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July 24, 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 4.75 MW AC GROUND-MOUNTED SOLAR PHOTOVOLTAIC PROJECT AT JEREMY HILL ROAD IN STONINGTON AND NORTH STONINGTON, CONNECTICUT

Dear Ms. Bachman:

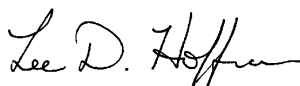
I am writing on behalf of my client, Greenskies Clean Energy, LLC, which is submitting the enclosed Application for a Certificate for a facility to be located at Jeremy Hill Road in Stonington and North Stonington, Connecticut. With this letter, I am enclosing an original and 15 copies of the Application and a check for \$33,374.88 for public participation costs (\$25,000), as well as the application fee (\$8,374.88).

In addition, I am including the “Bulk” filing, of which one hard copy 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 Plans of Conservation and Development for Stonington and North Stonington. A copy of the original application package to the towns of Stonington and North Stonington is also included. A copy of all materials is located at:

<https://url.us.m.mimecastprotect.com/s/WLkoCL9PVnIYgvX2FBfxyg5fZ>

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 Stonington and North Stonington.

Sincerely,


Lee D. Hoffman

**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 4.75 MW AC Ground-mounted
Solar Photovoltaic Electric Facility Located at Jeremy
Hill Road, Stonington Connecticut**

**Prepared for
The Connecticut Siting Council**

July 24, 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 Towns of Stonington and North Stonington, Connecticut. The Project consists of the development of a 4.75-megawatt (“MW”) alternating current (“AC”) ground-mounted solar photovoltaic (“PV”) system (“Facility”) located at 54 Jeremy Hill Road, North Stonington CT 06359 (“Property” or “Project Site”). See Figure 1 – Site Location Map and Figure 2 – Proposed Project Areas Aerial.

GCE has been working to develop this Project since 2021. In April 2023, GCE was awarded funding for the 4.75 MW solar array through the Shared Clean Energy Facility (“SCEF”) program, which has been designated #SCEF 4-8733. 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 June 7, 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 would span two parcels, one parcel is located within the Town of Stonington Rural Residential Zone RR-80 zoning district and the other parcel is located within the town of North Stonington’s Medium Density Residential R-60 zoning district. More specifically, the Project is located on approximately 21.57 acres on a 62.45-acre parcel in

Stonington and 0.2 acres on a 9.23 acre parcel in North Stonington (“Project Area”). See Figure 3 – Zoning Map. The Stonington parcel is listed by the Town of Stonington’s Assessor’s Office as ID 114670 and the North Stonington parcel is listed as ID 115-7823. The parcels are currently owned by Erick & Patricia Taylor. 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 Project.

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 and development 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.

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:

Gabriel Rusk
Project Developer
Greenskies Clean Energy LLC
127 Washington Ave
West Building, Garden Level
North Haven, CT 06473
Gabe.rusk@greenskies.com

Lee D. Hoffman
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103
lhoffman@pullcom.com
860-424-4315

Both individuals consent to electronic service of all communications regarding this Application.

¹ See, <https://www.seia.org/news/solarmeanbusiness2022>

3. Project Description

3.A Site Selection

The Project Site 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 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 Site 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 has been made to minimize adverse effects of development on the land.

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.

3.B Project Description

The current PV array on the site plan has a nameplate capacity of 4.75 MW AC and is designed with 397 strings of 26 modules, for a total of 10,322 modules with 10ft aisle width between rows. There would be 38 125kW inverters that are to be centralized within the array and mounted to or adjacent to the equipment pads. The DC capacity is 5.573 MW and the AC capacity is 4.75 MW. The DC to AC ratio is designed as 1.17. 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 pole across the street from the access road at Jeremy Hill Road as shown on the electrical plans.

Applicant proposes a 7-foot high chain link fence to be installed around the perimeter of the solar array field to provide site security, as well as to address National Electric Code requirements. The perimeter fencing would extend around the array. There would be access gates, with locking hardware, proposed along the perimeter for access to the array and permanent stormwater basins. See Appendix A.

Erick and Patricia Taylor are the owners of Devon Point Farm located in North Stonington (www.devonpointfarm.com) and purchased the Property in 2019. Imagery suggests that farming operations ended in the mid-1970s. The Project Site has since been left largely alone to revegetate. As Erick and Patricia Taylor have sought to supplement their income from their other agricultural operations, the most appealing option would come in the form of converting a portion of the Property to allow solar panels to be placed on their Property. Developing a solar farm on the site would allow the Taylors 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 is pursuing farming opportunities on this site in collaboration with the landowner and has created an advanced agricultural co-use plan. 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. GCE requested the opportunity for a pre-application meeting with the Department of Agriculture, but that request was refused. GCE therefore opted to not obtain the Department of Agriculture's approval for this Application. GCE is

working 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. While GCE does anticipate a reduction in potential acreage used for agricultural uses, the Project, as proposed would result in greater agricultural use as well as improvement of soil health.

According to the Town of Stonington's Zoning Map, the principal use of the Property is in the Rural Residential Zone RR-80. While the development will primarily take place in Stonington, the access road will be developed within North Stonington's Zoning Map, and is located within the Medium Density Residential R-60 zone. Access to the Property will be through the existing access road attached to Jeremy Hill Road. All construction, maintenance, and all other activities related to the Project Area will use the access road. The Rural Residential RR-80 Zone of Stonington has a rural character, and restricted development potential due to general land conditions. The zone allows for certain uses to be permitted via a special permit. Some of the uses requiring a special permit are Agriculture or Aquaculture, Elementary or Secondary Schools, Golf Courses, Excavation Operations, Lumber Mills, Municipal Facilities, Restaurants, and Hospitals. Applicant believes that the proposed Project falls within the intensity of the uses allowed with a special permit in the Rural Residential RR-80 Zone of Stonington. The Medium Density Residential R-60 Zone of North Stonington is expected to attract the majority of the Town's growth. The zone allows for certain uses to be permitted via a special permit. Some of the uses requiring a special permit are Solar Energy Systems, Specialized Agricultural Buildings, Wireless Communication Facilities, and Farm Winery Restaurants. Applicant believes that the proposed Project falls within the intensity of the uses allowed with a special permit in the Medium Density Residential R-60 Zone of North Stonington.

This Project is seven miles north of the center of the Town of Stonington, and two miles southwest of the center of the town of North Stonington. The Project Area sits inside four roads that intersect to make a square. To the north is Mystic Road, to the east is Jeremy Hill Road, to the south is New London Turnpike, and to the west is Al Harvey Road. These roads are split between residential properties, farms, and commercial businesses

interspersed with heavily wooded areas. The Project site sits on a secluded access road connecting to Jeremy Hill Road, surrounded by woods. To the immediate east and north of the Project, residential homes line Jeremy Hill Road along with the North Stonington Bible Church and a roofing contractor, CD Roofing. South of the Project, New London Road is similarly made up of residential properties interspersed with light commercial and agricultural services including Pequots Plant Farm, Stonington Vineyards, and Donna Miller Seamstress. To the north is Wychwood Field-(CT48) Airport and the Hoffman Evergreen Preserve. The proposed Project fits well within this transitional section of town, being a melding of light commercial use, and agricultural production.

The primary access point to the Project will be via a gravel access road at the northeast corner of the parcel abutting Jeremy Hill 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 3610 linear foot internal gravel roadway within the Project Area to provide centralized access to the proposed solar array, electrical equipment, and stormwater detention basins. Applicant proposes the construction of the roadway on prepared subgrades with a gravel topping which would match existing grades to the greatest extent feasible. See Figure 6 – Proposed Project Layout and Appendix A – Sheet C-2.0 Layout and Materials Plan – Overall.

3.C Interconnection

The interconnection application for the solar array was submitted to Eversource Energy on July 1, 2020. The proposed Project is proposed to interconnect with the 32P Shunock Substation via the 13.8kV 32P Shunock 32P4 feeder. The point of interconnection will be at a pole across the street from the access road on the eastern side of the parcel along Jeremy Hill Road as shown in the electrical plans. See, Appendix B.

Eversource has completed all required studies and issued the Applicant an Interconnection Agreement on December 13, 2023.

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 Towns the Project is located in, 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 regional and 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 SCEF 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 since 2021. GCE has also reached out to abutters directly via U.S. Mail and provided notice of this Application to the broader public through the use of newspaper publication. In short, GCE takes its outreach obligations seriously, and has taken steps to ensure that the public, and those officials who serve the public, are aware of this Project.

The public outreach efforts for this project stretch for more than three years. The first public outreach occurred in May of 2021. On May 13, 2021, GCE met with representatives of the government of North Stonington. At the meeting, GCE shared its intent to build a 5MW project on the parcel and provided an overview of the parcel's current use and existing conditions as well as the expected project features such as the expected interconnection.

On May 4, 2021 GCE, met with the government of Stonington. At the meeting, GCE shared its intent to build a 5MW project on the parcel and provided an overview of the parcel's current use and existing conditions as well as the expected project features such as the

expected interconnection. GCE also conducted a site walk with government officials of the surrounding area on May 22, 2021.

In addition to local public outreach, GCE has been involved in outreach at the state level as well. When GCE first contemplated this Project in 2021, it reached out to representatives of both the Department of Agriculture and the Forestry Division of the Connecticut Department of Energy and Environmental Protection (“CT DEEP”). Representatives of the Department of Agriculture and the Forestry Division were invited to the site with GCE in the summer of 2021.

Although representatives of the Forestry Division did not tour the site at that time, the Forestry Division indicated that its position was that although the site did not have trees on it at this time, it was possible that early successional habitat could give rise to a young forest eventually. Thus, the Forestry Division indicated in 2021 that it would not issue a written ruling on a lack of impact to core forest in 2021, given the site’s potential to develop into core forest at some future point.

In June of 2023, GCE revisited the site and noted that while more invasives species such as Autumn Olive, Multiflora Rose, and Black Locust were present, there were very minimal natural hardwood saplings growing in the cleared area. GCE prepared a photolog to compare 2021 conditions to the current conditions of 2023, submitted that photolog to the Forestry Division, and invited the Forestry Division to visit the site. In response, a DEEP representative visited the site to confirm the presence of invasive species. After that site visit, the Forestry Division recommended that GCE retain a qualified forester to prepare a report concerning the conditions at the Project Site, and the Forestry Division would then be able to review that report. For a variety of reasons, GCE placed the project on hold for a period of time. However, GCE reached back out to governmental officials in the second quarter of 2024 which is described below.

GCE heeded the Forestry Division’s advice and retained a duly licensed forester to inspect the site and complete a forestry report on forms designated by CT DEEP. On May 10th,

2024, GCE submitted the forester's report to the Forestry Division. The report concluded that although there were core forest species present at the site, the tract did not meet the forest density requirements to be considered forest land. In other words, saplings were present at the site, but at most in a concentration of roughly half of the 600 saplings per acre that would be necessary to qualify the tract as forest under applicable regulations.

Given that information, GCE wrote to the Forestry Division to seek the Division's concurrence that the site in its current condition does not constitute core forest, nor will it be likely to develop into core forest. On May 30th, 2024, a letter was sent to the Council from the CT 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.

As mentioned above, GCE has also been consulting with the Department of Agriculture since 2021. Indeed, as alluded to above, representatives of the Department of Agriculture visited the site in 2021 when the project was first under consideration. Given the unique characteristics of the proposed Project, such as the area's previously forested nature, the fact that tree removal that had occurred at the property several years ago (when the property was being contemplated to be converted into tract housing) left stumps and tree roots behind, combined with the knowledge that the Project had not been farmed since 1970s, GCE believed that the use of the property as a solar project would not adversely impact agriculture.

The Department of Agriculture disagreed. GCE attempted to resolve that disagreement, however, GCE has found that the Department of Agriculture's new application process has become an overly onerous barrier for the receipt the letter of no impact that is required for a proposed project to utilize the Siting Council's petition for declaratory ruling process. On April 22, 2024, GCE requested a preapplication meeting with the Department of Agriculture to re-open the discussions regarding GCE's intent to develop the proposed Project on Prime Farmland soils. On May 3rd, 2024, the request was refused on the grounds that prime farmland was regulated based on soils rather than current

usage. As mentioned above, GCE was unwilling to pursue a letter of no impact from the Department of Agriculture, given the lack of prior farming of the parcel and the Department's insistence on overly-high regulatory requirements. Nonetheless, GCE recognizes that agriculture and solar development are not mutually exclusive endeavors, and GCE intends to pursue agricultural activities on the site. While the exact use is still being explored, GCE is working with the landowner (who is currently engaged in livestock agriculture on adjacent and nearby parcels) to design an agricultural co-use of the raising of fowl and planting of perennial cold season grasses. A copy of GCE's correspondence and proposed agricultural use is available in Appendix L.

As GCE's other negotiations with the Department of Agriculture and DEEP's Forestry Division were taking place, GCE recognized that the project would be more suitable for an application for a certificate, rather than a petition for declaratory ruling. Accordingly, GCE prepared a draft Application and on May 17, 2024, GCE called the First Selectmen of the Towns of Stonington and North Stonington 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 later that day, and offering to present in person on the subject. GCE provided draft copies of this Application to representatives of the Towns of Stonington and North Stonington. On May 20th, the Zoning official of Stonington responded and invited GCE to present to Town officials on the project. GCE agreed, and presented on the project at 11:30 AM on May 29th, 2024 to the Zoning and Planning officials of Stonington. GCE followed up after the meeting with both officials, and on May 17th, both officials confirmed they had no comments or concerns about the project.

On May 18th, 2021, GCE conducted outreach to abutting neighbors of the Project to inform them of the intent to develop a solar array. GCE also conducted follow up correspondence to address neighbor questions. More recently, on July 12, 2024, GCE sent letters to each abutter of the Property, formally informing them of GCE's intent to file this Application with the Council. In addition, on July 16 and 18, 2024, GCE published a legal notice regarding this Project and GCE's Application to the Siting Council in *The New*

London Day, a newspaper of general circulation in the area. Public outreach documentation is included in Appendix O.

6. The Project will not cause adverse environmental effects

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 always be a designated construction manager and/or site safety officer or representative present 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 6:30 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 glues 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.A Natural Environment and Ecological Benefits

The site consists of approximately 26 acres proposed to be developed on an overall parcel of land, which lies in a residential zone. The overall land use of the development area is timber harvest/clearing, and has been owned by Patty & Erick Taylor prior to the inception of the Project.

The Project intends to minimize impact to the existing land and grade, outside of excavation for stormwater basins. Minimal tree clearing will be needed for shading purposes that would impact panel efficiency, and thus, the current native woodland perimeter will provide screening to any residences in the vicinity of the Project. 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 6:30 AM to 5:00 PM daily Monday through Fridays.

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 Project 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 includes the neighboring houses to the east of the Project. In either case, the existing tree line will provide appropriate screening, presumably even during leaf-off seasons due to the density and topography. A visual cross section was prepared for the single property closest to the edge of the development area and is attached as Appendix I.

6.E Historic and Archaeological Resources

A Phase 1A cultural resource survey, dated April 2021 and prepared by Heritage Consultants, concluded that the majority of the reviewed Project Area contained a moderate/high sensitivity for archaeological resources and recommended a Phase 1B study be performed. A Phase 1B cultural resource reconnaissance survey, dated April 2024, was submitted to the State Historical Preservation Office (“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. A letter of concurrence that no historic properties would be affected was provided for the Project by SHPO on April 10, 2024. All documentation of this aspect of the project is included in Appendix F.

6.F Habitat and Wildlife

An application was submitted to CT DEEP Wildlife Division, Natural Diversity Database, and a Final Determination dated June 18, 2021 was received listing no potential rare, threatened, or endangered species at the Project Area. A one-year renewal letter was issued on June 18, 2023 for the Project and is included herewith as Appendix H. On June 17th, 2024 Greenskies filed for a CTDEEP Stormwater Permit while the renewal letter was active.

6.G Water Quality

The maintenance of vegetation at the Project Site and *de minimis* amount of infrequently-trafficked impervious cover suggests that water quality at the Project Site will be maintained from existing conditions with no direct sediment loads proposed. A series of permanent stormwater management basins have been incorporated into the site plan design which will also capture, retain, and treat water quality prior to discharge from the site.

6.H Stormwater Management

A comprehensive stormwater control plan has been compiled for use in managing the impact of construction and the overall project development on the surrounding environment. 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. The Project currently contemplates the construction of 6 long-term stormwater basins and associated conveyance swales. The Stormwater Report for the project is included in Appendix E.

6.I Noise

Potential Project-related noise is regulated by Connecticut General Statutes Section 22a-69. For a Class A Emitter to Class A Receptor which the Property and surrounding receptors, are located in, the 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 with applicable noise standards, GCE conducted a Noise Study, the results of which are included in 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 April 24, 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 distance, topography, and existing vegetation. Discussions between the Applicant and abutting parcel owners to the Project are ongoing.

6.L Electric and Magnetic Fields

Existing sources of electric and magnetic fields ("EMF") along the boundaries of the Project Area include the EMF associated with the Eversource 13.8-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. The proposed DC solar panels, AC power inverters, and AC transformers will be located more than 100 feet from the boundaries of the Project 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 Area. 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.

Further, according to the Council’s revised EMF Best Management Practices dated February 7, 2014, the Council recognized that a 2010 guideline established 2,000 mG as an acceptable exposure level to EMF. The Council also recognized that there is scientific consensus that there is no cause-and-effect link with EMF and any health effect, and that “scientific evidence to date does not warrant the establishment of MF exposure limits” surrounding transmission lines. In 2015, the Massachusetts Department of Energy Resources, Department of Environmental Protection, and Clean Energy Center released a solar guide that states that PV arrays generate EMF in the same extremely low frequency range as electrical appliances and wiring found in most homes and buildings and that the measurements at three commercial PV arrays in MA gave off less than 0.5 mG at the sites’ boundaries and typically PV arrays give off less than 1.0 mG within three inches of the panels, whereas a vacuum cleaner three feet away from a motor is approximately 2.0 mG.

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 been unused and left fallow for decades; and
- The Project will not adversely impact 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.