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**From:** Williams, Andrea Nicole (Andrea N) CIV USARMY CENAE (USA)  
<Andrea.N.Williams@usace.army.mil>  
**Sent:** Wednesday, June 17, 2026 2:24 PM  
**To:** Megan Raymond <mraymond@vhb.com>  
**Subject:** RE: [External] RE: AJD - NAE-2026-00102

Based on the documentation, I don't anticipate any changes to the proposed federal boundary.

Andrea Williams  
Project Manager, Regulatory Division  
New England District  
U.S. Army Corps of Engineers  
OP: 978-318-8494  
CP: 978-992-8163

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**From:** Megan Raymond <[mraymond@vhb.com](mailto:mraymond@vhb.com)>  
**Sent:** Wednesday, June 17, 2026 2:17 PM  
**To:** Williams, Andrea Nicole (Andrea N) CIV USARMY CENAE (USA)  
<[Andrea.N.Williams@usace.army.mil](mailto:Andrea.N.Williams@usace.army.mil)>  
**Subject:** [Non-DoD Source] RE: [External] RE: AJD - NAE-2026-00102

Ok, got it, thank you, Andrea, understood.

Do you anticipate any changes to the federal wetland boundary as presented in the submitted information?

Best, Megan

**Megan B. Raymond, MS, PWS, CFM**

Director Natural Sciences  
CT-Environmental

P [860.266.2311](tel:860.266.2311) | M [203.824.1920](tel:203.824.1920)

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**From:** Williams, Andrea Nicole (Andrea N) CIV USARMY CENAE (USA)  
<[Andrea.N.Williams@usace.army.mil](mailto:Andrea.N.Williams@usace.army.mil)>  
**Sent:** Wednesday, June 17, 2026 2:13 PM  
**To:** Megan Raymond <[mraymond@vhb.com](mailto:mraymond@vhb.com)>  
**Subject:** RE: [External] RE: AJD - NAE-2026-00102

Hi Megan,

My supervisor is out for the day, and it is a federal holiday this weekend so it won't be until next week at the earliest.

Thanks,

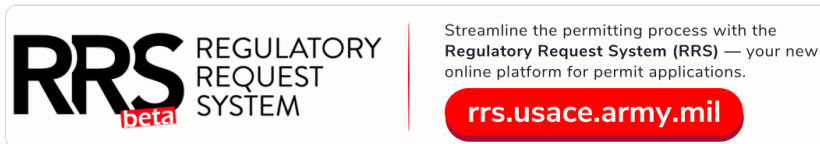
Andrea Williams  
Project Manager, Regulatory Division  
New England District  
U.S. Army Corps of Engineers  
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**From:** Megan Raymond <[mraymond@vhb.com](mailto:mraymond@vhb.com)>  
**Sent:** Wednesday, June 17, 2026 1:45 PM  
**To:** Williams, Andrea Nicole (Andrea N) CIV USARMY CENAE (USA)  
<[Andrea.N.Williams@usace.army.mil](mailto:Andrea.N.Williams@usace.army.mil)>  
**Subject:** [Non-DoD Source] RE: [External] RE: AJD - NAE-2026-00102

Hi Andrea – Following up on this: are you able to estimate a timeframe for your supervisor review/issuance of the AJD please?

Thank you for your review, best, Megan

**Megan B. Raymond, MS, PWS, CFM**

Director Natural Sciences  
CT-Environmental

P [860.266.2311](tel:860.266.2311) | M [203.824.1920](tel:203.824.1920)

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**From:** Williams, Andrea Nicole (Andrea N) CIV USARMY CENAE (USA)  
<[Andrea.N.Williams@usace.army.mil](mailto:Andrea.N.Williams@usace.army.mil)>  
**Sent:** Wednesday, June 10, 2026 10:51 AM  
**To:** Megan Raymond <[mraymond@vhb.com](mailto:mraymond@vhb.com)>  
**Subject:** RE: [External] RE: AJD - NAE-2026-00102

Hi,

Apologies for the delay, I have been out of office at another training and am just getting back through emails. I am working on the AJD which will then go to my supervisor to review. I will

reach out if I have any additional questions.

Thanks,

Andrea Williams  
Project Manager, Regulatory Division  
New England District  
U.S. Army Corps of Engineers  
OP: 978-318-8494  
CP: 978-992-8163

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**From:** Megan Raymond <[mraymond@vhb.com](mailto:mraymond@vhb.com)>  
**Sent:** Wednesday, May 27, 2026 1:48 PM  
**To:** Williams, Andrea Nicole (Andrea N) CIV USARMY CENAE (USA)  
<[Andrea.N.Williams@usace.army.mil](mailto:Andrea.N.Williams@usace.army.mil)>  
**Subject:** [Non-DoD Source] RE: [External] RE: AJD - NAE-2026-00102

Hi Andrea – I was curious for an update on the AJD? Will you please let me know when you have a minute.

Thanks!

Megan

**Megan B. Raymond, MS, PWS, CFM**  
Director Natural Sciences  
CT-Environmental  
P [860.266.2311](tel:860.266.2311) | M [203.824.1920](tel:203.824.1920)  
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**From:** Williams, Andrea Nicole (Andrea N) CIV USARMY CENAE (USA)

<[Andrea.N.Williams@usace.army.mil](mailto:Andrea.N.Williams@usace.army.mil)>

**Sent:** Monday, May 11, 2026 8:43 AM

**To:** Megan Raymond <[mraymond@vhb.com](mailto:mraymond@vhb.com)>

**Subject:** [External] RE: AJD - NAE-2026-00102

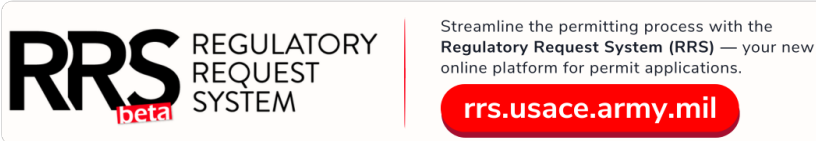
Hi Megan,

I received the datasheets in your previous email so don't worry about uploading them to RRS. Thanks!

Andrea Williams  
Project Manager, Regulatory Division  
New England District  
U.S. Army Corps of Engineers  
OP: 978-318-8494  
CP: 978-992-8163

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**From:** Megan Raymond <[mraymond@vhb.com](mailto:mraymond@vhb.com)>

**Sent:** Monday, May 11, 2026 8:37 AM

**To:** Williams, Andrea Nicole (Andrea N) CIV USARMY CENAE (USA)

<[Andrea.N.Williams@usace.army.mil](mailto:Andrea.N.Williams@usace.army.mil)>

**Subject:** [Non-DoD Source] RE: AJD - NAE-2026-00102

Andrea – One of my staff has originated the AJD online and they are no longer with VHB, so I can't upload the datasheets or map that I just sent to you. I have "write" access and was able to upload docs before the submittal but now I can't seem to. Will you please let me know how to send the datasheets, if you did not receive as attachments in my previous email?

Thank you!

**Megan B. Raymond, MS, PWS, CFM**

Director Natural Sciences  
CT-Environmental

P [860.266.2311](tel:860.266.2311) | M [203.824.1920](tel:203.824.1920)

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**From:** Megan Raymond

**Sent:** Monday, May 11, 2026 8:33 AM

**To:** Andrea Williams ([andrea.n.williams@usace.army.mil](mailto:andrea.n.williams@usace.army.mil)) <[andrea.n.williams@usace.army.mil](mailto:andrea.n.williams@usace.army.mil)>

**Subject:** [Pending]AJD - NAE-2026-00102

Hi Andrea – here are the data sheets and data collection map for the above referenced AJD. Please note the difference between CT state and federal wetlands along the delineated boundaries.

Any questions, please let me know! I will also try and upload these data in the RSS now and let you know if I have any problems.

Thank you, Megan



**Megan B. Raymond, MS, PWS, CFM**

Director Natural Sciences  
CT-Environmental



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**From:** rrs@usace.army.mil  
**Sent:** Tuesday, March 10, 2026 8:35 AM  
**To:** IGottheim@Verogy.com; Megan Raymond;  
Andrea.N.Williams@usace.army.mil; Anna Loss; Megan Raymond  
**Subject:** [External] Department of the Army Jurisdictional Determination Request:  
NAE-2026-00102 - Husky Land Development

The U.S. Army Corps of Engineers, New England District has assigned your Jurisdictional Determination request:

File Number: NAE-2026-00102

Project Manager: Andrea N Williams, [Andrea.N.Williams@usace.army.mil](mailto:Andrea.N.Williams@usace.army.mil), 9783188494

Please reference this file number in all correspondence and communication with us concerning this request.

The U.S. Army Corps of Engineers Regulatory program is committed to providing you with the highest level of public service. Your request will be processed in the order it was received, and the assigned project manager will contact you if any additional information is required to complete the review of your request.

General information about the U.S. Army Corps of Engineers' Regulatory Program is available on the Regulatory Request System homepage at: <https://rrs.usace.army.mil>

Information specific for your region can be found at the New England District website at: <http://www.nae.usace.army.mil/Missions/Regulatory.aspx>

This mailbox is not monitored. If you have any questions, please contact your assigned project manager directly.



March 5, 2026

Ref: 200236.00

U.S. Army Corps of Engineers - New England District  
RRS Online Submittal and  
cenaer-nwp@usace.army.mil  
696 Virginia Rd  
Concord, MA 01742-2751

Re: Husky Land Development - Approved Jurisdictional Determination/No Permit Required Request  
Sterling Hill Road  
Moosup (Plainfield), Connecticut

Dear Colleague:

On behalf of VCP Pledgor 4, LLC (the Permittee), Vanasse Hangen Brustlin, Inc. (VHB) is submitting the following approved jurisdictional determination (AJD) request for the Husky Land Development Project located on Sterling Hill Road (Parcel ID No. 031-0061-0003) in the Village of Moosup (Town of Plainfield), Connecticut. The AJD is requesting the United States Army Corps of Engineers (USACE) New England (NED) confirm that three isolated wetlands, totaling 0.98-acres, and farm field wetlands, totaling 13.67-acres, are excluded from federal jurisdiction under the Clean Water Act (CWA)<sup>1</sup>. In addition, VHB is requesting the USACE issue a “no permit required” letter for future work within farm field wetlands.

The AJD is being submitted through USACE’s Regulatory Request System (RRS), with this cover letter providing an overview to support USACE’s review. The USACE NED previously assigned File No. NAE-2026-00102 to the project in January 2026 with the submittal of a Self-Verification under Connecticut General Permit 21: Temporary Construction Mats. The SV was subsequently withdrawn on February 27, 2026.

## Wetland Jurisdictional Overview

VHB scientists delineated wetlands on the ±255-acre subject parcel in Fall 2024. The property contains no floodplains or special flood hazard areas, and the closest perennial stream, Ekonk Brook, is located across Sterling Hill Road to the southwest 0.35 miles from the parcel. Five wetlands were identified during field investigations: BW1, BW2, BW3, BW4, and BW4b. Wetland BW2, BW3, and BW4b are excavated, isolated depressional features that do not have a hydrological connection to an adjacent wetland. VHB is seeking USACE concurrence that the isolated wetlands are not federally jurisdictional under the CWA. Additionally, VHB seeks confirmation from USACE that the farm field portions of BW1 and BW4 are not subject to the CWA based on the lack of continuous surface water connection and the lack of adjacency of the farm fields wetland to relatively permanent surface waters. The farm field portions of BW1 and BW4 were flagged as Connecticut (CT) state wetlands due to the CT state wetland definition that relies solely on soil drainage class. However, the farm field wetlands within BW1 and BW4 do not display vegetative or hydrologic characteristics to be regulated as an adjacent wetland per 33 *Code of Federal Regulations (CFR) Part 328 – Definition of Waters of the United States*. The farm field wetlands do not display a direct continuous surface water connection to Ekonk Brook, or its tributaries. The closest stream channel to the farm fields is an erosive feature that has been manipulated by farming

---

<sup>1</sup> VHB’s attached Wetland and Watercourse Delineation Report, dated March 3, 2026, provides details and figures, including a delineation map.



practices and is separated from the fields by an earthen berm. Furthermore, most of the poorly drained areas within the active agricultural fields have been consistently used for hay production prior to 1934, with small areas being brought into production between 1951 and 1970. A dominant hydrophytic vegetation community within the farm fields is precluded by agricultural production and field management. Historic aerial imagery of the parcel is provided, from 1934 to present day, with the 2025 farm field boundary identified over time. The agricultural farm fields continue to be used for annual hay production.

Please do not hesitate to contact me at [mraymond@vhb.com](mailto:mraymond@vhb.com) or 203.824.1920 if you have any questions, comments, or require further information regarding the enclosed materials.

Sincerely,

VHB

A handwritten signature in black ink, appearing to read "Megan B. Raymond", with a long horizontal flourish extending to the right.

Megan B. Raymond, MS, PWS, CFM  
Director of Natural Sciences

cc: Ian Gottheim, PE – Verogy (Permittee)

Attachments

- 1) Wetland and Watercourse Delineation Report, dated March 3, 2026
- 2) Right of Entry (ENG Form 6294)
- 3) Agent Authorization Form (ENG Form 6295)
- 4) Figures –
  - Figure 1-1: Historic Aerial Map - 1934
  - Figure 1-2: Historic Aerial Map – 1951
  - Figure 1-3: Historic Aerial Map – 1970
  - Figure 1-4: Historic Aerial Map – 1986
  - Figure 1-5: Historic Aerial Map – 1990
  - Figure 1-6: Historic Aerial Map – 1996
  - Figure 1-7: Historic Aerial Map – 2025

# HUSKY LAND DEVELOPMENT BELLAVANCE PROPERTY

Village of Moosup, Town of Plainfield, Connecticut



PREPARED FOR

Brookfield Renewable U.S.  
200 Liberty St., 14th Floor  
New York, New York 10281

PREPARED BY



100 Great Meadow Road  
Suite 200  
Wethersfield, Connecticut 06109

March 6, 2026

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# 1

## Introduction

As requested by Brookfield Renewable, U.S. (the Client), Vanasse Hangen Brustlin, Inc. (VHB) completed an onsite investigation to determine the presence or absence of state and federally regulated wetlands and/or watercourses on a ±255 parcel (Town of Plainfield Tax Parcel ID. No. 031-0061-0003) of the ±460-acre Husky Land Development Project – Bellavance Property in northeastern Connecticut (Figure 1). Site investigations were completed by VHB in late summer 2024. In summary, five wetlands and watercourse systems totaling ±93 acres, were identified and delineated. The wetland systems consist of mixed class palustrine forested broad-leaved deciduous and modified farm field wetlands underlain by glacial till soils.

## Environmental Setting

Located in the Eastern Highlands ecoregion of Connecticut, the site is in the Town of Plainfield (Village of Moosup) in Windham County, Connecticut. The property has supported continuous agricultural activity since before 1934, and contains a mix of farm fields, forested areas, and wooded field edges within a variable topographic and hydrologic landscape. The surrounding land-use is rural and primarily agricultural, with scattered single-family dwellings punctuating the landscape and the village of Moosup approximately one mile to the northwest. A maintained Eversource transmission line utility right-of-way (ROW) bisects the northern half of the site and runs east-west.

The site is largely undeveloped but displays evidence of past use (Figure 2). A farmhouse, accessed to the north from Sterling Hill Road, is located in the southwestern portion of the site and contains multiple outbuildings, including barns and storage sheds. Mown agricultural fields bisected by farm roads and hedgerows exist, and a large contiguous forest comprised of upland and wetland ecosystems encompasses the remainder of the undeveloped portions of the property. The forest is primarily located in the northeastern portion of the site, where steep slopes and surface hydrology may have limited agrarian activity, though logging occurred. Machine tracks and substantial acreage of second-growth vegetation stands are replete throughout the property.

Earthen and vegetative berms exist on the perimeter of the active farm fields at the interface with adjacent forested areas. These features consist of accumulated woody vegetative material, including branches, stumps, root masses, cut logs, and deadwood generated from routine field clearing and edge maintenance. Over time, decomposition of organic material and natural settling have resulted in the incidental incorporation of leaf litter, organic detritus, and minor amounts of native soil. Based on site observations and review of hillshade and aerial imagery, the berms appear

to have formed incrementally over time, with additional woody material placed in recent years consistent with the continued agricultural management of the property (Figure 3). This continued cycle of material placement and settling has created a defined raised, berm distinguishable from the adjacent field and forest elevations.

The site is comprised of a western portion of a drumlin with a topographic highpoint of  $\pm 560$ -feet (NAVD88), locally known as Webb Hill. The western portion of the site displays the lowest topographic elevation at  $\pm 130$  feet (NAVD88), and the eastern border of the site reached  $\pm 530$  feet (NAVD88). The site is located within the Thames River Major Drainage Basin and the lower portion of the Moosup River subwatershed (Figure 4). North of the farm fields, the site drains in diffuse channels and wetland streams to a twenty-four-inch culvert on Sterling Hill Road southwest of the property. The drainage from the site is intermittent and surface water hydrography is not mapped on the parcel. Intermittent drainage flows south in the western portion of the site to confluence with Ekonk Brook about 0.35-miles from the southwestern property line. Ekonk Brook flows north to drain to the Moosup River. No Federal Emergency Management Agency (FEMA) flood hazard areas are mapped onsite (Figure 5).

The U.S. Fish and Wildlife Service's (USFWS) National Wetlands Inventory (NWI) identifies three wetlands onsite (Figure 6). A freshwater emergent wetland and freshwater scrub-shrub wetland associated with an offsite watercourse adjacent to the western property line, and a freshwater forested/shrub wetland in the center of the property. These western property line wetland systems are identified through NWI as being diked or impounded systems. The Connecticut Environmental Conditions Onsite (CT ECO) mapper identifies poorly drained inland wetland soils in the northern and central portions of the property. Due to the varying hydrology and vegetative communities across the delineated wetlands, the systems vary in terms of federal and state regulations. All the delineated wetlands and watercourses are regulated through the Connecticut Inland Wetlands and Watercourses Act (IWWA), though not all the delineated resources are waters of the United States and subject to the Clean Water Act (CWA).

## Mapped Soil Units

Onsite investigations were generally consistent with Natural Resources Conservation Service (NRCS) mapping (Table 1) (Figure 7), though the NRCS mapping does not reflect poorly drained conditions in the majority of the farm fields.

**Table 1 NRCS Mapped Soil Units Onsite**

NRCS Soil Series	Drainage Category	Parent Material
Ridgebury, Leicester, and Whitman soils, 0 to 8 percent slopes, extremely stony	Poorly drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Sudbury sandy loam, 0 to 5 percent slopes	Moderately well drained	sandy and gravelly glaciofluvial deposits derived from granite and/or schist and/or gneiss
Woodbridge fine sandy loam, 0 to 3 percent slopes	Moderately well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Woodbridge fine sandy loam, 3 to 8 percent slopes	Moderately well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Woodbridge fine sandy loam, 8 to 15 percent slopes	Moderately well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist

Woodbridge fine sandy loam, 0 to 8 percent slopes, very stony	Moderately well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Woodbridge fine sandy loam, 8 to 15 percent slopes, very stony	Moderately well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Woodbridge fine sandy loam, 3 to 15 percent slopes, extremely stony	Moderately well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Canton and Charlton fine sandy loams, 0 to 8 percent slopes, very stony	Well drained	coarse-loamy over sandy melt-out till derived from gneiss, granite, and/or schist
Canton and Charlton fine sandy loams, 8 to 15 percent slopes, very stony	Well drained	coarse-loamy over sandy melt-out till derived from gneiss, granite, and/or schist
Canton and Charlton fine sandy loams, 3 to 15 percent slopes, extremely stony	Well drained	coarse-loamy over sandy melt-out till derived from gneiss, granite, and/or schist
Charlton-Chatfield complex, 0 to 15 percent slopes, very rocky	Well drained	coarse-loamy melt-out till derived from granite, gneiss, and/or schist
Paxton and Montauk fine sandy loams, 3 to 8 percent slopes	Well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Paxton and Montauk fine sandy loams, 8 to 15 percent slopes	Well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Paxton and Montauk fine sandy loams, 15 to 25 percent slopes	Well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Paxton and Montauk fine sandy loams, 3 to 8 percent slopes, very stony	Well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Paxton and Montauk fine sandy loams, 15 to 35 percent slopes, extremely stony	Well drained	coarse-loamy lodgment till derived from gneiss, granite, and/or schist
Rippowam fine sandy loam	Poorly Drained	coarse-loamy alluvium



# 2

## Wetland and Watercourse Delineation

VHB completed a wetland and watercourse delineation investigation during several site visits between August 5, 2024, and September 13, 2024. The investigation was completed by VHB's Certified Soil Scientists in accordance with the principles and practices noted in the United States Department of Agriculture (USDA) Soil Survey Manual (2017). This report includes photographic documentation of current conditions onsite (Appendix A) and a Wetland and Watercourse Delineation Map (Figure 8) that depicts the delineated wetland and watercourse resources and identifies which wetlands are state and federally regulated.

Weather conditions in the area prior to site visits were typical of the season. According to the National Drought Mitigation Center (NDMC), no drought conditions were indicated in the surrounding region during the delineation season.

### Regulatory Background

Wetlands and watercourses are regulated by both state and federal regulations, each with different criteria for establishing regulatory limits. The state may regulate waters that fall outside of federal jurisdiction; however, where federal jurisdiction exists, concurrent state jurisdiction is always present.

### Federal Regulation

Federal wetlands were delineated in accordance with the 1987 Corps of Engineers Wetland Delineation Manual (Environmental Lab. 1987) in conjunction with the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region (Version 2.0, January 2012). These documents establish the technical criteria for identifying wetlands based on the presence/absence of three required parameters: 1) hydric soils, 2) hydrophytic vegetation, and 3) wetland hydrology.

Hydric soils were identified using the Field Indicators of Identifying Hydric Soils in New England-Version 4, and by inference, Field Indicators of Hydric Soils in the United States: A Guide for Identifying and Delineating Hydric Soils Version 8.2. Vegetation and hydrology indicators were evaluated in accordance with the above-referenced delineation manuals and regional supplements. Specifically for vegetation, a wetland's plant community must present a prevalence of hydrophytic vegetation, as demonstrated through the dominant test.

Please note that delineation of wetlands using this methodology establishes the presence/absence of boundaries of wetlands based on ecological data. However, the presence of wetlands does not establish federal jurisdiction under the Clean Water Act.

Federal jurisdiction is determined pursuant to the definition of “waters of the United States” (WOTUS) at 33 C.F.R. § 328.3 (c)(2) (2023), as amended following the decision of the U.S. Supreme Court in the *Sackett v. Environmental Protection Agency*, 598 U.S. 651(2023). In *Sackett*, the Court held that wetlands are jurisdictional under the Clean Water Act only when they are indistinguishable from WOTUS due to a continuous surface water connection.

Consistent with the current WOTUS definition, adjacent wetlands are jurisdictional only where they have a continuous surface water connection to relatively permanent waters.

Therefore, in addition to confirming the presence of wetland criteria pursuant to the manuals and regional supplements identified above, evaluation of federal jurisdiction requires assessment of whether delineated wetlands maintain a continuous surface water connection with jurisdictional waters consistent with the current WOTUS definition.

## State Regulation

The Connecticut Inland Wetlands and Watercourses Act (§22a-38 CGS) identifies wetlands as poorly drained, very poorly drained, alluvial, or floodplain soils. Drainage class identifies the natural drainage condition of the soil (USDA-NRCS 2014) and refers to the frequency and duration of wet periods within the soil. Drainage class is inferred from observation of landscape position and relies principally on the presence or absence of features in the soil profile associated with soil development under saturated conditions.

## Local Regulation

Based on the Town of Plainfield’s Inland Wetlands and Watercourses Regulations dated September 1, 2022, the Upland Review Area buffer of 100 linear feet is measured horizontally from the boundary of any wetland or watercourse as a regulated area.

## Investigation Methodology

Using a hand auger, soil samples were taken to a depth of at least twenty-four inches to evaluate soil morphology (e.g., soil texture, Munsell color, structure). If poorly drained soils were identified, wetland boundaries were delineated with pink flagging labeled ‘Wetland Delineation’ and affixed to sturdy vegetation or small wire stakes if in fields or grass communities 25-50 feet apart. Similarly, watercourses are demarcated using blue flagging. Wetland and watercourse boundaries are subject to change until verified by local, state, or federal regulatory agencies.

An inventory of dominant vegetation and hydrology was also documented while delineating the limits and extents of resources onsite.

## Delineated Resources

VHB’s wetland and watercourse delineation resulted in the identification of five wetlands and watercourses (Figure 8). Described below, wetland classifications used to identify the type of wetland(s) occurring on the site are based on guidance from the U.S. Fish and Wildlife Service (USFWS) (Cowardin et.al. 1979), the Hydrogeomorphic Classification of Wetlands (HGM) (Brinson, 1993) and the Connecticut Inland Wetlands and Watercourses Act (CT Gen Stat § 22a-42a. (2023)).

**Table 2** Federally Delineated Wetlands

Wetland ID	Size (Acres)	National Wetland Inventory (NWI) Designation <sup>1</sup>
Wetland BW1	9.9	PFO6E
Wetland BW2	0	PEM1
Wetland BW3	0	PEM1
Wetland BW4	69.07	PFO6E
Wetland BW4B	0	PEM1

## Wetland BW1

Wetland BW1 is a ±9.9-acre mixed class forested deciduous swamp located on the western property line, extending further offsite to the west. Groundwater from the agricultural fields east of wetland BW1 discharges at the shoulder and side slope positions to form this seepage wetland. Wetland BW1 extends west off-site into a portion of gradually sloping hay fields that abut the site to the southwest. Wetland BW1 also contains a portion of an emergent vegetated wetland (USFWS: PEM2) in the north.

### Soils

Soils within wetland BW1 are formed in dense lodgement till. Slopes in wetland BW1 range from level to steep, with areas exceeding 20 percent slopes. The NRCS Soil Survey represents the steep area as Paxton and Montauk fine sandy loams, 15 to 35 percent slopes (86D). Dissimilar components were encountered that reflect seepage wetlands that have formed on this slope from groundwater discharge. Typic Endoaquepts and Epiaquepts were described in steep areas where groundwater discharges from side slope positions (Endoaquepts) and flows laterally through the surface of soils with shallow densic contact (Epiaquepts).

The hay field within and south of wetland BW1 is mapped as Woodbridge fine sandy loam, 8 to 15 percent slopes (45C). This map unit includes the Ridgebury series as a minor component. Soils within the portion of wetland BW1 that extends into the hay field were described as gravelly sandy loam with a depleted horizon (Bg) above a shallow densic contact (Cd), consistent with the Ridgebury series. However, this portion of wetland BW1 has also been continuously managed as a hay field since at least 1934, and therefore, the soils in this wetland have been repeatedly disturbed through plowing, grading, and agricultural manipulation, resulting in altered soil structure and hydrologic function.

### Hydrology

Wetland BW1 drains diffusely to the west to the Ekonk Brook tributary and is located in the Ekonk Brook subregional watershed. The hydrology of wetland BW1 is supported by groundwater discharge in areas with steep slopes (seepage) and by the lateral flow of groundwater perched over lodgement till deposits in gradually sloping areas.

Within the hay field portion of this wetland, an earthen berm is located along the perimeter of the field, separating the field from the rest of the forested wetland. During field investigations, no

<sup>1</sup> NWI nomenclature is available through the [National Wetlands Inventory](#) database

evidence of sheet flow was observed between the field and the adjacent forested wetland, with no observable outflow present.

## Vegetation

Forested portions of wetland BW1 consist of red maple (*Acer rubrum*) and American hornbeam (*Carpinus caroliniana*). Shrub species included Japanese barberry (*Berberis thunbergii*), spicebush (*Lindera benzoin*), and highbush blueberry (*Vaccinium corymbosum*). Herbaceous species included sensitive fern (*Onoclea sensibilis*), wool grass (*Scirpus cyperinus*), and grass-leaved goldenrod (*Euthamia graminifolia*).

In the area of wetland BW1 within hay fields, plants consisted of mixed forbs and grasses, including upland and wetland species, such as timothy hay (*Phleum subulatum*) and fox sedge (*Carex vulpinoidea*). Vegetation observed during field investigations also did not demonstrate a predominance of hydrophytic vegetation, as hydrophytic species did not comprise greater than 50 percent of the dominant species across all strata. Note that the farm field area is actively mowed as part of continuous agricultural management activities.

## Jurisdictional Evaluation

The ±0.51 acre portion of the ±9.9 acre wetland BW1 that is located within the actively managed southern farm field does not display a continuous surface connection to a relatively permanent water.

As shown in the hillshade mapping (Figure 3), linear earthen berms are present along the forested edge of the southern farm field at the interface with the adjacent forested wetland. These berms consist of earthen material and accumulated woody vegetation and form a continuous, elevated feature separating the actively maintained agricultural farm field from the adjoining forested area. Based on observations during the delineation effort, the farm field wetland does not physically abut the adjacent forested wetland and does not maintain a continuous surface water connection across the berm feature.

Accordingly, the delineated wetland within the southern farm field is separate from other jurisdictional waters and does not exhibit the continuous surface water connection required to be considered an adjacent wetland under 33 C.F.R. § 328.3 (c)(2) (2023).

## Wetland BW2

Wetland BW2 is a ±0.54 acre emergent wetland depression to the west of wetland BW4. It is located entirely within a farm field between a tree line to the west and a berm on a field edge to the east.

## Soils

Wetland BW2 was delineated within well drained series including Woodbridge and Paxton. Soils described in this portion of wetland BW2 resemble the Ridgebury series, which the NRCS Soil Survey lists as a minor component of this map unit. Based on a review of aerial imagery, wetland BW2 has been continuously managed as a hay field since at least 1934; therefore, the soils in this wetland have been repeatedly disturbed through plowing, grading, and other agricultural practices, resulting in altered soil structure and hydrologic function.

## Hydrology

Located within the Ekonk Brook subregional watershed, wetland BW2 is in a small, depressional area that collects runoff from the surrounding areas. A small berm exists between wetland BW2 and wetland BW4; seepage from the western portion of wetland BW4 may also contribute to wetland BW2. During field investigations, no evidence of water connectivity to adjacent wetlands were observed around the perimeter of wetland BW2.

## Vegetation

Wetland BW2 is dominated by orchard grass (*Dactylis glomerata*), Timothy hay, reed canary grass (*Phalaris arundinacea*), sensitive fern, and bedstraw (*Galium triflorum*). Note that the farm field area is actively mowed as part of continuous agricultural management activities. Vegetation observed during field investigations also did not demonstrate a predominance of hydrophytic vegetation, as hydrophytic species did not comprise greater than 50 percent of the dominant species across all strata.

## Jurisdictional Evaluation

Wetland BW2 is an isolated depressional wetland feature in an actively managed farm field that does not exhibit the continuous surface water connection required to be considered an adjacent wetland under 33 C.F.R. § 328.3 (c)(2) (2023).

## Wetland BW3

Wetland BW3 is a ±0.06 acre scrub-shrub wetland to the north of wetland BW3. It is located within the agricultural field, adjacent to a forested area in the northwestern portion of the site. An intermittent stream does extend from the western border of wetland BW3 to the adjacent forested wetland BW1.

## Soils

Soils within wetland BW3 are formed in dense lodgement till, and slopes range from 3 to 8 percent. The NRCS Soil Survey represents the area as Paxton and Montauk fine sandy loams. Like wetland BW1, dissimilar components were encountered that reflect a seepage wetland formed through groundwater discharge. The soil in wetland BW3 meets the criteria for Typic Endoaquepts.

## Hydrology

This wetland receives water from an excavated drainage ditch that flows from the south, and from sheet flow during rain events from the field to the east. Hydrology is supported by a shallow densic contact that restricts groundwater infiltration. Water discharges from this wetland down a steep slope to the west, where an erosional scour feature is present. This feature does not convey water during normal climactic conditions and only supports seasonal and rain event drainage from the adjacent farm fields. It is not identified on current and historic USGS Topographic mapping, or federal hydrography dataset, and is not mapped as a riverine system by the NWI.

## Vegetation

The shrub stratum is occupied by black raspberry (*Rubus occidentalis*), multiflora rose (*Rosa multiflora*), autumn olive (*Elaeagnus umbellata*), and border privet (*Ligustrum obtusifolium*).

Dominant herbaceous species include wrinkle-leaved goldenrod (*Solidago rugosa*), fox sedge (*Carex vulpinoidea*), and sallow sedge (*Carex lurida*).

The farm field portion of Wetland BW3 is dominated by Timothy hay and is actively mowed as part of continuous agricultural management activities. Vegetation observed during field investigations also did not demonstrate a predominance of hydrophytic vegetation, as hydrophytic species did not comprise greater than 50 percent of the dominant species across all strata.

### Jurisdictional Evaluation

Wetland BW3 lacks a semi-permanent surface water connection to adjacent waters, which was observed to convey flow seasonally and in direct response to precipitation, and does not exhibit a sustained flow, defined bank or ordinary high water mark indicators to establish a relatively permanent surface connection. Wetland BW3 is not considered an adjacent wetland under 33 C.F.R. § 328.3 (c)(2) (2023).

### Wetland BW4

Wetland BW4 is a broad mixed-class wetland complex consisting of forested, scrub shrub, and farm fields, encompassing an area of ±82.23 acres. Most of this wetland is located within the Ekonk Brook subregional watershed, with a minor eastern portion located within the Moosup River subregional watershed. Intermittent tributaries to Ekonk Brook (located 0.35 miles from the southeastern property boundary) flow northwest through the northern, forested portion of the wetland.

The mixed class wetlands are dominated by a forested cover type but contain hay fields and display recent logging activity. Shrub swamps and early successional forest cover exist where logging has taken place. Portions of these wetlands have been filled with stones, boulders, and large woody debris. The fill areas that lack hydrophytic vegetation and show no evidence of hydrology on or within the soil surface were delineated as upland.

### Soils

These wetlands contain multiple soil types derived from glacial till parent material. The NRCS Soil Survey identifies the majority of the forested portion of wetland BW4 as Ridgebury, Leicester, and Whitman soils, 0 to 8 percent slopes (3) map unit, with Woodbridge fine sandy loam, 0 to 8 percent slopes, very stony (46B) also present.

The southeastern portion of these wetlands are actively managed as hay fields. The hay fields are mapped as Paxton and Montauk fine sandy loams (84C and 84D). Soils described within this portion of these wetlands resemble the Ridgebury series, which is included by the NRCS Soil Survey as a minor component of this map unit.

The western edge of these wetlands was delineated at the interface of Ridgebury/Whitman soils and geographically associated well drained series, including Woodbridge and Paxton. Field observations of very poorly and poorly drained soil in this area are consistent with the NRCS Soil Survey map units.

### Hydrology

Wetland hydrology is supported by groundwater discharge, surface runoff, and direct precipitation. Most of this wetland is located within the Ekonk Brook subregional watershed, with

a minor eastern portion located within the Moosup River subregional watershed. Portions of the eastern forested wetlands abut a perennial stream, while portions of the western forested wetlands abut a braided intermittent stream, portions of which are encised on a steep slope.

The western portion of wetland BW4 ultimately drains to Ekonk Brook via two intermittent watercourses identified within the forested portions of wetland BW4. The farm field wetlands display modified hydrology consistent with the facilitation of agrarian use. A spring/surface seep was observed in the southern portion of these wetlands. Two constructed drainage ditches divert the flow of this seep west, which recharges portions of the hay fields in the western portion of the parcel.

The farm field portion of wetland BW4 is separated from the adjacent forested wetland system by a network of established earthen berms that extend  $\pm 5,000$  linear feet along the interface of the forested wetlands and the agricultural farm fields. These features are continuous and consist of accumulated woody vegetative material, shrubs, saplings, root masses, and decomposed organic matter forming slightly elevated, well-drained linear landscape features. The features interrupt sheet flow between the farm field wetlands and the forested wetlands and exhibit no evidence of defined surface water conveyance or hydrologic indicators demonstrating a continuous surface water connection.

## Vegetation

The northwestern portion of wetland BW4 is dominated by red maple, with a shrub stratum composed of witch hazel. Dominant herbaceous species include Massachusetts fern (*Parathelypteris simulata*) and steeplebush (*Spiraea tomentosa*); roundleaf greenbrier (*Smilax rotundifolia*) is common in the understory.

The eastern portion of wetland BW4 contains forested swamps dominated by red maple, and a shrub stratum including Japanese barberry and black raspberry. Dominant herbaceous species include Jewelweed (*Impatiens capensis*) and sensitive fern, with Christmas fern (*Polystichum acrostichoides*), horsetail (*Equisetum* spp.), and sallow sedge.

The southern forested portion of wetland BW4 is characterized by an American hornbeam-dominated canopy with an understory dominated by Japanese barberry and Virginia creeper (*Parthenocissus quinquefolia*). Emergent wetland areas in the central portion of wetland BW4 are dominated by woolgrass (*Scirpus cyperinus*) and wrinkle-leaved goldenrod, with occurrences of tearthumb (*Persicaria sagittata*), narrowleaf goldenrod, autumn olive, and fox grape (*Vitis labrusca*).

Emergent wetland areas in the southwestern portion of wetland BW4 are dominated by sensitive fern, wrinkle-leaved goldenrod, and scattered patches of reed canary grass, fox grape, and bedstraw (*Galium triflorum*).

The portions of wetland BW4 located within the actively managed agricultural farm fields are dominated by orchard grass (*Dactylis glomerata*), Timothy hay, reed canary grass (*Phalaris arundinacea*), sensitive fern, and bedstraw (*Galium triflorum*). These areas have been historically altered and continue to be actively managed for agricultural production. Field investigations confirmed that the vegetation does not meet the hydrophytic vegetation criterion, as hydrophytic species comprise less than 50 percent of the dominant species within each stratum.

## Jurisdictional Evaluation

The portions of wetland BW4 within the farm fields (collectively totaling ±13.16 acres of the ±82.23 acre wetland complex) are separate from adjacent jurisdictional waters and do not exhibit the continuous surface water connection required to be considered an adjacent wetland under 33 C.F.R. § 328.3 (c)(2) (2023).

## Wetland BW4b

Wetland BW4b ±0.38 acre, primarily emergent wetland in the southwestern portion of an agricultural field abutting a tree line.

### Soils

Wetland BW4b mapped as Paxton and Montauk fine sandy loams (84C and 84D). Soils described within this portion of wetland BW4b resemble the Ridgebury series, which is included by the NRCS Soil Survey as a minor component of this map unit.

### Hydrology

Located in the Ekonk Brook subregional watershed, wetland BW4b is supported by groundwater discharge, surface flow, and direct precipitation. An earthen berm is located along the western and southern boundaries of this farm field wetland, and no evidence of water discharge or drainage from the wetland was observed during field investigations.

### Vegetation

Vegetation in wetland BW4b is dominated by herbaceous species, such as wrinkle-leaved goldenrod, sensitive fern, and woolgrass, with a hardwood canopy comprised red maple along the south and west boundaries. These areas have been historically altered and continue to be actively managed for agricultural production. Field investigations confirmed that the vegetation does not meet the hydrophytic vegetation criterion, as hydrophytic species comprise less than 50 percent of the dominant species within each stratum.

## Jurisdictional Evaluation

Wetland BW4bis an isolated depressional wetland feature in an actively managed farm field that does not exhibit the continuous surface water connection required to be considered an adjacent wetland under 33 C.F.R. § 328.3 (c)(2) (2023).

## Conclusion

VHB scientists investigated the ±255-acre site in Plainfield (Moosup), Connecticut, and identified five wetlands onsite totaling ±93.11 acres of wetlands. Of that total, ±14.6 acres of these wetlands are state jurisdictional active farm field wetlands and isolated depressional wetlands, whereas ±78.5 acres are primarily forested state and federally jurisdictional.



# 3

## References

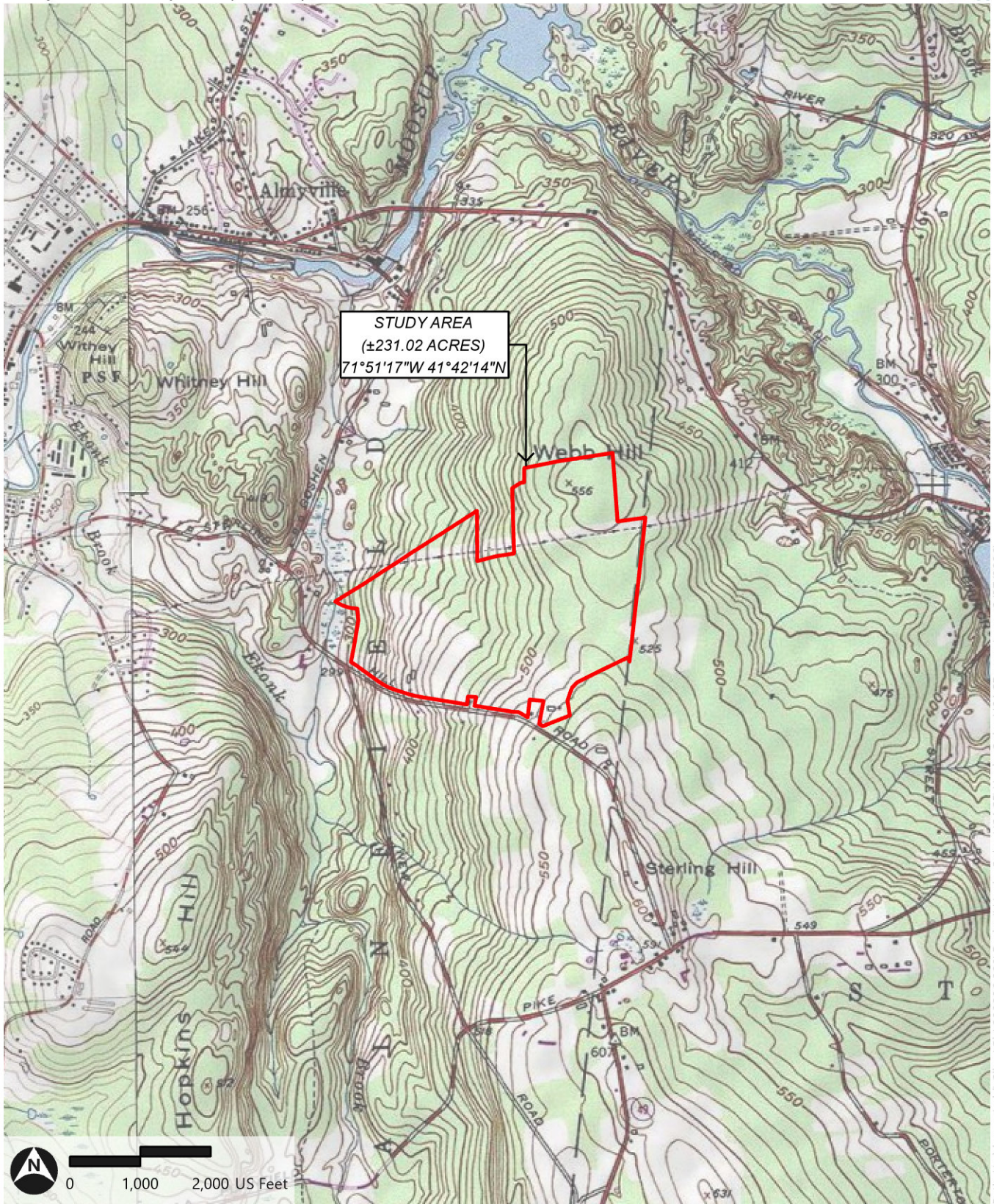
- Brinson, M.M. 1993. A Hydrogeomorphic Classification for Wetlands. Tech. Rpt.WRP-DE-4, U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS.
- §22a-38 CGS. Connecticut General Statutes Title 22a, Chapter 440, Section 22a-38 – Wetlands and Watercourses Definitions.
- Cowardin, L.M., V. Carter, F.C. Golet and E.T. LaRoe, 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Fish and Wildlife Service. Washington, D.C. FWS/OBS-79/31.
- FEMA. Federal Emergency Management Administration Flood Map Service Center, 2024. Available online at <https://msc.fema.gov/portal/home>.
- Natural Resources Conservation Service (NRCS), United States Department of Agriculture (USDA), 2019. Web Soil Survey. Available online at <http://websoilsurvey.nrcs.usda.gov/>.
- National Drought Mitigation Center (NDMC), USDA, and National Oceanographic and Atmospheric Administration, 2024. Drought Monitor Map. Available online at <https://droughtmonitor.unl.edu/Maps/MapArchive.aspx>
- University of Connecticut (UConn) Connecticut Environmental Conditions (CT ECO) Map Catalog. Internet site: [https://cteco.uconn.edu/map\\_catalog.asp?town=109#mapcat](https://cteco.uconn.edu/map_catalog.asp?town=109#mapcat)
- USACE and United States Environmental Protection Agency (EPA). Revised Definition of "Waters of the United States." 88 Fed. Reg. 3,004 (January 18, 2023)
- USACE, 2012. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeastern Region (Version 2.0), ed. J.S. Wakely, R.W. Lichvar, C.V. Noble. ERDC/EL TR-12-1. Vicksburg, MS: United States Army Engineer Research and Development Center.
- USFWS, 2021. National Wetlands Inventory (NWI) website. United States Department of the Interior (USDOI), Fish and Wildlife Service (FWS), Washington, D.C. <http://www.fws.gov/wetlands/>



# Figures

# Figure 1: USGS Site Location Map

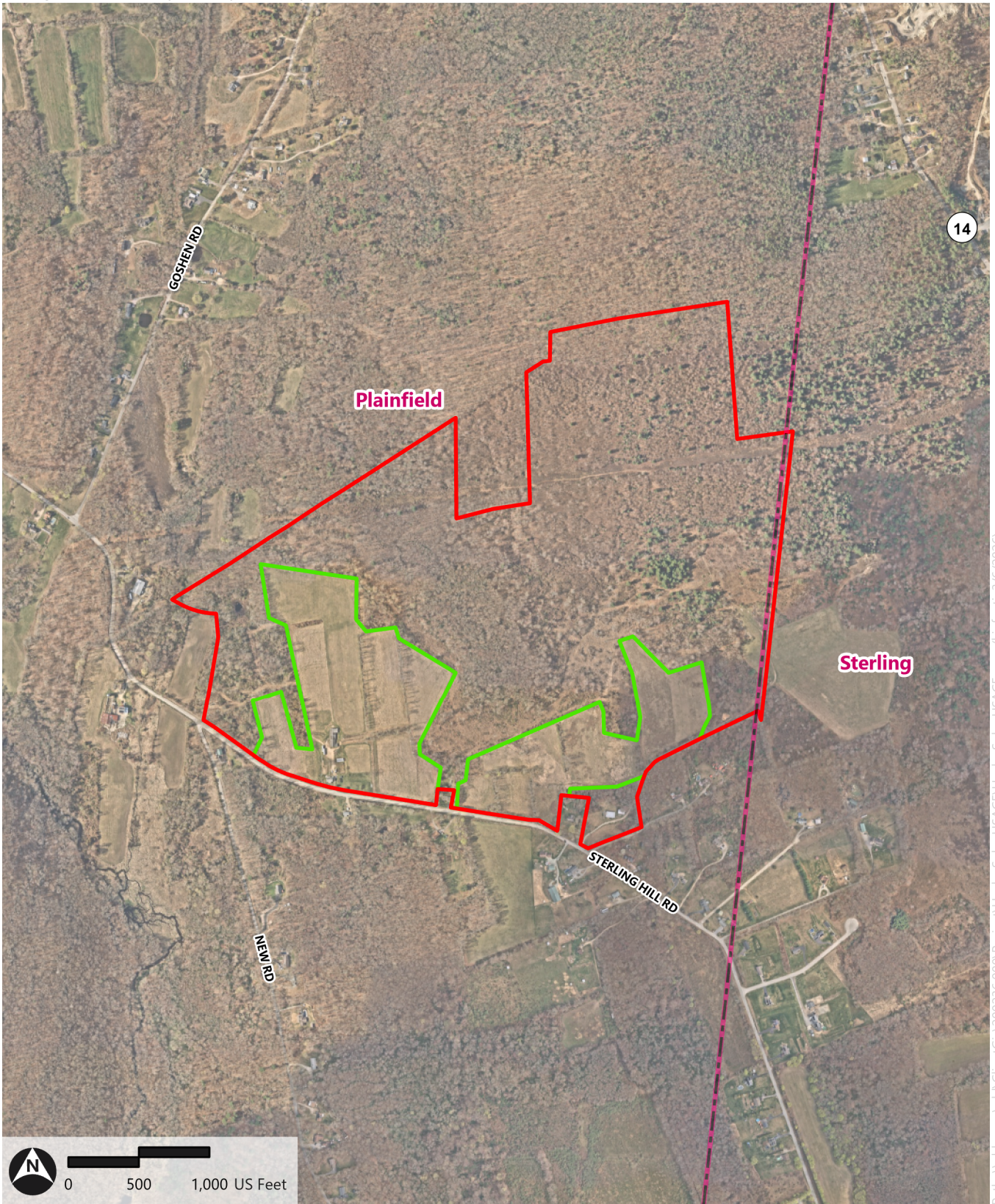
Husky Land Development | Moosup, Connecticut



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## Figure 2: Aerial Map

Husky Land Development | Moosup, Connecticut

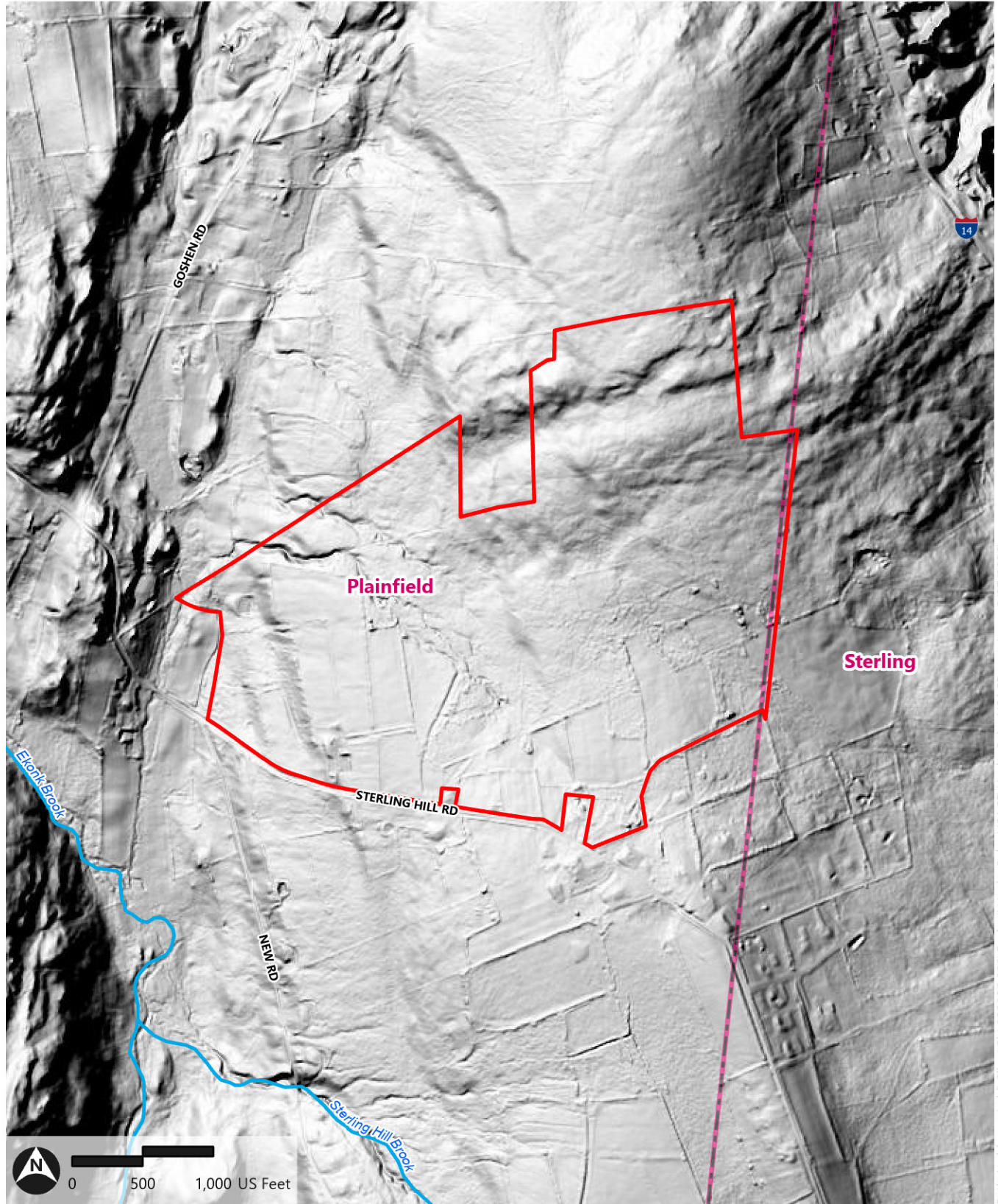


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- Project Parcel
- Town Boundary
- Farm Field Boundary - 2025

### Figure 3: Hillshade Map

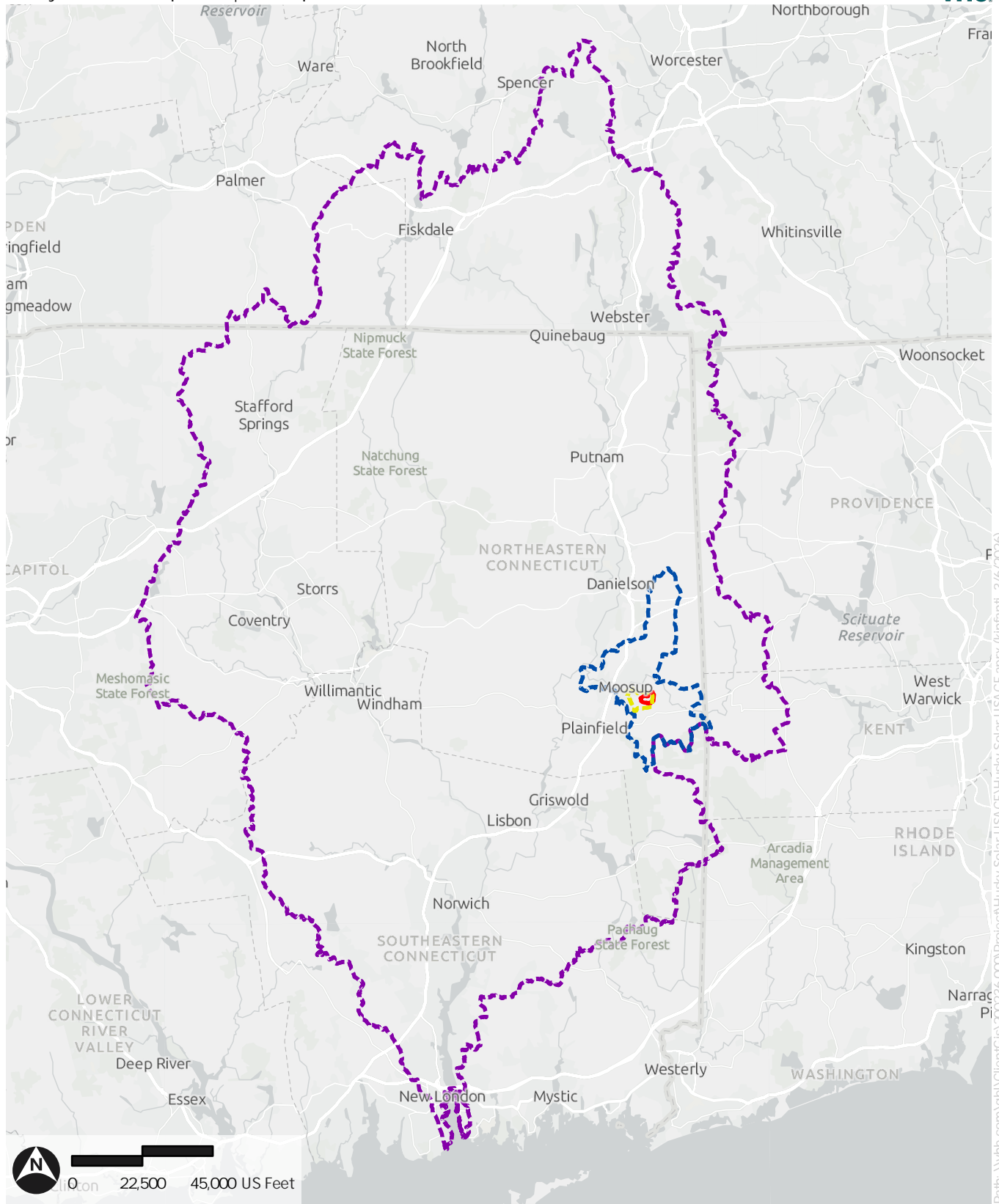
Husky Land Development | Moosup, Connecticut



- Project Parcel
- Named Waterbody Line
- Town Boundary

Figure 4: Watershed Map

Husky Land Development | Moosup, Connecticut



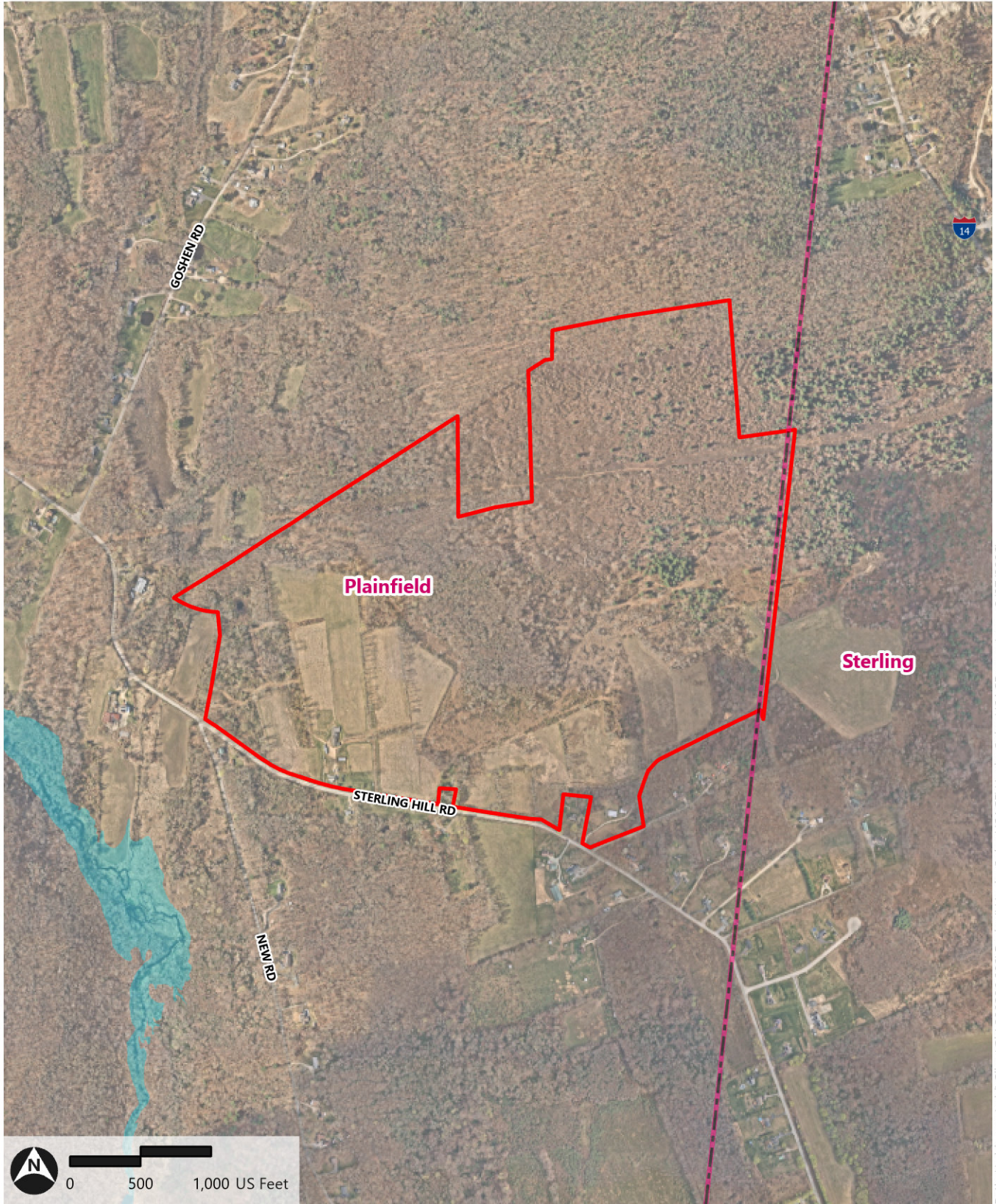
- Project Parcel
- Ekonk Brook Subregional Basin
- Thames River Major Drainage Basin
- Lower Moosup River HUC 12 Subwatershed

Source: VHB, ESRI, CTDEEP, CTDOT

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# Figure 5: FEMA Map

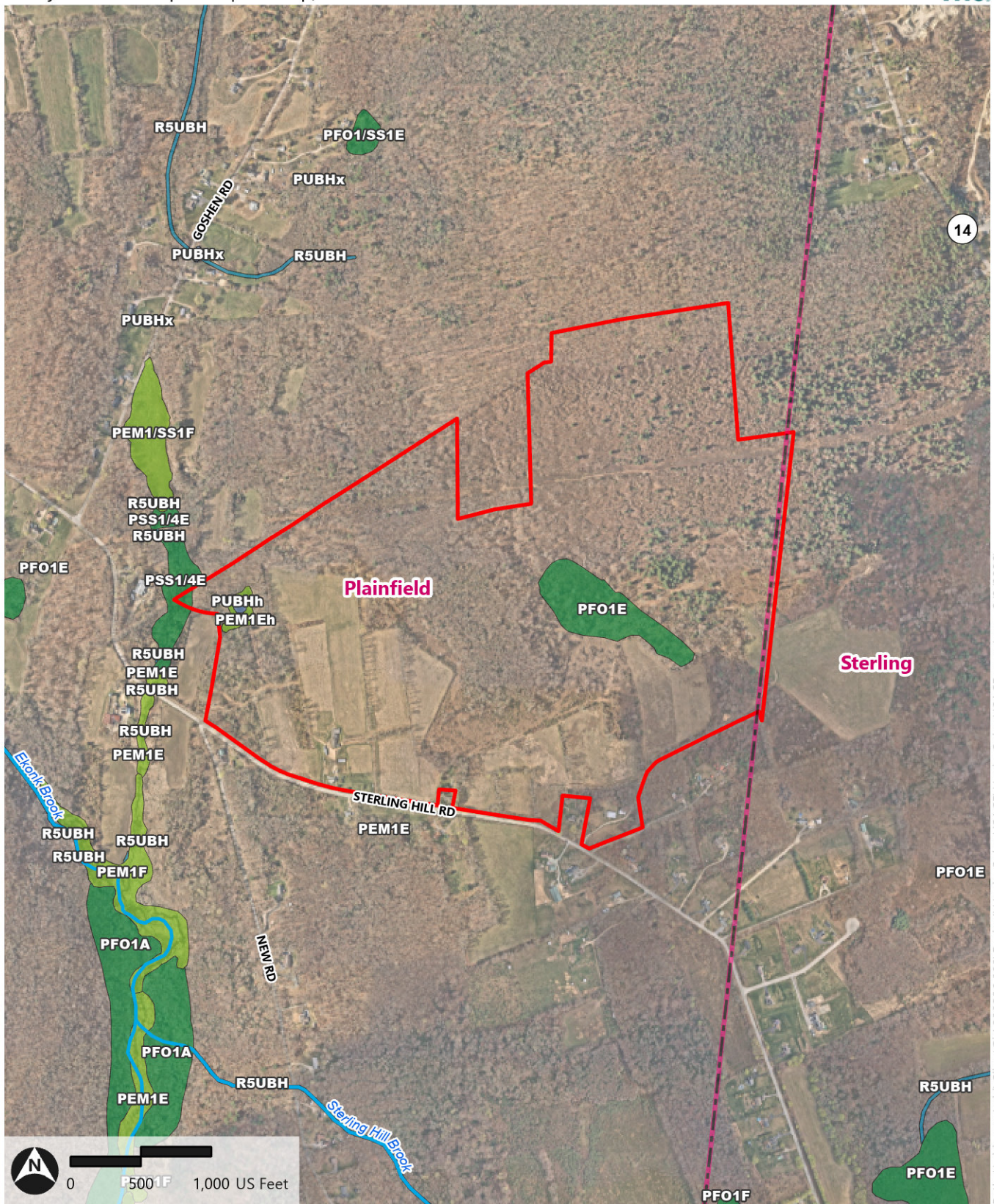
Husky Land Development | Moosup, Connecticut



- Project Parcel
- Town Boundary
- 1% Annual Chance Flood Hazard
- FEMA Flood Hazard Zones**

### Figure 6: National Wetlands Inventory Map

Husky Land Development | Moosup, Connecticut



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# Custom Soil Resource Report Soil Map



Map Scale: 1:9,200 if printed on A landscape (11" x 8.5") sheet.




Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 19N WGS84



### MAP LEGEND


**Area of Interest (AOI)**

 Area of Interest (AOI)




















**Soils**







 Soil Map Unit Polygons

 Soil Map Unit Lines


 Soil Map Unit Points

**Special Point Features**






-  Blowout
-  Borrow Pit
-  Clay Spot
-  Closed Depression
-  Gravel Pit
-  Gravelly Spot
-  Landfill
-  Lava Flow
-  Marsh or swamp
-  Mine or Quarry
-  Miscellaneous Water
-  Perennial Water
-  Rock Outcrop
-  Saline Spot
-  Sandy Spot
-  Severely Eroded Spot
-  Sinkhole
-  Slide or Slip
-  Sodic Spot

-  Spoil Area
-  Stony Spot
-  Very Stony Spot
-  Wet Spot
-  Other
-  Special Line Features

**Water Features**

 Streams and Canals

**Transportation**

-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads

**Background**

 Aerial Photography

### MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:12,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service  
 Web Soil Survey URL:  
 Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: State of Connecticut, Eastern Part  
 Survey Area Data: Version 6, Sep 16, 2025

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jun 14, 2022—Jul 1, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

## Map Unit Legend

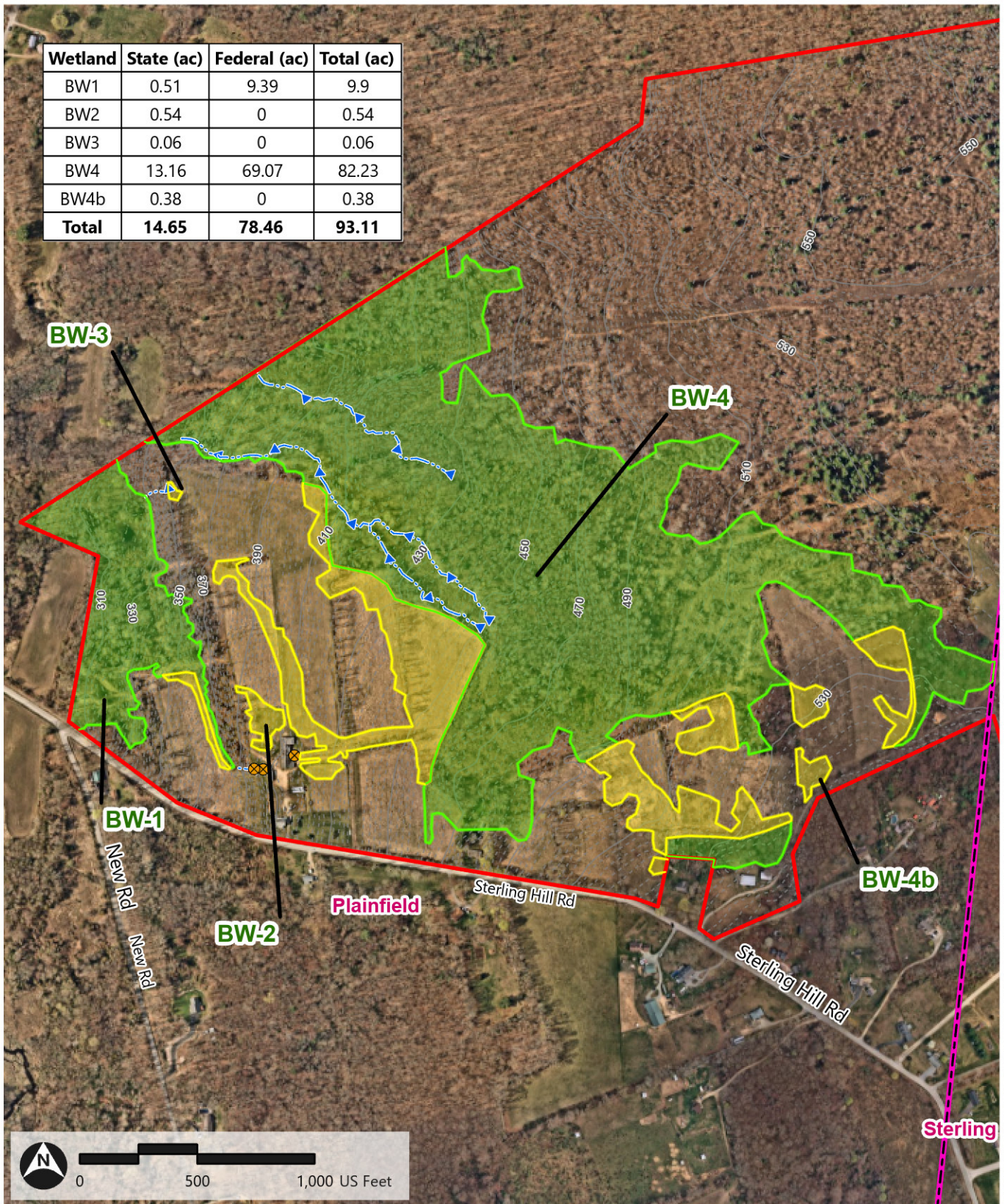
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
3	Ridgebury, Leicester, and Whitman soils, 0 to 8 percent slopes, extremely stony	35.7	16.4%
23A	Sudbury sandy loam, 0 to 5 percent slopes	1.0	0.4%
45A	Woodbridge fine sandy loam, 0 to 3 percent slopes	6.4	2.9%
45B	Woodbridge fine sandy loam, 3 to 8 percent slopes	5.5	2.5%
45C	Woodbridge fine sandy loam, 8 to 15 percent slopes	11.1	5.1%
46B	Woodbridge fine sandy loam, 0 to 8 percent slopes, very stony	13.8	6.3%
46C	Woodbridge fine sandy loam, 8 to 15 percent slopes, very stony	10.6	4.9%
47C	Woodbridge fine sandy loam, 3 to 15 percent slopes, extremely stony	28.1	12.9%
61B	Canton and Charlton fine sandy loams, 0 to 8 percent slopes, very stony	16.6	7.7%
62C	Canton and Charlton fine sandy loams, 3 to 15 percent slopes, extremely stony	24.8	11.4%
62D	Canton and Charlton fine sandy loams, 15 to 35 percent slopes, extremely stony	0.6	0.3%
73C	Charlton-Chatfield complex, 0 to 15 percent slopes, very rocky	6.3	2.9%
84B	Paxton and Montauk fine sandy loams, 3 to 8 percent slopes	26.1	12.0%
84C	Paxton and Montauk fine sandy loams, 8 to 15 percent slopes	12.3	5.7%
84D	Paxton and Montauk fine sandy loams, 15 to 25 percent slopes	3.5	1.6%
85B	Paxton and Montauk fine sandy loams, 3 to 8 percent slopes, very stony	10.5	4.8%
86D	Paxton and Montauk fine sandy loams, 15 to 35 percent slopes, extremely stony	4.7	2.2%
103	Rippowam fine sandy loam	0.0	0.0%
<b>Totals for Area of Interest</b>		<b>217.5</b>	<b>100.0%</b>

**Figure 8: Wetland and Watercourse Delineation Map**

Husky Land Development | Plainfield, CT



Wetland	State (ac)	Federal (ac)	Total (ac)
BW1	0.51	9.39	9.9
BW2	0.54	0	0.54
BW3	0.06	0	0.06
BW4	13.16	69.07	82.23
BW4b	0.38	0	0.38
<b>Total</b>	<b>14.65</b>	<b>78.46</b>	<b>93.11</b>



- Bellavance Property (255 acres)
- Federal Wetland Area
- State Wetland Area
- Town Boundary
- X Culvert
- ▶ Intermittent Stream
- ▶ Approximate Stream Location
- 2 ft Contour
- 10 ft Contour

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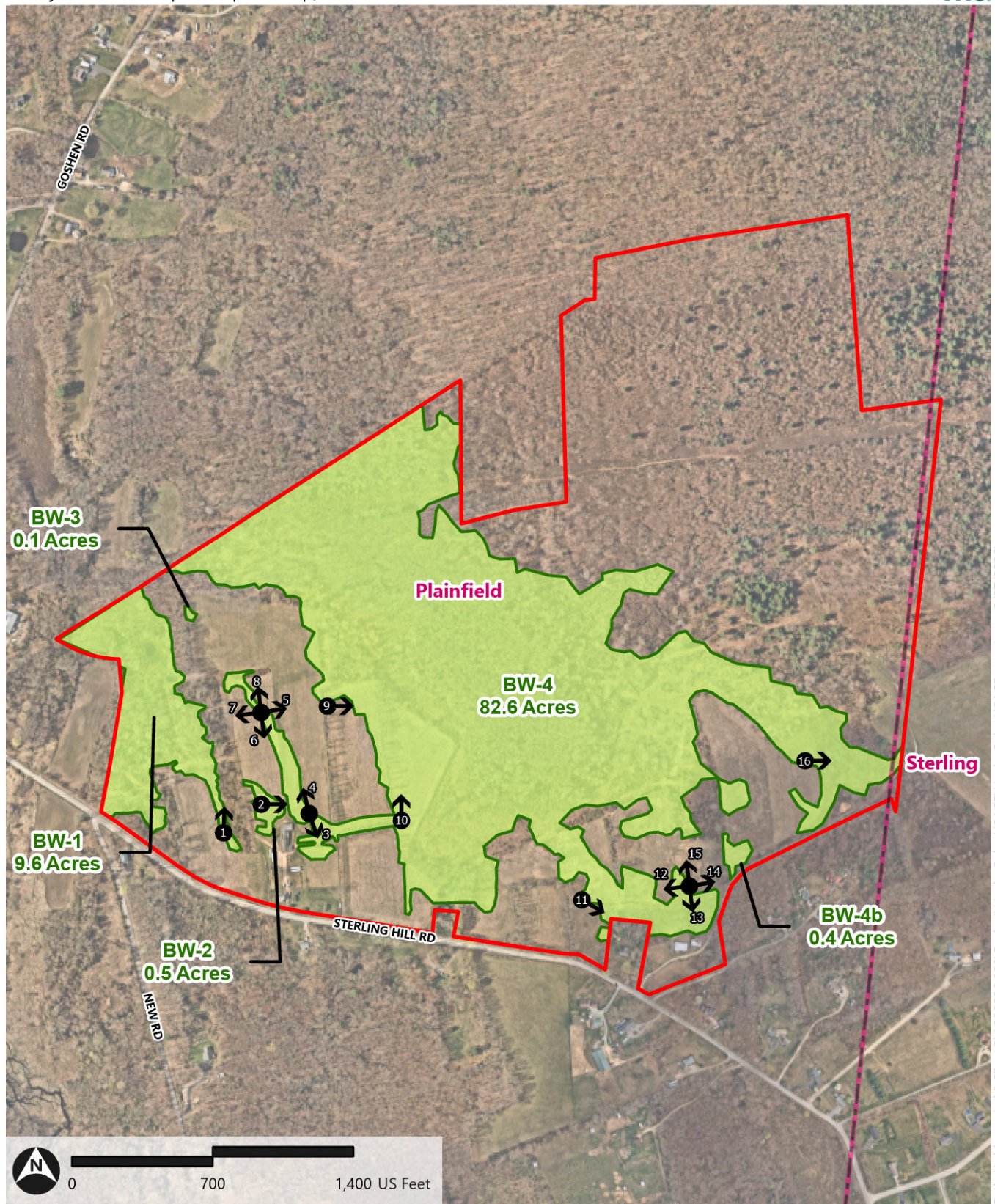


# A

## Site Photograph Log

### Figure 1: Photo Location Map

Husky Land Development | Moosup, Connecticut



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- Photo Location
- Project Parcel
- Town Boundary
- Delineated Wetland Edge
- Delineated Wetland

## Appendix A - Site Photograph Log



Photo 1 – Facing north, a view of the agricultural farm field portion of wetland 1, adjacent to the forested portion in the background of the picture.



Photo 2 – Facing east, a view of wetland 2 within an active agricultural field.

## Appendix A - Site Photograph Log



Photo 3 – Facing southeast, a view of wetland 4 within an active agricultural field.



Photo 4 – Facing north along the eastern boundary of this spur of wetland 4. The active agricultural field has recently been mowed.

## Appendix A - Site Photograph Log



Photo 5 – Facing east, a view of the active agricultural field from within this spur of wetland 4.



Photo 6 – Facing south, a view of the active agricultural field from within this spur of wetland 4.

## Appendix A - Site Photograph Log



Photo 7 – Facing west, a view of the active agricultural field from within this spur of wetland 4.



Photo 8 – Facing north, a view of the active agricultural field from within this spur of wetland 4.

## Appendix A - Site Photograph Log



Photo 9 – Facing east, a view of the northern agricultural farm field adjacent to the forested wetlands. The perimeter berm is in the back left portion of the picture.



Photo 10 – Facing north, a view of a portion of wetland 1 that is located within an active agricultural farm field.



Photo 11 – Facing east, a view of wetland 4 along the forested edge. The farm field has been recently mowed.

**U.S. Army Corps of Engineers (USACE)**

**RIGHT OF ENTRY**

For use of this form, see Section 404 of the Clean Water Act, Section 10 of the Rivers and Harbors Act of 1899, and Section 103 of the Marine Protection, Research, and Sanctuaries Act, the proponent agency is CECW-COR.

*Form Approved -  
OMB No. 0710-0003  
Expires 2027-10-31*

**The Agency Disclosure Notice (ADN)**

The Public reporting burden for this collection of information, 0710-003, is estimated to average 5 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or burden reduction suggestions to the Department of Defense, Washington Headquarters Services, at [whs.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil](mailto:whs.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil). Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.

**Purpose:** This form is used by members of the public to authorize the USACE to enter their property for site investigations relating to USACE project reviews. These reviews include onsite investigations needed to support application review, processing, and issuance of a Clean Water Act and/or Rivers and Harbors Act delineations, determinations, and/or permits.

This form is a component in the Corps Regulatory Request System (RRS), which is an online permitting application portal for the Regulatory Program.

**ITEMS 1 THRU 3 - FOR USACE USE ONLY**

1. APPLICATION NO.	2. FIELD OFFICE CODE	3. DATE RECEIVED
--------------------	----------------------	------------------

**ITEMS 4 THRU 12 - COMPLETD BY THE PROPERTY OWNER**

4. PROPERTY OWNER NAME ( <i>first, middle, last</i> ) Bellavance Farm, LLC	5. PROPERTY OWNER ADDRESS: c/o Thomas Bellavance, 318 Sterling Hill Rd	
Company: Bellavance Farm, LLC	City: Moosup	State: CT
E-mail Address: <i>tbellavance@sbcglobal.net</i>	ZIP: 06354	Country: USA

6. PROPERTY OWNER PHONE NUMBERS. w/AREA CODE		
a. Residence <i>860-564-5717</i>	b. Business <i>860-564-4524</i>	c. Fax

**LOCATION AND LEGAL DESCRIPTION OF PROPERTY**

7. PROJECT STREET ADDRESS ( <i>if applicable</i> )				8. LOCATION OF PROPERTY ( <i>in decimal degrees</i> )	
Address 318 Sterling Hill Rd	City: Moosup	State: CT	ZIP: 06354	Latitude: °N 41.7004357	Longitude: °W 71.8597673

9. TAX PARCEL ID(s) 031-0061-0003
--------------------------------------

10. PROPERTY OWNER CERTIFICATION  
By signing below, I authorize representatives of the USACE to enter upon the property described above for the purpose of conducting on-site investigations, if necessary, and issuing a jurisdictional determination pursuant to Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act of 1899. I, the undersigned, am a duly authorized owner of record of the property identified herein.

11. SIGNATURE OF PROPERTY OWNER <i>Thomas Bellavance</i>	12. DATE <i>2/26/2026</i>
---	------------------------------

18 U.S.C. Section 1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up any trick, scheme, or disguises a material fact or makes any false, fictitious or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statements or entry, shall be fined not more than \$10,000 or imprisoned not more than five years or both.

U.S. Army Corps of Engineers (USACE)  
**AUTHORIZATION TO ACT AS AN AGENT**

For use of this form, see Section 404 of the Clean Water Act, Section 10 of the Rivers and Harbors Act of 1899, and Section 103 of the Marine Protection, Research, and Sanctuaries Act, the proponent agency is CECW-COR.

*Form Approved -  
 OMB No. 0710-0003  
 Expires 2027-10-31*

**The Agency Disclosure Notice (ADN)**

The Public reporting burden for this collection of information, 0710-003, is estimated to average 5 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or burden reduction suggestions to the Department of Defense, Washington Headquarters Services, at [wbs.mc-alex.asd.mbx.dd-dcd-information-collections@mail.mil](mailto:wbs.mc-alex.asd.mbx.dd-dcd-information-collections@mail.mil). Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.

**Purpose:** This form is used by members of the public to authorize an agent (for example - a private consultant) to act on their behalf in all matters relating to all dealings with the USACE regarding the project. This includes taking all necessary actions for the application, processing, issuance, and/or acceptance of a Clean Water Act and/or Rivers and Harbors Act delineations, determinations, and/or permits.

This form is a component in the Corps Regulatory Request System (RRS), which is an online permitting application portal for the Regulatory Program.

**ITEMS 1 THRU 3 - FOR USACE USE ONLY**

1. APPLICATION NO.	2. FIELD OFFICE CODE	3. DATE RECEIVED

**ITEMS 4 THRU 14 - COMPLETED BY THE APPLICANT or REQUESTOR**

4. PROJECT NAME Husky Land Development		5. PROJECT LOCATION 318 Sterling Hill Rd, Moosup CT 06354	
6. APPLICANT NAME (first, middle, last) Ian Gottheim, PE		7. AGENT NAME Megan B Raymond	
Company (if applicable): VCP Pledgor 4, LLC		Company: VHB	
E-mail Address: IGottheim@Verogy.com		E-mail Address: MRaymond@VHB.com	
8. APPLICANT ADDRESS (if applicable)		9. AGENT ADDRESS (if applicable)	
Address 124 LaSalle Road, 2nd Floor		Address 100 Great Meadow Road, Suite 200	
City: West Hartford	State: CT	City: Wethersfield	State: CT
10. APPLICANT PHONE NUMBERS. w/AREA CODE		11. AGENT PHONE NUMBERS. w/AREA CODE	
a. Residence -	b. Business 201.906.2950	c. Fax -	
		a. Residence -	b. Business 860.266.2311
		c. Fax -	

**12. APPLICANT/AGENT CERTIFICATION**

By signing below, I hereby authorize the agent listed above, to act on my behalf in all matters relating to all dealings with the USACE regarding the project and properties listed above, including taking all necessary actions for the application, processing, issuance, and/or acceptance of a Clean Water Act and/or Rivers and Harbors Act delineations, determinations, and/or permits. Any and all acts carried out by my agent on my behalf as it relates to this project and property shall have the same effect as acts of my own.

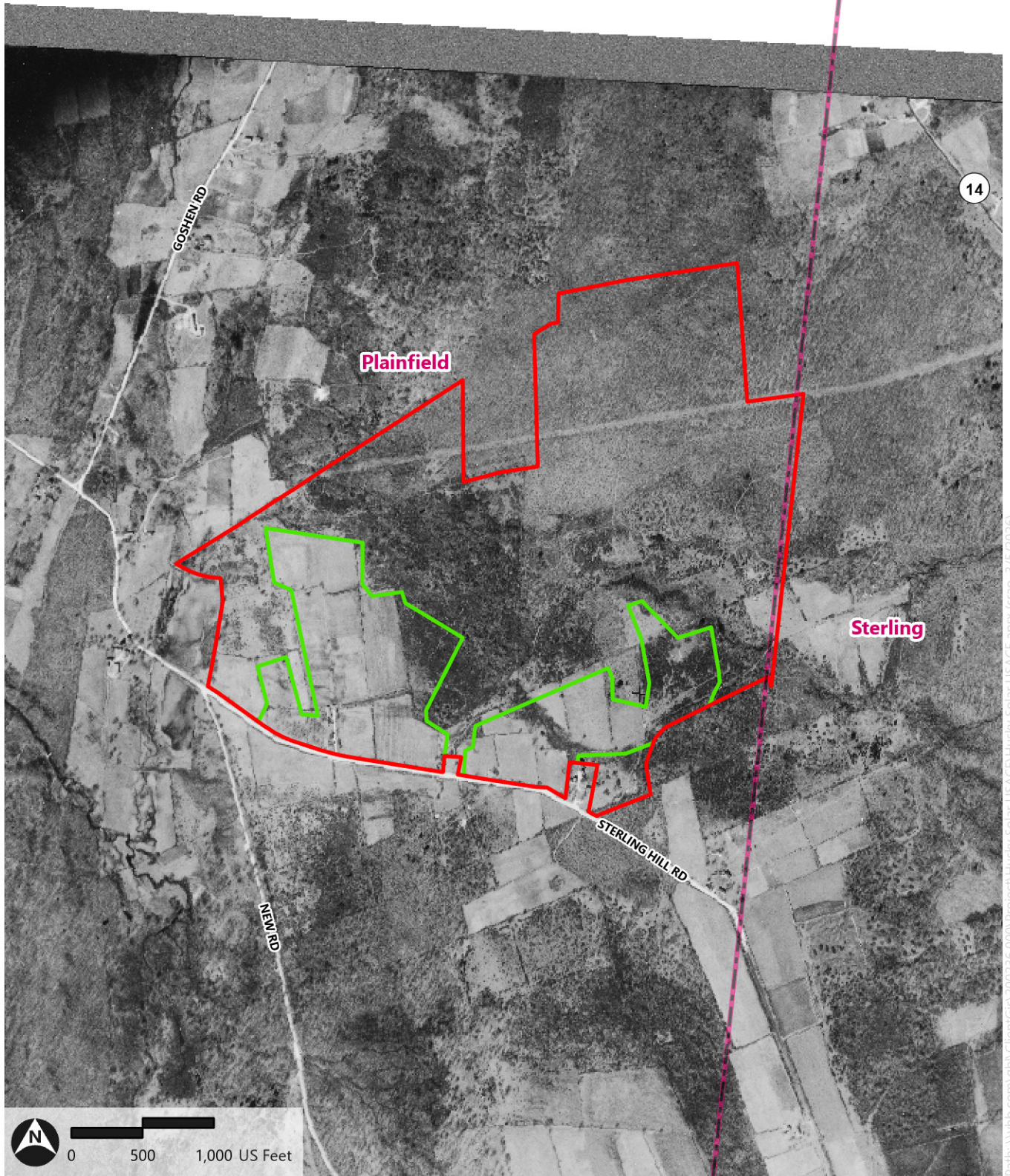
I agree to review all information submitted to the USACE on my behalf by my agent and certify that any information submitted on my behalf is true and correct.

13. SIGNATURE of APPLICANT or REQUESTOR Ian Gottheim	14. DATE 2026-02-26
---	------------------------

18 U.S.C. Section 1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up any trick, scheme, or disguises a material fact or makes any false, fictitious or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statements or entry, shall be fined not more than \$10,000 or imprisoned not more than five years or both.

# Figure 1-1: Historic Aerial Map - 1934

Husky Land Development | Moosup, Connecticut



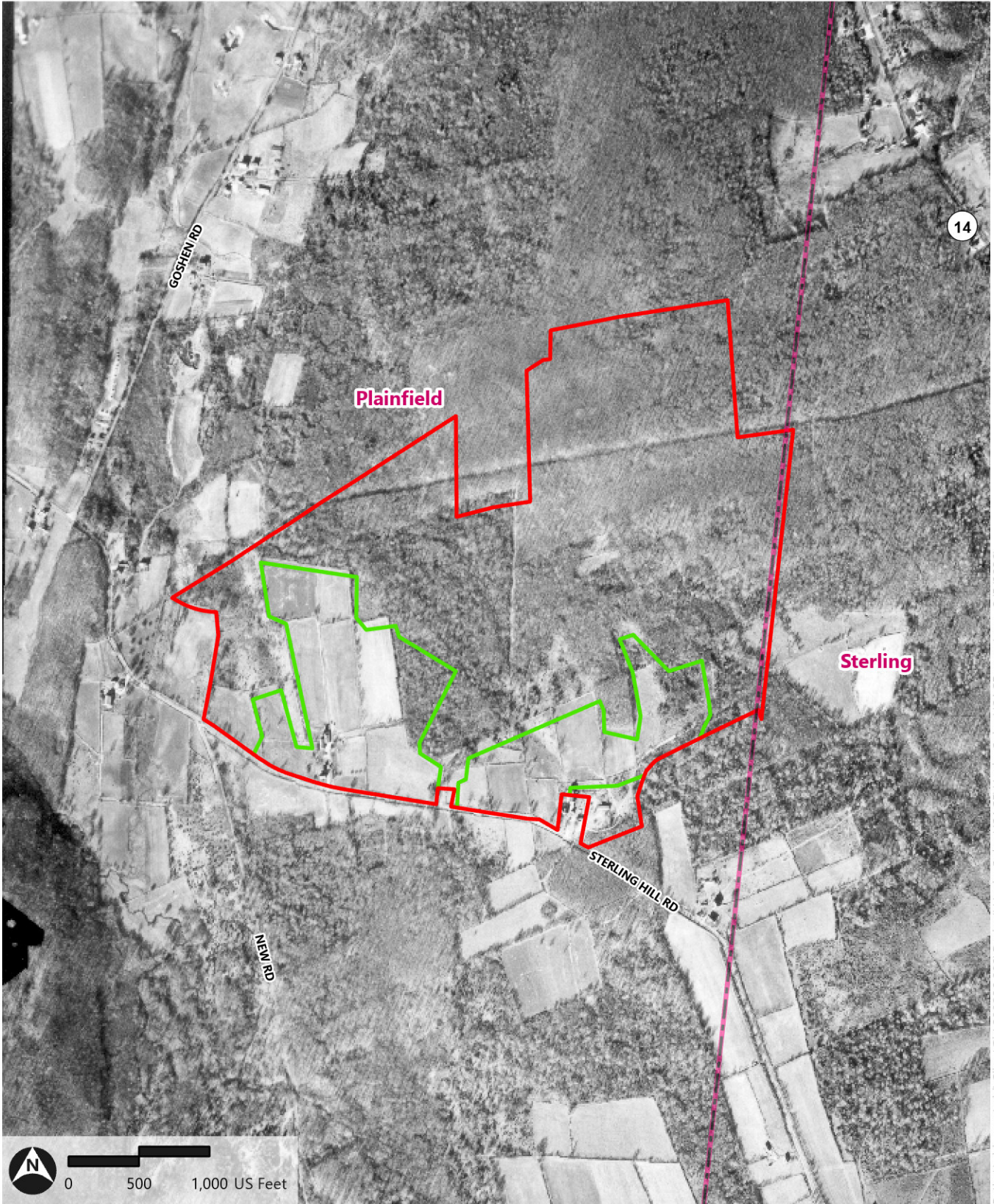
Path: \\vhb.com\gb\ClientGis\200236.000\Project\Husky\_Solar\_USACE\Husky\_Solar\_USACE.aprx (srao, 3/5/2026)

- Project Parcel
- Town Boundary
- Farm Field Boundary - 2025

Source: VHB, Nearmap, CTDOT

# Figure 1-2: Historic Aerial Map - 1951

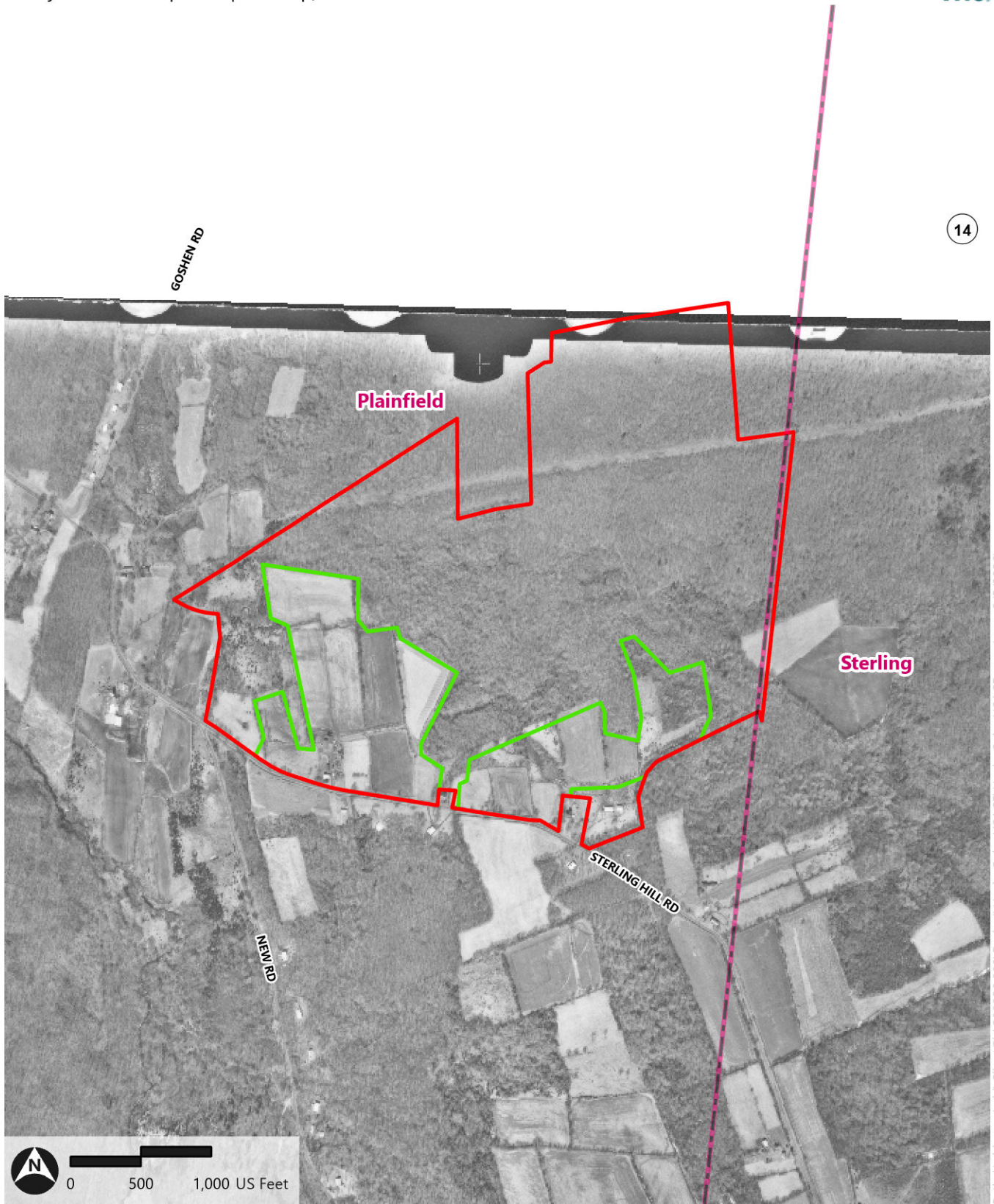
Husky Land Development | Moosup, Connecticut






Path: \\vhb.com\gb\ClientGis\200236.000\Project\Husky\_Solar\_USACE\Husky\_Solar\_USACE.aprx (srao, 3/5/2026)

- Project Parcel
- Town Boundary
- Farm Field Boundary - 2025

**Figure 1-3: Historic Aerial Map - 1970**  
Husky Land Development | Moosup, Connecticut

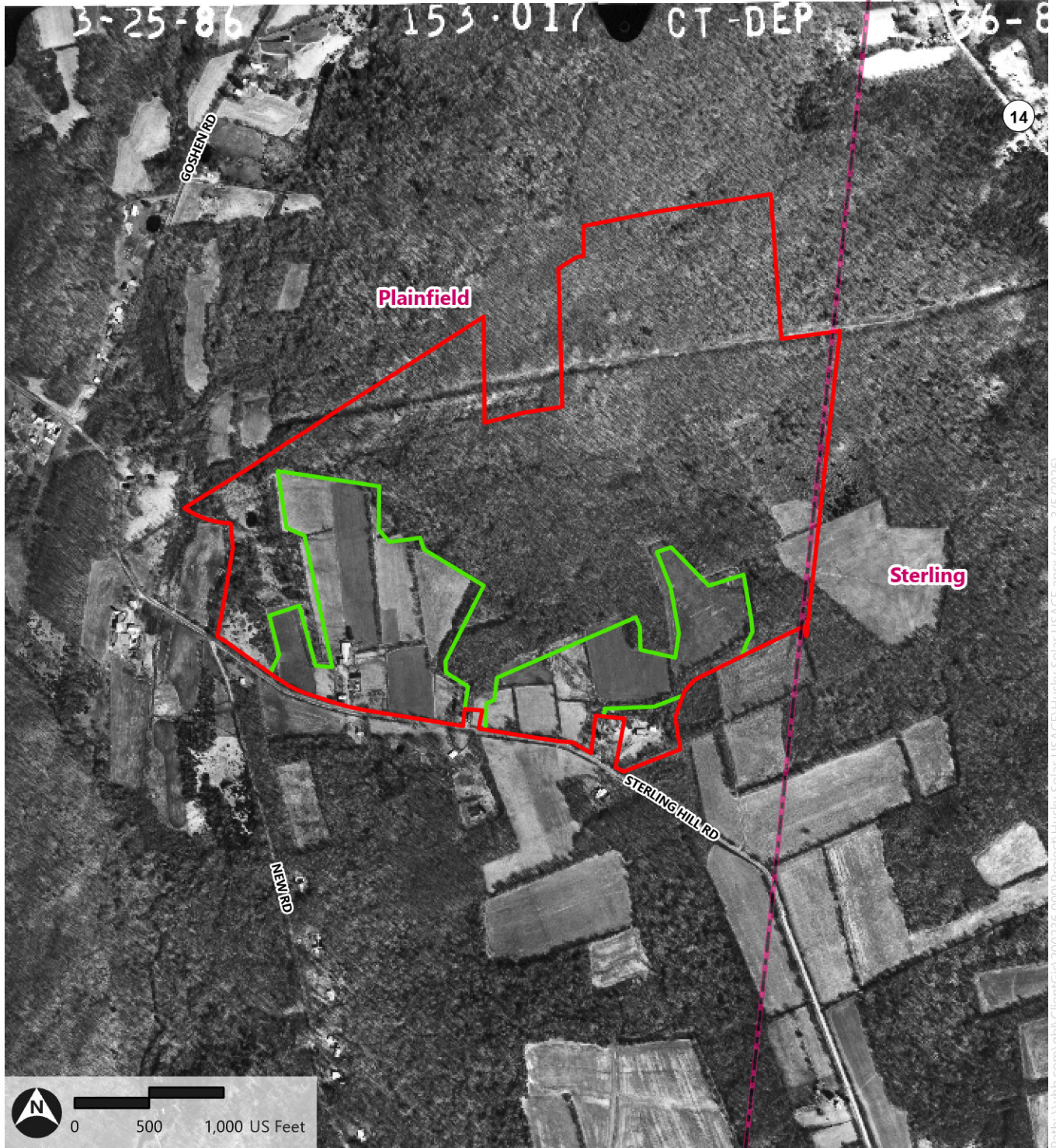


Path: \\vhb.com\gb\ClientGis\200236.000\Project\Husky Solar USACE\Husky Solar USACE\Husky Solar USACE.aprx (srao, 3/5/2026)

-  Project Parcel
-  Town Boundary
-  Farm Field Boundary - 2025

# Figure 1-4: Historic Aerial Map - 1986

Husky Land Development | Moosup, Connecticut



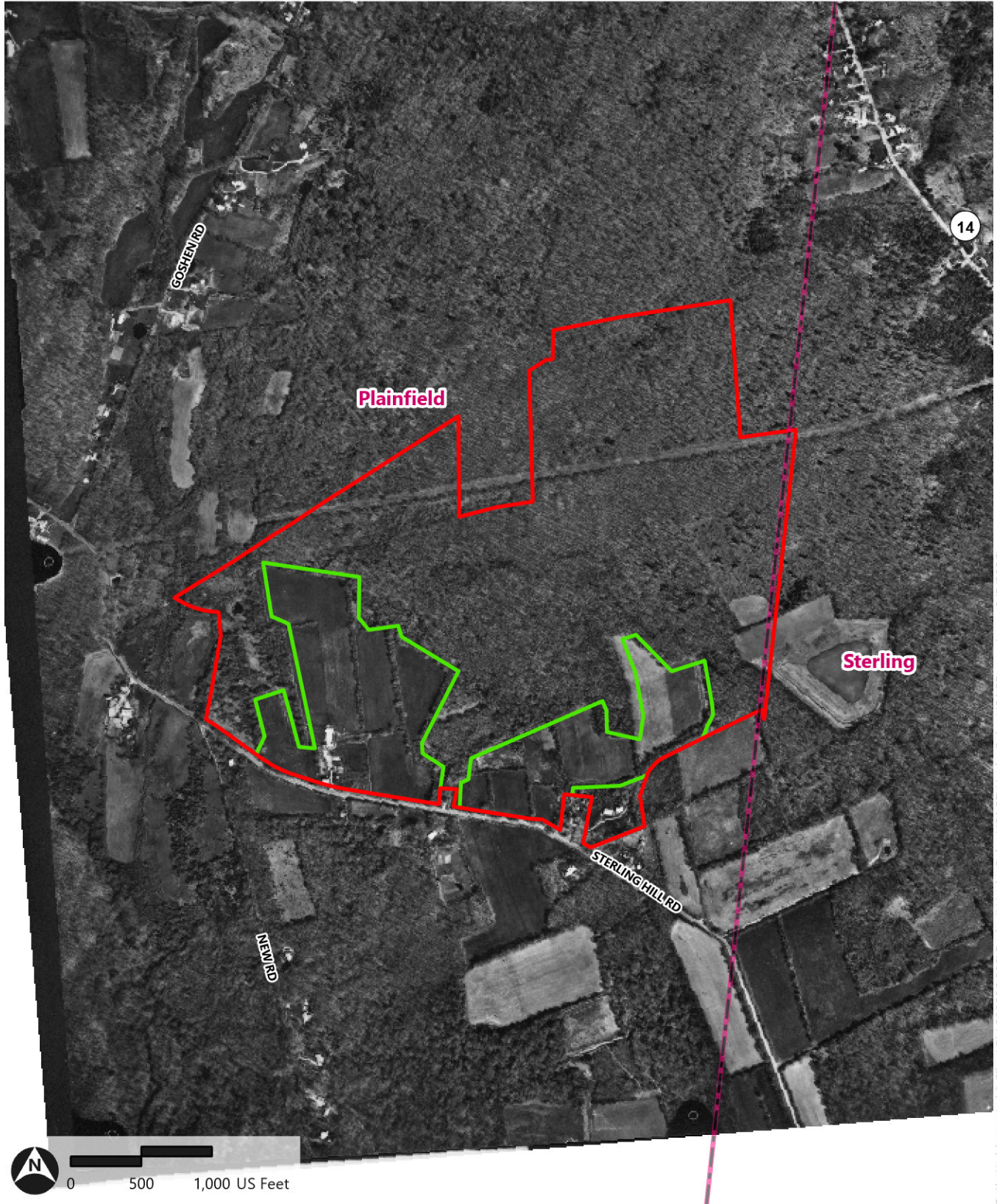
Path: \\vhb.com\gb\client\gis\2022\36.000\Project\Husky\_Solar\_USACE\Husky\_Solar\_USACE.aprx (srao - 3/5/2026)

- Project Parcel
- Town Boundary
- Farm Field Boundary - 2025

Source: VHB, Nearmap, CTDOT

**Figure 1-5: Historic Aerial Map - 1990**

Husky Land Development | Moosup, Connecticut



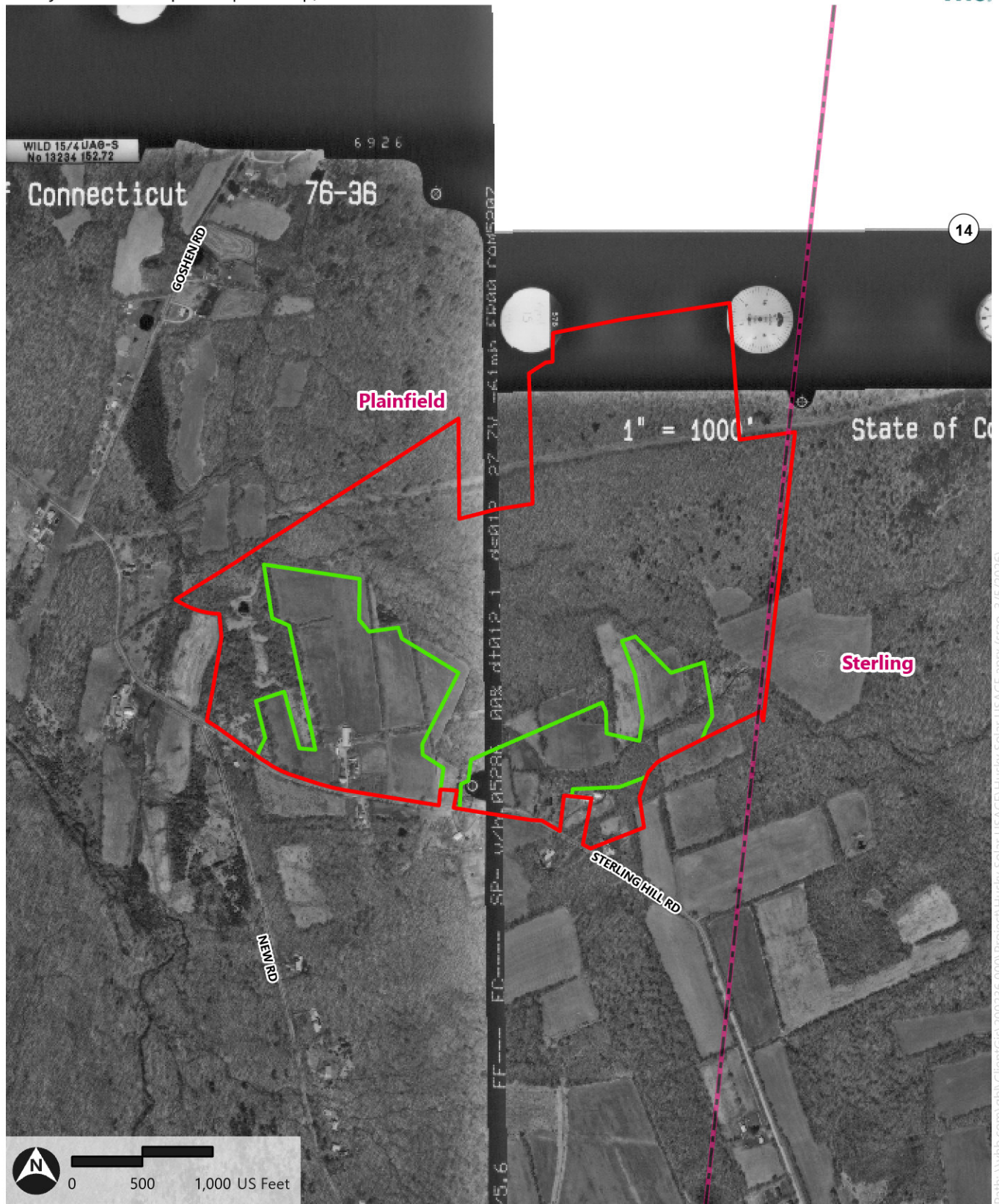
Path: \\vhb.com\gb\ClientGis\2022\36.000\Project\Husky\_Solar\_USACE\Husky\_Solar\_USACE.aprx (srao - 3/5/2026)

- Project Parcel
- Town Boundary
- Farm Field Boundary - 2025

Source: VHB, Nearmap, CTDOT

# Figure 1-6: Historic Aerial Map - 1996

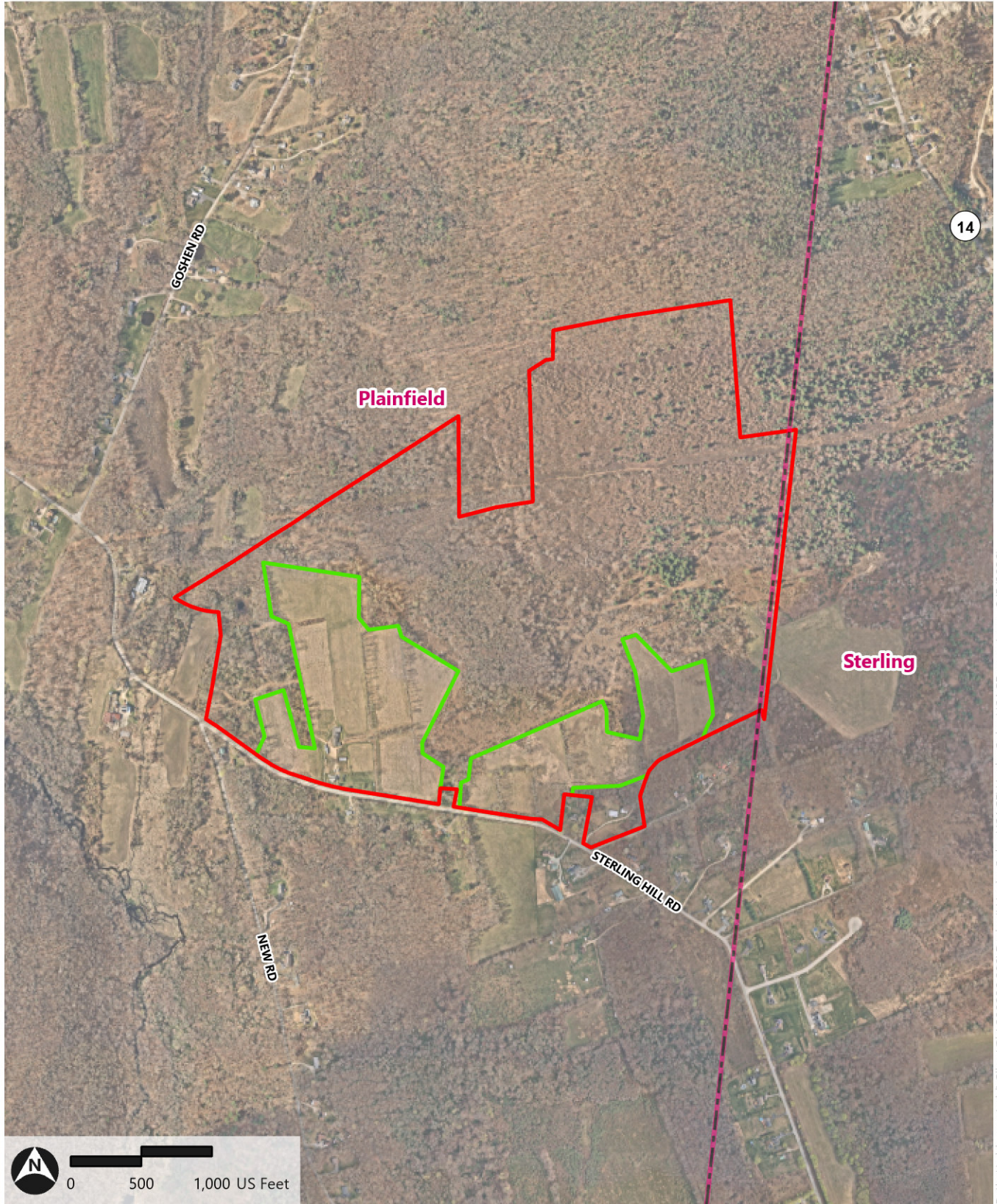
Husky Land Development | Moosup, Connecticut



- Project Parcel
- Town Boundary
- Farm Field Boundary - 2025

# Figure 1-7: Historic Aerial Map - 2025

Husky Land Development | Moosup, Connecticut



Path: \\vhb.com\gbp\ClientGis\202236.000\Project\Husky Solar USACE\Husky Solar USACE.aprx (srao, 3/5/2026)

- Project Parcel
- Town Boundary
- Farm Field Boundary - 2025

Source: VHB, Nearmap, CTDOT