-issued permit applications, licenses, registration submissions, and authorizations. A copy of the Final Determination is available in Appendix H.

On May 2nd 2024, GCE called the First Selectmen of Towns of Woodbury and Bethlehem notifying them of our intent to submit the proposed Project to the Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need, that they could expect a letter to that effect along with electronic mail the following day, and offering to present in person on the subject. On May 3rd, 2024, GCE sent letters and electronic mail to the offices of both First Selectmen along with a draft of the Certificate Application both in hard copy and through a shared virtual link. On May 6th, the Selectman of Woodbury responded and invited GCE to present to Town officials on the Project. GCE agreed, and presented on the project at 10:00 AM on May 20th, 2024 to a number of Woodbury officials including the First Selectman, the Town Planner, and the Fire Marshal. The officials requested GCE make the following alterations to the proposed Project:

1. Review the feasibility of installing a turnaround where Fawn Meadow Lane meets the property.
2. Reviewing screening options on the western side where proposed tree clearing would take place.
3. The Fire Marshal requested inclusion of a Knox Box to assist in their rapid response to fire/emergency calls.

4. The town requested that GCE install the interconnection point and line underground.
5. Inclusion of effective and layered noise attenuation measures to minimize if not avoid operational noises of the equipment
6. Ensure exterior lighting be fixed, full-cutoff features of a low Kelvin temperature (3,000 K or less) and operated by timers and motion sensors.
7. That GCE compare their wetland delineation map with an older map from 2004.

After the meeting, GCE followed up with the town of Woodbury to ensure the Town's requests were properly captured, and corresponded via email to get clarification. On June 24, GCE submitted an updated site plan of the proposed Project incorporating all of Woodbury's requests along with a letter outlining how each concern had been addressed. The letter can be found in Appendix O.

More recently, on June 27, 2024, GCE sent letters to each abutter of the Property, informing them of GCE's intent to file this Application with the Council. In addition, on June 27 and July 2, 2024, GCE filed a legal notice regarding this Project and Application in The New London Day, a newspaper of general circulation in the area. Copies of all written public outreach are contained in Appendix O.

6. Project will not cause adverse environmental effects

6.A Natural Environment and Ecological Benefits

The site consists of approximately 19 acres proposed to be developed on an overall parcel of land, which lies in a residential zone. The overall land use of the parcel/Property is hay field, and has been owned by Trofa Enterprises prior to the inception of the Project.

The Project intends to minimize impact to the existing land and grade, outside of excavation for temporary sediment traps. Minimal tree clearing is proposed as part of the project and has been reduced to only a small portion of temporary clearing in the west for installation of the temporary sediment trap through consultations with the Town of Woodbury. Thus, the current native woodland perimeter will provide screening to any residences in the vicinity of the Project, specifically the subdivision to the east. In

addition, a pollinator-friendly seed mix will be used on the perimeter of the Project Area, which will support native pollinators and attract pollinators to crops that will be growing in the interspacing of the solar modules.

6.B Public Health and Safety

The proposed Project is not expected to create any adverse impact with regard to public health or safety issues. The proposed Project will meet or exceed all local, state, national and industry health and safety standards and requirements. During construction and post-construction operations and maintenance, workers and personnel would follow all health and safety standards applicable to solar energy generating facilities.

A site-specific construction health and safety plan is typically developed prior to initiation of any on-site Project-related tasks. During the construction phase of development, all contractors, sub-contractors and personnel will be appropriately trained and briefed on any potential site health and safety issues. There will be a designated construction manager and/or site safety officer or representative present at all times during construction, and such individuals will be responsible for overseeing/implementing the site construction health and safety plan.

Construction traffic relative to the site includes standard construction trucks, small earth moving equipment, and all-terrain forklift equipment. Vehicle trips would be relative to scheduled deliveries of the major materials such as solar racking, solar panels, electrical equipment to serve the solar site, and fencing materials to be installed around the perimeter of the solar field. Construction activity and associated traffic would generally take place from 7:00 AM to 5:00 PM daily Monday through Fridays. Notice will be provided to the Council in the event that Saturday work is planned.

Potential pollutants that might be used on the site would include polyvinyl chloride (“PVC”) glue for use with electrical conduit installations and carbon-based fuels for vehicles and equipment. Applicant anticipates that there will be less than one gallon of PVC glue and less than 25 gallons of fuel stored on-site. Applicant would keep all flammable liquids in code compliant cabinets and containers. Applicant would also keep spill kits in all vehicles and equipment on-site. Applicant would monitor chemical usage

daily to ensure compliance to requirements. No risk of release to the environment is anticipated.

6.C Air Quality

Because the Project is a solar energy generating facility, no air emissions will be generated during operations and, therefore, an air permit would not be required. Temporary, potential, construction-related mobile source emissions would include those associated with construction vehicles and equipment. Any potential air quality impacts related to construction activities can be considered *de minimis*. Such emissions would be mitigated using available measures including limiting idling times of equipment; proper maintenance of all vehicles and equipment and watering/spraying to minimize dust and particulate releases. In addition, all on-site and off-road equipment would meet the latest standards for diesel emissions, as prescribed by the United States Environmental Protection Agency (USEPA) and, with the above mitigation measures, should reduce the exhaust emissions.

6.D Scenic and Recreational Values

The site is not located in close proximity to any publicly used spaces, such as parks, trails or ballfields. The closest residential area to the site is a subdivision to the east, and the neighborhood to the south. In either case the existing tree line that is not proposed to be disturbed will provide appropriate screening, presumably even during leaf-off seasons due to the density. A visual cross section was prepared for the single property closest to the edge of the development area and is attached as Exhibit I.

6.E Historic and Archaeological Resources

A Phase 1A environmental site assessment dated September 2023, prepared by Heritage Consultants, was submitted to the State Historic Preservation Office (“SHPO”) for review. The results of the Phase 1A study concluded that the 23+ acres of the reviewed site contained a moderate/high sensitivity for archaeological resources and recommended a Phase 1B study be performed. A Phase 1B cultural resource reconnaissance survey, dated March 2024, was submitted to SHPO for review. The results of the Phase 1B study

concluded no specific findings of cultural significance and therefore determined no further archaeological examination was necessary.

6.F Habitat and Wildlife

An application was submitted to CTDEEP Wildlife Division, Natural Diversity Database, on October 8th, 2023. The results of the application, which was entered using the location and description of the limits of the proposed project site, stated that there was an expectation of the presence of Eastern Hognose Snakes within the project area. In accordance with protective measures outlined in the report, the contractor will not disturb suitable habitat areas during hibernation periods, they will perform reptile sweeps around equipment and stockpiles prior to starting activities for the day, and ensure silt fencing is secure to the ground to create an exclusionary barrier around the site.

6.G Water Quality

The maintenance of vegetation at the site and de minimis amount of infrequently-trafficked impervious cover suggests that water quality at the site will be maintained from existing conditions with no direct sediment loads proposed.

6.H Stormwater Management

The stormwater control plan outlines procedures for installing erosion and sediment controls, and monitoring these controls as well as the stormwater features to ensure they remain in proper functioning order. All guidance provided to project personnel through the control plan is in adherence with the latest CT Stormwater General Permit, CT Stormwater Quality Manual and CT Guidelines for Soil Erosion & Sediment Control.

6.I Noise

Potential Project-related noise is regulated by General Statutes section 22a-69. For Class A Emitter to Class A which the Property, and surrounding receptors, are located in, General Statutes prescribes a maximum level of 55 dBA for daytime hours and 45 dBA at property boundaries for nighttime hours. Construction noise is exempt from the statute. Due to the nature of the use, facility design, required equipment and distance from

potential noise receptors, the proposed Project is expected to have no adverse noise-related impact on the surrounding area. To ensure the proposed Project is in compliance, GCE conducted a Noise Study. See, Appendix N.

6.J FAA Determination

The Applicant used the Federal Aviation Administration (“FAA”) Notice Criteria Tool to screen the Project Area to assess if the Project triggers the FAA Notice Criteria. The result of the initial screening on February 23, 2024 is that no additional notice is required for FAA. See, Appendix J, FAA Determination.

6.K Visibility

The Applicant selected the Project’s location, among other reasons, due to its limited impact on public viewsheds. The Project should also have limited visual impact to abutters. The Project has been sited on land which is generally low visibility from surrounding roads, residences, and any designated public recreation area (i.e. playing fields, walking trails, or parks). Visual impacts of the Project from multiple directions are naturally mitigated due to a variety of distance, topography, and existing vegetation. Discussions between the Applicant and abutting parcel owners to the Project are ongoing and the Applicant intends to incorporate mitigation screening into the site development plan.

6.L Electric and Magnetic Fields

Existing sources of electric and magnetic fields (“EMF”) along the boundaries of the Project site include the EMF associated with the Eversource 23-kV overhead distribution line to which the electricity from the solar arrays will connect. During Project operation, electric and magnetic fields on the Project site are expected to derive from the following sources: (1) the DC solar panels; (2) the DC cables that connect the solar arrays to the power inverter; and, (3) the AC power inverters that convert the DC power to AC power; and, the proposed DC solar panels, AC power inverters, and AC transformers will be located more than 100 feet from the boundaries of the site, with the nearest residences even further away. DC magnetic-field levels from cables connecting the solar arrays to the

inverters will produce a DC magnetic field, however, it is anticipated that this EMF would represent a small fraction of the earth's natural static (i.e., DC) geomagnetic field. The higher-frequency AC fields from the inverters, like the DC fields from the solar panels, generally decrease to near background levels within a few of feet of distance from the panels. Thus, the operation of these sources is not anticipated to appreciably change the EMF levels outside the Project site. Based on the considerable distance of the Project Area from the boundaries of the Project site, the EMF from the solar panels, power inverters, and related equipment, collectively, are not anticipated to affect the EMF levels outside the Project Site's boundary. A more detailed analysis of the Project's potential EMF can be found in Appendix M.

7. Conclusion

The Project clearly meets the standards set forth in Conn. Gen. Stat. §16-50k(a). Specifically:

- The Project meets CT DEEP's air and water quality standards, with no material emissions associated with either construction or operation, and water quality standards associated with construction and operational stormwater management a primary focus of the Project's design;
- The Project has been configured to avoid any substantial environmental impacts by utilizing land which has unused and left fallow for decades;
- The Project as designed will adequately protect agricultural resources; and
- The Project will not alter areas of core forest.

In addition, the Project would not be visible from any public viewsheds or from surrounding properties, nor will there be any impacts from noise.

Given the benefits this Project will provide to the State of Connecticut, GCE respectfully requests that the Council approve this Project as currently designed and issue a Certificate of Environmental Compatibility and Public Need.