

EXHIBIT F

Environmental Assessment



Environmental Assessment

Proposed Solar Photovoltaic Array 0 Chamberlain Highway Berlin, Connecticut

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1.0 INTRODUCTION

Solli Engineering (Solli) has prepared this Environmental Assessment (EA) on behalf of Tritec Americas, LLC, (Petitioner) as an exhibit to the Connecticut Siting Council for a Petition for a Declaratory Ruling that a Certificate of Environmental Compatibility and Public Need is not required for the construction, maintenance, and operation of a 0.99 megawatt (MW) alternating current (AC) ground-mounted solar photovoltaic array (Project/Facility) to be located at 0 Chamberlain Highway in Berlin, Connecticut (Site).

2.0 PROJECT DESCRIPTION

2.1 EXISTING SITE CONDITIONS

The Project area is comprised of a 5.6± acre portion of the 26.82± acre Site. The Site is bound by residential uses to the north and south, undeveloped woods to the east, and Chamberlain Highway to the west. The Site is located within the Planned Office/Development (POD) zoning district in the Town of Berlin. The parcel is currently unoccupied and is currently utilized as an agricultural field. The centrally located agricultural field is bound by wooded areas and Chamberlain Highway located along its perimeter. Based on information gathered from the Town of Berlin GIS, it is assumed that the neighboring residential properties are serviced by private water wells.

Elevations onsite range from approximately 309 feet at the northwest property corner along Chamberlain Highway to approximately 318 feet at the southeast corner of the property. Slopes range from 1% in the southwest property corner along Chamberlain Highway to approximately 18% at the northern portion of the property. The maximum slope within the area of the panels themselves is approximately 8%.

The site contains inland wetland soils in the northern and central portions of the property as well as shallow emergent marsh in the southwestern portion of the property. The Facility is proposed to be located outside of these existing wetland areas. Please refer to Section 3.2 for more details regarding existing water resources.

2.2 PROPOSED DEVELOPMENT

As designed, the proposed solar photovoltaic array will consist of approximately 2,590 TrinaSolar TSM-DEG19C20 540W modules, eight (8) Sungrow SG125HV 125kW inverters, AC panel boards and/or switchgear, one (1) 2,000 kVA transformers, and one (1) service interconnection line. The panels will be secured to a ground-mounted steel racking structure utilizing a single-axis tracking system, which allows the panels to rotate from east to west for more efficient capture of sunlight. The steel racking structure will be anchored to the ground using pile driven posts. The array of panels and the equipment will be surrounded by a 7-ft tall chain link security fence. Access to the Project will be from Chamberlain Highway via a 12-ft wide, 400± ft long gravel road. The road will extend to the north to provide access to the proposed equipment, and will generate minimal traffic, for the primary use of operation and maintenance of the photovoltaic array. The proposed utility interconnection service poles by Eversource will be located in the southwest corner of the Site.

2.2.1 PUBLIC HEALTH AND SAFETY

The Project has been designed to meet all applicable local, state, national, and industrial health and safety standards related to electric power generation. The Facility will not consume any raw materials, will not produce any by-products, and will be unstaffed under normal operating conditions. No chemicals will be used during the operation of the facility.

A 7-ft tall chain link fence surrounding the development is required per the Best Management Practices for Electric and Magnetic Fields and National Electric Code. This fence would mitigate potential electric hazards. The proposed project equipment has internal fail-safes to further mitigate the risk of electrical fires. A 26-ft wide gate is proposed at the entrance to the Project and will limit access to authorized personnel only. Town emergency response personnel will have access to the Project via a Knox padlock. The photovoltaic array will have the ability to be de-energized remotely in case of an emergency.

2.2.2 LAND USE PLAN

The solar photovoltaic array has been designed in accordance with state and federal policies and will support the State of Connecticut’s energy goals by constructing a renewable energy resource with no substantial adverse environmental impact. The solar photovoltaic array will comply with the current Connecticut State Building Code and National Electric Code.

The Facility has been designed to have a minimum setback of 50 feet from all abutting residential properties. Tree lines will be maintained to the best extent practicable, and additional evergreen trees will be planted to provide a visual buffer to adjoining properties.

The distance, direction, and address of the nearest property line and nearest off-site residence from the proposed 7’ chain link fence, transformer pad, and access drive is shown in Table 1.

Table 1: Proposed Development Limits Table

	Distance (ft)	Direction	Address/Town
Perimeter Fence to Property Line	4’	East	76 Chamberlain Highway
Perimeter Fence to Residence	103’	South	2537 Chamberlain Highway
Transformer Pad to Property Line	301’	West	Chamberlain Highway
Transformer Pad to Residence	481’	West	138 Butler Street
Access Drive to Property Line	62’	West	Chamberlain Highway
Access Drive to Residence	236’	West	2446 Chamberlain Highway
Project Area to Nearest Town Line	840’	East	Meriden

Equipment

TrinaSolar TSM-DEG19C20 540W modules are solar panels consisting of a glass-cover, aluminum pane, and sealed back sheet, preventing rainwater from penetrating the panels and leaching out chemicals or substances. These solar panels have a width of 7.8 feet, a minimum height of 4 feet above grade, and a maximum height of 7.5 feet above grade when panels are at full tilt. The manufacturer of the solar panels, Trina Solar Co., Ltd., has conducted Toxicity Characteristic Leaching Procedure (TCLP) testing of the proposed solar panels. The solar panels are not classified as hazardous waste. For more information refer to the TCLP test results attached in Appendix F, Product Data Sheets.

Medium voltage switchgear and the 2,000 kVa transformer is proposed to be installed on the concrete pad that abuts the proposed access driveway. The proposed transformer will contain mineral oil which is not a danger to the environment. The transformer is standard and used industry-wide, including by electrical

distribution companies such as Eversource. Final dimensions of the switchgear and transformer will be available when equipment is ordered.

Three (3) utility poles are proposed to be located directly adjacent to the concrete pad to provide interconnection to an existing utility pole on Chamberlain Highway. The standard height for utility poles is between 35 and 40 feet. The poles will be mounted with Eversource owned and operated equipment. All necessary offsite improvements to facilitate the interconnection will be completed by Eversource. Eversource Energy does not pad-mount their equipment; therefore, pole-mounted equipment is necessary to complete the project.

The Petitioner believes that this project will benefit the local community by improving electrical service for existing and future development with the availability of a local, renewable energy source.

2.2.3 STORMWATER MANAGEMENT PLAN

The Project has been designed in accordance with the *2024 Connecticut Stormwater Quality Manual*; the *Connecticut General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities* (General Permit), effective December 31, 2020; and the *Connecticut Department of Energy & Environmental Protection (CT DEEP) Appendix I, Stormwater Management at Solar Array Construction Projects* (Appendix I). The design addresses three primary concerns: the management of peak stormwater flows, water quality volume treatment, and soil and sedimentation controls (SESC) throughout the construction period.

To safeguard water resources from potential impacts during construction, the Petitioner is committed to implementing protective measures in the form of a Stormwater Pollution Control Plan (SWPCP), subject to review and approval by the CT DEEP Stormwater Management team. The SWPCP will include monitoring of established SESC measures that are to be installed and maintained in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control* and Appendix I. Please refer to Section 3.3.3 for more information regarding stormwater management.

The phased soil and erosion control plans and details are provided in Appendix B. To meet the requirements of the General Permit, silt fencing with compost filter socks will be installed during construction activities. Perimeter SESC measures will encircle the Project area to trap sediment mobilized during construction activities. These measures will clean deposited sediment as needed during construction to maintain sufficient sediment storage capacity.

As indicated in the Stormwater Management Report, pre-development drainage patterns are proposed to be maintained, to the greatest extent possible, to maintain and/or reduce peak post-development flows to off-site areas. The proposed design results in the management/reduction of post-development peak runoff rates from existing conditions for the 2-year, 25-year, 50-year, and 100-year storm events. Water quality treatment will be handled within existing stormwater catchment area in the southeast corner of the Site as well as via the seed mix proposed across the Project, which will promote a meadow-type ground cover that encourages infiltration.

With the incorporation of the protective measures outlined above, the Project is not anticipated to result in an adverse impact to water quality associated with nearby surface water bodies or downstream properties.

2.24 LANDSCAPE PLAN

Vegetation buffers are proposed to shield the Facility from neighboring properties. The existing tree line along the western and southwestern border of the Property will be modified for the installation of the array.

This modification will still result in a vegetative buffer being provided for the road and neighboring properties. An existing forest provides a buffer on the east, north, and southeast portions of the Site.

Seed mixes for the proposed solar photovoltaic array include ERNMX-147 for final stabilization within the solar array, ERNMX-610 for areas outside of the fence line and in non-array areas, and New England Erosion Control/Restoration No Mow Mix for the stormwater basin. For more information refer to the seed mix notes in Sheet 2.11 of Appendix B.

3.0 ENVIRONMENTAL CONDITIONS

This section provides a summary of the Site's existing environmental conditions as well as the potential impacts on the environment from the proposed development. The results discussed in this section demonstrate that the development complies with CT DEEP air and water quality standards and will have no adverse effect on the existing environment and ecology.

3.1 AIR QUALITY

The nature of solar energy generating facilities results in a condition where no air emissions are generated during the operations of the facility. Therefore, this development will have no adverse effect on air quality and will not require a permit.

During construction, temporary mobile source emissions may occur due to the presence of construction vehicles and equipment. Any of these potential air emissions that occur during the construction of the solar photovoltaic array can be considered de minimis. These emissions will be mitigated using measures such as limited idling times of equipment, regular maintenance of all vehicles and equipment, and watering/spraying of vehicles and equipment to minimize dust and particulate releases. Additionally, all on-site and off-road equipment will meet the latest standards for diesel emissions as prescribed by the United States Environmental Protection Agency.

3.2 WATER RESOURCES

Wetlands and watercourses onsite were identified, field delineated, and assessed by William Kenny Associates LLC on July 10 and 11, 2023. One wetland and watercourse system is present within the central and northern portions of the property. The system is primarily a woodland wetland and several associated intermittent watercourses. Areas of meadow wetlands are also present.

3.2.1 WETLANDS AND WATERCOURSES

Red-Maple Hardwood Swamp

This woodland wetland and watercourse system is a red maple hardwood swamp habitat. The principal source of hydrology for this wetland and watercourse system is groundwater discharge and surface water flow from the northern portion of the Site, the northwestern and northeastern corners of the Site and the central-eastern and central-western portions of the Site. A drainage divide between the Mattabeset River and Sodom Brook River Subregional Drainage Basins (Section 3.4.2) bisects the property from east to west. Surface water and shallow subsurface groundwater that pitches north of this divide feeds onsite wetlands within the Mattabeset River Subregional and Regional Drainage Basins, while surface water and subsurface water that pitches south of this divide, toward the area of the proposed project, drains toward the Sodom Brook River Subregional Drainage Basin. The canopy within the red maple hardwood swamp consists primarily of pole-timber-sized trees, which are approximately 40 to 50 years old. Larger saw-timber-sized American sycamore trees are interspersed throughout the system as well as pole-timber-sized green ash, pin oak, and American elm trees. Understory trees include grey birch, black cherry, eastern red

cedar, and boxelder maple trees. Areas of upland woodland habitat onsite adjacent to the red maple hardwood swamp are comprised of generally the same tree species. The wetland has a relatively dense shrub strata consisting of native grey dogwood and silky dogwood as well as raspberry and pussy willow shrubs and invasive multiflora rose, amur honeysuckle, autumn olive, and wineberry shrubs. Interspersed in the shrub strata are green ash and sassafras saplings. Woody vines are also common in the wetland within areas of open canopy and along the edge and include native grape vines and invasive oriental bittersweet vines. Groundcovers within the wetland include skunk cabbage, goldenrod, Virginia creeper, jewelweed, water hemlock, false nettle, sensitive fern, royal fern, wood fern, common bracken fern, reed canary grass, tussock and other sedges, and invasive common reed and garlic mustard. Soils within the system consist of poorly drained, loamy soils formed in lodgment till. The deposits are from red arkosic sandstones native to the Connecticut Rift Valley. The hydrogeomorphic classification of this portion of the wetland and watercourse system is “Gently Sloping” and the USFWS National Wetlands Inventory (NWI) classification for this system is Palustrine, Forested, Broad-Leaved Deciduous (PFO1). The USFWS NWI map is attached in Appendix A as Figure 2.

Shallow Emergent Marsh and/or Wet Meadow Habitat

Within the southwestern portion of the wetland system adjacent to Chamberlain Highway where a subsurface culvert enters the Site, a portion of shallow emergent marsh habitat is present. This shallow emergent marsh drains to one of the intermittent watercourses that feed into the main wetland and watercourse system (i.e., the red maple hardwood swamp). This marsh is dominated by invasive reed canary grass and common reed. The area where this marsh is present is within a depression. In addition to the shallow emergent marsh habitat, other meadow wetlands are wet meadow habitat and are maintained as cropland/field crops. Vegetation within this wet meadow habitat consists of the same vegetation as can be found within the upland cropland/field crops habitat, with the exception of facultative and obligate wetland groundcover species such as sensitive fern and soft rush. Soils within the system consist of poorly drained, loamy soils formed in lodgment till. The deposits are from red arkosic sandstones native to the Connecticut Rift Valley. The hydrogeomorphic classification of these portions of the wetland and watercourse system are “Depressional” or “Gently Sloping” and the USFWS NWI classification for this system is Palustrine, Emergent, Nonpersistent/*Phragmites australis* (PEM2/5). The USFWS NWI map is attached in Appendix A as Figure 2.

3.2.2 WETLAND IMPACTS

Land development has the potential to cause direct and indirect impacts to inland wetlands and watercourses in the short-term and long-term from activities such as vegetation clearing, soil filling, soil excavation, and/or pollution of stormwater. The proposed site improvements are designed to avoid direct and indirect impacts in the short-term and long-term. No direct impacts to wetlands or watercourses are proposed with the project. The location of the project site is more than 100 feet from inland wetlands and watercourses, and no site work is proposed within the 50-foot local (Town of Berlin) upland review area of onsite wetlands. In the short-term, soil erosion and sedimentation control measures are proposed with the Project to prevent adverse indirect impacts to the wetlands and in the long-term, no adverse impacts from stormwater runoff will impact the wetlands due to the Project’s minimal impervious surfaces and proposed stormwater management plan. A detailed review of proposed best management practices (BMPs) such as soil erosion and sediment control measures and stormwater management measures are discussed in Section 3.3.3.

Table 2: Wetlands Impacts Table

Wetlands Impacts	
Direct Impacts to Wetland	0.00 Acres
Direct Impacts to Upland Review Area of Wetland	0.06 Acres

3.2.3 FLOODPLAIN AREAS

The most recent available mapping from the Federal Emergency Management Agency (FEMA) was reviewed regarding the presence of floodplain or flood prone areas onsite. According to the FEMA Flood Map Service Center (MSC), flood map number *09003C0068F*, effective on September 26, 2008, the Site and Project fall within “Zone X” as defined by FEMA. Zone X is defined as “are the areas between the limits of the base flood and the 0.2-percent-annual-chance (or 500-year) flood.” This indicates that the project site is not within a flood zone and requires no special considerations relative to flooding for its implementation. For more information regarding the FEMA Floodplain Boundaries refer to Appendix A Figure 3, FEMA Flood Map.

3.3 WATER QUALITY

The proposed solar array facility will have no potable water uses or sanitary discharges due to the unmanned nature of the facility. The proposed development will result in a de minimis increase in impervious cover within the Project. Regardless, the development includes a stormwater management plan to control stormwater.

3.3.1 GROUNDWATER

The CT DEEP *Water Quality Classifications Berlin, CT* map, dated October 2018, was reviewed in order to assess the quality of ground and surface water at the property. This map is attached in Appendix A as Figure 4. The map classifies that the property falls within an area classified with ‘GA’ groundwater quality. ‘GA’ is defined as “existing private and potential public or private supplies of water suitable for drinking without treatment and baseflow for hydraulically-connected surface water bodies.”

According to the CT DEEP Public Water Supply Map, the property does not fall within an aquifer protection area. The nearest aquifer protection area is approximately 0.85 miles to the southeast. The property currently has no connections to public water or sewer mains and the proposed facility will be unstaffed and have no need for potable water. This map is attached in Appendix A as Figure 5.

Based on the project design, type, and use and proposed stormwater management measures, it is concluded that the project will have no adverse environmental impact on groundwater quality. Information regarding stormwater management BMPs is provided in Section 3.3.3.

3.3.2 SURFACE WATER

The Site is situated within Local Drainage Basins (4600-01), which occupies the northern portion of the Site, and (5205-02), which occupies the southern portion of the Site. These drainage basins are part of the larger Subregional Drainage Basins for the Mattabesset River (4600) and Sodom Brook River (5205), which are in turn part of the larger Regional Drainage Basins for the Mattabesset River (46) and Quinnipiac River (52) respectively. The Mattabesset River is a part of the Connecticut River Major Drainage Basin (4), and the Quinnipiac River is a part of the South Central Coast Major Drainage Basin (5). According to available resources, no watercourses are present onsite; however, several intermittent watercourses are present within the northern portion of the Site and are approximately greater than 200 feet from the project site. These intermittent watercourses flow toward the northern portion of the Site where surface water drains to the red maple hardwood swamp. Surface water conveyed from these intermittent watercourses and the swamp feed into an offsite potentially manmade pond approximately 360 feet northeast of the Site. This pond in turn drains northeast before apparently diverting northwestward along an apparent drainage ditch and passing beneath Chamberlain Highway to enter wetlands associated with Stocking Brook. As the onsite intermittent watercourses do not appear on available public maps, no streamflow or surface water quality classification are set for them. The water quality classification of the offsite pond is listed as ‘Class A’ surface water quality according to the CT DEEP *Water Quality Classifications Berlin, CT* map, attached in Appendix A

as Figure 4. ‘Class A’ surface water quality is defined as “habitat for fish and other aquatic life and wildlife; potential drinking water supplies; recreation; navigation; and water supply for industry and agriculture.”

According to the CT DEEP Public Supply Watershed Map (Appendix A, Figure 5), the property does not fall within a drinking water watershed. The nearest drinking water watershed is approximately 530 feet west from the northwestern corner of the property. It is unknown if the offsite, potentially man-made pond to the northeast of the property serves as habitat for small fish and other aquatic wildlife and flora and fauna. None of the onsite intermittent watercourses serve or have the capacity to serve fish species such as trout. According to the CT DEEP Connecticut Trout Stocking ArcGIS Map, the nearest trout stocked area is approximately 1.85 miles southwest of the property at Mirror Lake in Meriden, Connecticut. The on-site intermittent watercourses are not cold-water habitat. The nearest cold-water habitat is approximately 4,400 feet to the southeast of the property and is associated with Cathole Brook. As such, no impacts to cold water habitats from the project will occur. Based on the project design, type, and use and proposed stormwater management measures, it is concluded that the project will have no adverse environmental impact on surface water quality. Information regarding stormwater management BMPs is provided in Section 3.3.3.

3.3.3 STORMWATER MANAGEMENT

In the short-term, wetlands and watercourses can be indirectly impacted from sediment laden stormwater from proposed construction activities. The majority of proposed development activities, save for the installation of a portion of the proposed wildlife-friendly chain link fence that will surround the solar array, are located more than 100 feet from inland wetlands and watercourses, and no proposed site work is located within the Town of Berlin’s 50-foot upland review area for wetlands. The project proposes the installation of soil erosion and sedimentation controls and the maintenance of these controls throughout construction to prevent adverse indirect impacts to inland wetlands and watercourses from soil erosion and sedimentation. These controls are designed to comply with standards set by the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control* published by the CT DEEP (the predecessor to the CT DEEP) to manage the land disturbance from the development and protect surface water features. Such controls include but are not limited to temporary silt fencing surrounding the northern and eastern perimeter of the development area where the site currently pitches toward, and an anti-tracking pad at the construction entrance to Chamberlain Highway. These control measures will be installed at the start of construction during phase one and before the site is grubbed and roughly graded. Phase two of construction involves the fine grading of the project site. Silt fencing is proposed to prevent sediment from migrating downslope to inland wetlands and watercourses or from migrating offsite. The anti-tracking pad is proposed to prevent sediment from being tracked into Chamberlain Highway. These control measures have been provided to maximize protection to wetlands and watercourses and the monitoring and maintenance of all control measures are required to ensure efficacy throughout all phases of construction.

In the long-term, and if not properly mitigated, wetlands and watercourses can be indirectly adversely impacted by stormwater runoff that flows from buildings, pavement, and vegetated surfaces. The proposed Project will not cause post-construction long-term adverse impacts from stormwater runoff because the Project only includes a small amount of impervious surface and because of the proposed stormwater management plan, which will mitigate for changes to stormwater runoff resulting from the small amount of proposed increase in impervious cover. A stormwater catchment area exists in the southeastern corner of the Project. The existing stormwater catchment area provides adequate storage of the water quality volume generated from impervious surfaces. Stormwater flowing to the catchment area will follow proposed grades and the area will allow captured stormwater to settle and gradually infiltrate into the surrounding soils. The area will also allow for pollutants to be removed when the stormwater flows through vegetation, stems, leaves, and roots. The implementation and maintenance of this BMP will protect stormwater quality and will ensure that post-construction peak discharge rates of stormwater runoff from the project site will be less than predevelopment rates for the 2-, 25-, 50-, and 100-year storm events.

3.4 HABITAT & WILDLIFE

The Site is located at 0 Chamberlain Highway in Berlin Connecticut. Three (3) habitat types are present at the Site. The upland habitat type is cropland/field crops habitat, and the wetland habitat types include red maple-hardwood swamp habitat and shallow emergent marsh habitat and/or wet meadow habitat. These habitat types are further discussed in Sections 3.4.1 and 3.2.1. Wildlife species that can use the property are common species to the area. These species are further discussed in Section 3.4.3 and the acreage of proposed habitat alteration is provided in Table 2.

3.4.1 HABITAT TYPES

Cropland/Field Crops

A majority of the Site consists of an upland meadow with a variety of hay crop species. According to historic aerial imagery of the property, the entire site has been maintained as agricultural land as far back as 1934, and the areas of woodland onsite today appear to be present from the 1986 aerial photograph and onward. The Project area is relegated to the southern portion of the Site in primarily this habitat type. The hayfield includes a variety of grasses and forbs including brown knapweed, sweet vernal grass, tall oat grass, timothy grass, smooth broom, rosette grass, redtop, fox sedge, red and white clover, large hop clover, vetch, bedstraw, common milkweed, ironweed, daisy fleabane, black eyed susan, wild carrot, creeping thistle, common selfheal, and dock. Vegetation height during peak growing season is roughly three to four feet high. Soils throughout the hayfield that are not within mapped wetlands are primarily well drained to moderately well drained loams over sandy outwash material from glaciofluvial deposits or are excessively drained sandy loams and loamy sands also formed from glaciofluvial deposits. Soils are formed from red parent material native to the Connecticut Rift Valley. The southern portion of the cropland/field crops habitat is proposed to be eliminated by the proposed project. Please see Table 2 for the total acreage of habitat alteration.

Wetlands & Watercourses

One (1) inland wetland and watercourse system was identified, delineated, and assessed at the property on July 10 and 11, 2023 by William Kenny Associates LLC. Further detail regarding these wetlands and watercourses is provided in Section 3.2.1. The wetlands and watercourses are not proposed to be disturbed or impacted by the proposed development. Please see Table 2 for the total acreage of habitat alteration.

Table 3: Habitat Area Table

Habitat Type	Total Area Onsite (±Acres)	Area of Disturbance (±Acres)
Woodland	4.6	0.0
Cropland	14.5	5.6
Wetland	7.6	0.0

3.4.2 CORE FOREST DETERMINATION

The Connecticut Department of Energy and the Environment (CT DEEP) defines ‘core forests’ as “forests surrounded by other forests, and in Connecticut, it has been defined as forest features that are relatively far (more than 300 feet) from the forest-nonforest boundary. Core forests provide habitat for many species of wildlife that cannot tolerate significant disturbance. The loss of core forest cover diminishes water purification and habitat values and could result in heavier runoff, which might lead to poorer water quality and impaired habitat.”

According to the CT DEEP 2020 Connecticut Forest Plan Priority Areas Map (Appendix A, Figure 11), no Core Forest site is located at the Site. As such, no impacts to Core Forests are proposed. The closest Core Forest is approximately 260 feet to the east of the eastern corner of the Site, which according to the CT DEEP map is an approximately 24-acre Small Core Forest. The closest Large Core Forest according to the

CT DEEP map is approximately 4,600 feet to the southwest of the southwestern corner of the Site and is an approximately 800-acre forest.

3.4.3 WILDLIFE

The proposed Project will neither eliminate nor modify wetlands or watercourses at the property but will modify approximately one-third of the cropland/field crops habitat (5.6 acres). This includes converting the area of the hayfield within the Project to early successional meadow habitat.

The largest habitat currently at the Site is the cropland/field land habitat. This habitat accounts for roughly 54 percent of the vegetative coverage at the Site. Cropland/field crop habitat is common for this region of Connecticut and supports large amounts of generalist wildlife species. Wildlife groups expected to use the habitat include mammals, avian, and herpetofauna species.

Large mammals such as the white-tailed deer, red fox, and eastern coyote use cropland/field crops habitat as high-quality foraging habitat, hunting for small mammals, or browsing the herbaceous vegetation. While a significant portion of the cropland/field crops habitat will be eliminated in order to construct the proposed project, this habitat is proposed to be replaced with the creation of early successional meadow habitat. This habitat will generally serve the same purposes for large mammals as those of the existing habitat with minor exceptions. Large mammals will be excluded from the area of proposed development and the proposed early successional meadow habitat via proposed chain link fencing. However, with the use of wildlife-friendly fencing (i.e., fencing that has a six-inch gap at the bottom), it is likely that the proposed early successional meadow habitat will ultimately create a higher yield of small prey that can be accessed outside of the Project.

Small mammals expected to use cropland/field crops habitat include shrews, eastern cottontail, woodchuck, meadow vole, woodland vole, meadow jumping mouse, raccoon, and striped skunk. These animals use this habitat for burrowing, foraging, and traveling via a protected (covered) corridor. The conversion of the existing cropland/field crops habitat to early successional meadow habitat should have a minimal effect on small mammal populations. The proposed chain link fencing around the solar array will not prevent small mammals from entering the proposed early successional meadow habitat; rather, it will exclude large mammal predators. Additionally, the overhead protection from the physical solar panel units will aid in providing cover for these species from avian predators.

A wide variety of avian species utilize cropland/field crops habitat. Some species use the lack of canopy coverage within the cropland/field crops habitat to soar unimpeded while hunting for small mammals in the fields below, some find perching trees along the fringes of the field, some prowl and prod the underlying sandy soil in search of insects, and others use the herbaceous vegetation within the cropland to build nests. Avian species identified during field investigations include gray catbird, American goldfinch, song sparrow, chirping sparrow, blue jay, tufted titmouse, common yellowthroat, American robin, black capped chickadee, red winged blackbird, indigo bunting, house finch, house wren, chimney swift, warbling vireo, common grackle, American crow, and wild turkey. The conversion of the current cropland/field crops habitat to early successional meadow habitat should have a minimal effect on avian populations. Similar herbaceous vegetation will be available for nest building as that found within the cropland/field crops habitat upon the creation of the early successional meadow. There is potential to increase prey populations as discussed earlier, and the physical solar panels units will provide low covered space for shrub nesting birds to utilize the proposed early successional meadow habitat.

Lastly, herpetofauna expected to use this habitat primarily consists of snake species, which include northern black racer, red belly snake, milk snake, and rat snake. Herpetofauna use cropland/field crops habitat for their large quantities of sunlight and sandy soils for burrowing/egg laying. Additionally, snakes utilize tall

herbaceous cover within this habitat to hunt for small prey. The conversion of the current cropland/field crops habitat to early successional meadow habitat should have a minimal effect on herpetofauna populations. The proposed wildlife-friendly chain link fencing around the solar array will not prevent herpetofauna from entering the proposed early successional meadow habitat; rather, it will exclude large mammal predators. Likewise, the overhead protection from the physical solar panel units will aid in providing cover for these species from avian predators.

The second largest habitat currently at the property is the combination of the red maple hardwood swamp and the associated upland red maple-dominated woodland habitat. This habitat accounts for roughly 38 percent of vegetative coverage at the property. Red maple hardwood swamps and the associated upland woodlands are common in Connecticut and support large amounts of generalist wildlife species. Wildlife use this habitat's relatively closed overstory and dense shrub layer for foraging, nesting, and coverage. Wildlife expected to use this habitat include mammals, avian, and herpetofauna species.

Large mammals such as white-tailed deer, red fox, and eastern coyote use red maple hardwood swamp habitat for high-quality foraging and drinking water. Predators use this habitat for hunting small mammals or accessing the nearby cropland/field crops habitat. Small mammals expected to inhabit the red maple hardwood swamp habitat include eastern cottontail, raccoon, long tailed weasel, mink, and various shrews/mice. These animals use this habitat for burrowing, foraging, and traveling via downed coarse woody debris.

A wide variety of avian species use red maple hardwood swamp habitat. Some species use the canopy to perch while hunting for small mammals on the woodland floor while some species use the dense shrubby layer for protected nesting. Avian species identified during field investigations are mentioned in the discussion on wildlife that utilizes the cropland/field crops habitat. Additional species that are expected in red maple hardwood swamp habitat includes worm eating warbler, northern cardinal, tree swallow, and swamp sparrow.

Lastly, herpetofauna expected to use red maple hardwood swamp habitat includes northern dusky salamander, four-toed salamander, eastern newt, eastern American toad, northern spring peeper, wood frog, and northern black racer. Herpetofauna use red maple hardwood swamp habitat for its ample amounts of water, rock outcrops for sunning and mucky soils for burrowing. Additionally, snakes use red maple hardwood swamp habitat to hunt small mammals with the aid of herbaceous cover.

As no alteration of the red maple hardwood swamp habitat or the associated upland red maple dominated woodland habitat is proposed, the utilization of this habitat by mammals, avian species or herpetofauna should not be altered by the Project.

The smallest habitat currently on the property is the combined shallow emergent marsh and wet meadow habitat. This habitat accounts for roughly 8 percent of vegetative coverage at the property. Wet meadows such as those onsite, are common in Connecticut and support large amounts of generalist wildlife species. Wildlife use this habitat for its dense herbaceous cover, wet characteristics, and lack of overstory. Wildlife expected to use this habitat include mammals, avian, and herpetofauna species.

Large mammals such as white-tailed deer, red fox, and eastern coyote use shallow emergent marsh and wet meadow habitat for high-quality foraging and drinking water. Predators use the habitat for hunting small mammals or accessing the nearby cropland/field crops habitat. Small mammals expected to use shallow emergent marsh and wet meadow habitat includes eastern cottontail, raccoon, long tailed weasel, mink, and various shrews/mice. These animals use shallow emergent marsh and wet meadow habitat primarily for coverage from predators.

A wide variety of avian species shallow emergent marsh and wet meadow habitat. Some species use the open canopy space to hunt for small mammals in the marsh below, some perch along the fringe in tall canopy trees, some prowl and prod the mucky sandy soil in search of insects and other invertebrates, others build nests in the thick herbaceous vegetation. Avian species identified during field investigations are mentioned in the discussion on wildlife that utilizes the cropland/field crops habitat. Additional species that are expected in this habitat include worm eating warbler, northern cardinal, tree swallow, and swamp sparrow.

Lastly, herpetofauna expected to use shallow emergent marsh and wet meadow habitat includes four-toed salamander, eastern newt, eastern American toad, northern spring peeper, wood frog, and the northern black racer. Herpetofauna use shallow emergent marsh and wet meadow habitat for its ample amounts of water, open canopy for sunning and mucky soils for burrowing. Additionally, snakes use shallow emergent marsh and wet meadow habitat to hunt small mammals with the aid of tall herbaceous cover.

As no alteration of the shallow emergent marsh and wet meadow habitat is proposed, the utilization of this habitat by mammals, avian species or herpetofauna should not be altered by the proposed project.

Due to the Project, the diversity and abundance of wildlife using the property including the Facility is expected to increase in some areas and decrease in others. Although modification of existing cropland/field crops habitat is proposed, the proposed conversion of portions of this habitat within the Project to early successional meadow habitat should result in an increase of some groups of species such as avian, herpetofauna and small mammal. Other groups of species, specifically large mammals, will slightly decrease in abundance due to their exclusion from the early successional meadow habitat by proposed wildlife-friendly chain-link fencing; however, it is important to note that the species inhabiting the Site and Project are common in the town of Berlin and the State of Connecticut. Generalist species are tolerant of site disturbance and will find other suitable habitats if they cannot adapt to the change. As such, the Project will not have significant adverse impacts to wildlife.

3.5 RARE SPECIES

Publicly available state and federal information was reviewed to determine whether listed species and/or critical habitats were present on or adjacent to the Site or could potentially be present onsite. State records indicate that listed species are present on or nearby the Site that may be affected by proposed project activities. Federal records indicate that the Site may potentially serve as habitat for listed species and/or as a stop for protected migratory birds. A limited onsite review of the Site was completed on July 10 and July 11, 2023. Based on the results of the review of state and federal records and field investigations, and to increase the habitat value for wildlife and listed species utilizing the area, various construction and site management protection measures are proposed to be implemented prior to and during construction of the project and that long-term habitat enhancement and management activities are proposed to be implemented post construction.

3.5.1 NATURAL DIVERSITY DATA BASE

The CT DEEP Natural Diversity Data Base (NDDB) maintains a collection of maps that show the approximate locations of state endangered, threatened, and special concern species and important natural communities in Connecticut. The locations shown on the maps are based on information collected over the years by DEEP personnel and others. The maps are intended to serve as a pre-screening tool for preventing potential impacts to listed species. Maps are generated for each town. The map for the Town of Berlin is dated June 2023. To protect individuals of listed flora and fauna, their exact locations are not shown on the maps; rather, the maps show broad zones that extend over and beyond known locations of listed individuals. These zones are shown with gray line hatching and areas of critical habitat are shown with green polygons. If a project site falls within or near a hatched area, a request for determination should be filed with the CT

DEEP NDDDB for more accurate information and field work should occur to determine the presence or absence of these species onsite.

According to the Town of Berlin NDDDB map (Appendix A, Figure 7), this Site does not fall within a hatched area and is approximately one quarter mile from the nearest area that is east of the site. Regardless, a NDDDB review request was submitted to the CT DEEP and the results of this review indicate that two state-listed species have the potential to be impacted by the Project. The two state listed species are the eastern box turtle (*Terrapene carolina carolina*), and the Jefferson salamander “complex” (*Ambystoma jeffersonianum*).

Eastern box turtles are listed as state ‘species of special concern’ by the CT DEEP. Eastern box turtles typically inhabit well-drained forest bottomlands and open deciduous forests and will utilize a variety of other early successional habitats such as field edges (and other edge habitat such as utility corridors) and thickets. They also will utilize wetland habitats such as marshes, bogs, and streams at various times during their active season. Eastern box turtles are active between April 1 and November 1; in the remaining months, they are dormant in a state of brumation a few inches under the ground surface.

Jefferson salamanders “complex” are listed as state ‘species of special concern’ by the CT DEEP. Jefferson salamanders prefer steep, rocky areas in or near undisturbed second growth forest with rotten logs and a heavy duff layer. They spend most of the year underground but congregate during breeding cycles. Their breeding pools may be in hemlock groves, deciduous forests, or grassy pasture ponds. They actively breed from February to April.

To protect eastern box turtles and Jefferson salamanders that may potentially be encountered at the project site, the CT DEEP requires the following measures which are summarized below to be followed during pre-construction, mid-construction, and post-construction. All ground disturbance work associated with the project must be conducted between April 1 and November 1, the eastern box turtles’ active season. It is recommended mowing not occur during May 15 to September 15. If mowing is to occur during this time frame, whether pre-construction or post-construction, the CT DEEP recommends the following.

Pre-Construction:

- In preparing the site for development, exclusionary fencing that is at least twenty (20) inches tall and that is secured and keyed into the ground must be installed around the perimeter of the work area to prevent turtle and salamander access to the site. The work area includes all areas used for site access, equipment parking, material staging, material storage, and construction purposes. The entrance to the site also must be cordoned off with an exclusionary method when the site is not in use. This can be accomplished with a row of hay bales that can be moved when access to the site is needed.
- If mowing needs to occur before exclusionary fence installation within the active turtle timeframe, the mowing style, mowing height, mowing directionality, mowing speed, and the location of non-mowing areas should be as follows:
 - Mowing style: Avoid flail mower heads with guide bars that ride along the ground. Sickle bar mowers will have the least impact if mowing every one to five years. In areas with more woody vegetation, a less than one-to-two-inch diameter Brontosaurus-style mower will have the least impact on turtles.
 - Mowing height: The retention of mowing stubble seven to twelve inches in height will reduce mortality, reduce blade wear, and will leave important cover for animals.
 - Mowing directionality: Start mowing from the center of the field and use a back-and-forth approach, or large circular pattern to avoid concentrating fleeing animals where they may be killed or stranded. In addition, leave an unmowed 30-foot strip around the perimeter of the field and mow this area last. Most turtles are found within these areas,

and this provides time for them to react to the mowing activity and move out of the area. If the field is near a stream, start mowing the side furthest from the stream and work towards the stream. If the field is bordered by woodland, start mowing the side furthest from woodland and work towards woodland. If the field is bordered by a road, start mowing next to the road and work your way across the field.

- Mowing speed: Mowing in low gear or at slow speeds will allow turtles to react and move out of the field.
- Non-mowing areas: Leave an unmowed field edge in high turtle use areas until after September 15.
- Once exclusionary fencing has been installed surrounding the work area, a qualified individual must survey the area to determine if there are any turtles or salamanders within the work area. If these species are identified, they are to be carefully moved to an area outside of the work area in a safe manner that will not harm them. If listed species of turtles or salamanders are identified, the qualified individual will document and report these findings to the CT DEEP in the manner identified within the NDDDB determination letter. Only when the qualified individual determines that no turtles are within the work area and that the site is secure from turtles re-entering can construction begin.
- Prior to commencing activity, a meeting is to be held with all construction personnel working within the exclusion area by the qualified individual to appraise them of the species description and their duties in regard to maintaining the security of the site. Should construction personnel encounter a turtle or salamander, the qualified individual will instruct personnel during this meeting on how to carefully remove the species from the site, how to document their findings and to report it to the qualified individual for reporting to the CT DEEP.

Mid-Construction:

- Prior to the start of work activity each day, the exclusionary fencing is to be inspected by construction personnel and all gaps or openings at the ground-level identified should be fixed or repaired immediately to prevent turtle and salamander access to the site. If a breach is identified, work shall halt until the qualified individual surveys the site and determines no turtles or salamanders are within the work area.
- All heavy machinery (active or parked) must be within the limits of the exclusionary zone or on paved surfaces. No machinery is to be parked in any turtle or salamander habitat (i.e., the area outside of the exclusionary zone).
- At the end of each workday, the exclusionary measures at the entrance to the work site must be reimplemented to prevent turtles and salamanders from accessing the site. If this is not done, the exclusionary zone is considered void and a qualified individual must re-survey the site and conclude that no turtles or salamanders are present within the work area before construction activity can begin again.

Post-Construction:

- After completion of the project, exclusionary fencing shall be removed once the area is stabilized to allow for reptile and amphibian passage to resume. If cordoning off segments of the worksite to be completed in separate phases, once these areas are stable, only then may exclusionary fencing be removed. All active areas must remain exclusionary to turtles and salamanders.

In addition to these measures, the CT DEEP recommends the following be implemented into the general site design for the development to increase the value of habitat for wildlife and state listed species:

- A site management plan to promote native vegetation growth in the area under the solar panels

should be created.

- Use of wildlife-friendly fencing to allow wildlife movement to and from the development.
- A management plan for areas of the property where development is not occurring and/or for when solar panels are decommissioned that will support state listed species.

The NDDDB Determination, dated August 31, 2023, is attached in Appendix D. This determination is valid until August 31, 2025.

3.5.2 USFWS CONSULTATION

The US Fish and Wildlife Service (USFWS) provides an online planning tool, its Information for Planning and Consultation (IPaC) system, allowing for project planners the ability to perform a regulatory review for protected species under the Endangered Species Act (ESA) that inhabit or potentially may inhabit their project sites. This resource is designed to provide a list of potential ESA-protected and/or candidate species, migratory bird species protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, critical habitats, as well as the ability to consult whether a proposed project has the potential to result in “take” of listed species. “Take” refers to any means to “harass, harm, shoot, wound, kill, trap, capture or collect, or attempt to engage in any such conduct to threatened and endangered species”. In consulting this resource, projects can determine whether they are in compliance with the ESA and other federal acts. Solli Engineering filed on July 21, 2023, an IPaC review of the Project and received a letter report from the USFWS titled “*List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project*”. This report is attached in Appendix C. The report specifies that one endangered species, one candidate species and eleven migratory bird species have the potential to be impacted by the proposed project. The endangered species is the Northern Long Eared Bat, the candidate species is the Monarch Butterfly and the migratory birds are listed in the report in the attached Appendix C.

The Northern Long Eared Bat is listed as endangered under the ESA. This species range encompasses the entirety of Connecticut. The CT DEEP has compiled a map of towns with known Northern Long Eared Bat and other bat hibernacula within the state, and no known hibernacula are located within the Town of Berlin. The nearest hibernacula according to the map is within the Town of Berlin, approximately 20 miles south of the Project. For more information regarding the locations of NLEB areas of concern, refer to Figure 7, Natural Diversity Database Map. Regardless, to comply with the ESA, the IPaC Consultation Package Builder (CPB) was utilized to assess whether the project would result in the “take” of Northern Long Eared Bats. The results of the CPB can be found in the attached report “*Consistency letter for the ‘Proposed Solar Photovoltaic Array’ project indicating that any take of the northern long-eared bat that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR § 17.40(o)*” found in the attached Appendix C. Per the letter, no USFWS consultation is required regarding the project and the “take” of northern long eared bat and Indiana bats.

The monarch butterfly is a candidate species for protection under the ESA. Candidate species are “species which the USFWS has sufficient information to propose as endangered or threatened under the ESA, but for which their development of a proposed listing regulation is precluded by other higher priority listing activities”. As such, until they are proposed for listing, these species are not officially entitled to legal protection under the ESA, and they are not considered when making a determination as to “take.”

3.6 SOILS & GEOLOGY

The project grading is expected to generate a net export of approximately 190 cubic yards of material. Before any fill material is removed or used, the topsoil will be stripped and stockpiled for later seeding of disturbed areas. Any soil exposed due to construction will be treated according to the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*.

The following soils exist within the project area:

1. Wilbraham and Menlo soils, 0 to 8 percent slopes, extremely stony.
2. Raypol silt loam.
3. Scarboro muck, 0 to 3 percent slopes.
4. Ellington silt loam, 0 to 5 percent slopes.
5. Branford silt loam, 3 to 8 percent slopes.
6. Manchester gravelly sandy loam, 3 to 15 percent slopes.
7. Manchester gravelly sandy loam, 15 to 45 percent slopes.
8. Holyoke-Rock outcrop complex, 3 to 15 percent slopes.
9. Holyoke-Rock outcrop complex, 15 to 45 percent slopes.
10. Rock outcrop-Holyoke complex, 3 to 45 percent slopes.
11. Wethersfield loam, 3 to 8 percent slopes.
12. Wethersfield loam, 15 to 35 percent slopes, extremely stony.

For more information, refer to the map Figure 8, Prime Farmland Map.

3.6.1 PRIME FARMLAND SOILS

Solli Engineering has reviewed the listed soils in accordance with the Code of Federal Regulations (“CFR”) Title 7, part 657. Prime Farmland Soils are distinguishable based on soil type. These soils are to be identified under CFR Title 7, part 657 in order to know the extent and location of the best land for producing food, feed, fiber forage, and oilseed crops. Upon review, the project contains some prime farmland in the north and south portions of the Site. For more information, refer to the map Figure 8, Prime Farmland Map.

An agricultural field and wetlands cover the majority of the site. Because the expected use of the Project will have a finite lifespan, the Petitioner proposes to use minimally intrusive methods during construction when possible. Grading will be limited by the use of solar panel tracker systems and construction of solar panels in existing areas where grades are similar to proposed conditions. There will be some excavation and regrading that takes place on prime farmland to properly develop the Site as a whole. In areas where Prime Farmland Soils are disturbed, the developer will remove the topsoil, segregate it from underlying horizons, and stockpile and spread it throughout the Project as necessary to re-establish vegetation growth.

When the solar panel facility reaches the end of its finite lifespan, the facility will be decommissioned. Upon this development, all areas disturbed by the facility will be top dressed with native soils and reseeded with the same (or approved equivalent) pollinator blend that exists within the area of the solar panel facility. These proposed design strategies will not materially affect the prime farmland. According to Public Act No. 17-218, “for a solar photovoltaic facility with a capacity of two or more megawatts, to be located on prime farmland or forestland... the Department of Agriculture represents, in writing, to the council that such project will not materially affect the status of such land as prime farmland or the Department of Energy and Environmental Protection represents, in writing, to the council that such project will not materially affect the status of such land as core forest.” The Project is a 0.99 MW AC solar photovoltaic facility; therefore, a letter to the Council of the Department of Agriculture is not necessary in this exhibit.

3.7 HISTORIC & ARCHAEOLOGICAL RESOURCES

Archaeological Consulting Services LLC performed a Phase 1A cultural resources assessment survey on behalf of Solli Engineering and the Petitioner. Their report discloses that a property National Register of Historic Places does not exist within the Site.

Background research indicates a low sensitivity for potential prehistoric cultural resources. The low score can be attributed to the considerable distance to the nearest major water source, Stocking Brook, which is located over 500 feet away to the west. This conclusion was reached by means of a literature search for

previously recorded cultural resources in the area, a review of historical maps and aerial imagery depicting the project area, and a pedestrian survey complete with photo documentation of the project area to determine archaeological sensitivity. The land records and historic maps indicate that there is a possibility that previous historic occupations could be located along Butler Street directly adjacent to Chamberlain Highway.

ACS recommends a Phase 1B archaeological reconnaissance survey, limited to an area within the Project and 300 feet of Butler Street that was the original course of Chamberlain Highway. This survey would likely contain a number of standard-size shovel tests. For more information refer to the Phase 1A report in Appendix E, Cultural Resources.

3.8 SCENIC AND RECREATIONAL AREAS

All scenic roads are located over one mile away from the project. No hiking trail exists on or nearby the Site. The closest open space is located at Cuno Camp, approximately one-half mile east of the Project. For more information regarding resources located within one mile of the site refer to Figure 9, Scenic & Recreation Map.

3.9 LIGHTING

Permanent exterior lighting is not planned for the Project. During routine maintenance of the Facility there may be times when equipment with small lights will be present. These small lights will only be activated during maintenance.

3.10 FAA DETERMINATION

The closest federally-obligated airport is Hartford-Brainard located approximately 14 miles northeast of the Site.

Solli Engineering has submitted the required project information to the Federal Aviation Administration (FAA) for review. The FAA reviewed eight (8) sample points to determine whether a potential hazard exists for air navigation. Upon review, the FAA issued a Determination of No Hazard to Air Navigation for all points; therefore, a glare analysis is not required at this time. For more information see Appendix G, FAA Determinations.

3.11 VISIBILITY

There will be solar trackers a maximum of 6-ft off finished grade within the solar panel facility. All disturbed areas will be contained within a 7-ft chain link fence. Trees constituting the existing tree line will be preserved and maintained to the best of the developer's ability. Most neighbors in the vicinity the subject property will only be able to view the solar panel facility on a seasonal basis due to tree coverage. For more information refer to Figure 10, Proposed Conditions Viewshed Map.

The solar panel products are designed in such a way that they are not highly reflective. Because the solar panel have tracking features, the panels will not reflect one direction for extended durations.

3.12 NOISE

The Site is currently being used as an agricultural field. As such, noise generated from the Site is from the use of farming machinery.

Noise from the construction of the solar panel facility is exempted under Connecticut regulations for the control of noise. For more information refer to RCSA 22a-69-1.8(h). During construction, the increase in noise will likely lead to a subsequent elevation in ambient sound levels in the immediate vicinity of the Project. Standard construction equipment will be used for the Project, and the highest level of noise

generated from this equipment - such as backhoes, bulldozers, cranes and trucks – is expected to be approximately 88 dBA from the origin.

When construction ceases, noise from the solar panel facility will be minimal. The maximum amount of noise will be generated by inverters, during operation hours, which will emit 61 decibels measured at one meter from the inverter. The collective operational noise level of the inverters at the nearest property boundaries would be 36 decibels. This noise level meets applicable CT DEEP Noise Standards, and noise levels will effectively be reduced to zero during nighttime hours when the array is not generating electricity. For more information regarding the inverter product information refer to the specification sheets in Appendix F.

4.0 CONCLUSION

As demonstrated by the information outlined herein, the Project will have no air emissions, no significant adverse environmental impacts, and will comply with the CT DEEP air and water quality standards. The Petitioner, therefore, respectfully requests that the Council issue a declaratory ruling that the proposed Project will comply with CT DEEP air and water quality standards, will not have a substantial adverse environmental impact, and does not require the issuance of a Certificate.