Connecticut Valley Environmental Services, Inc.
Charlestown, New Hampshire

October 1, 2025

Mr. Christopher Little
Ecos Energy
80 S 8th St, Suite 900
Minneapolis, MN 55402

via email: chris.little@ecosenergy.com, steve.broyer@ecosrenewable.com,

Re: Survey for *Lysimachia quadrifolia* on the Borrelli Solar Project Site
179/197 Borrelli Road, East Haven, Connecticut, NDDB Filing 98550

Dear Mr. Little:

At your request, we surveyed the proposed Borrelli Solar Project Site for *Lysimachia quadrifolia,* whorled loosestrife. This letter provides the results of that survey, including the location and areal extent of an existing whorled loosestrife population, and suggests an area on the Project Site where the plants can be transplanted in order to avoid impact from project activities.

Jim McClammer of Connecticut Valley Environmental Services, Inc. ("CVES") conducted site visits on June 29 and 30, 2025. Mr. McClammer surveyed the entire 8.1-acre area of proposed disturbance within the 12.95-acre project site. Only one population of *Lysimachia quadrifolia* was identified. It is located on top of the traprock outcrop (see *Figures 1* and *2*) and within an area proposed for solar panels for the northerly portion of the proposed solar array (see *Figure 3*).

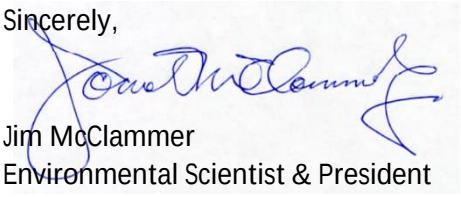
At the time of the site visits the whorled loosestrife plants had just passed anthesis and fruit was developing (see *Figures 4-8*). The population consists of approximately 250 individuals and covers an area of approximately 315 square feet. The perimeter of the population was flagged in the field with orange tape and surveyed with an iPhone GPS.

The location of the population appears to have been cleared of vegetation and stripped of topsoil years ago. It is an early successional meadow. Existing soils are very shallow to bedrock, and few trees shade the location. Associated plant species include sweet-fern (*Comptonia peregrina*), Japanese honeysuckle (*Lonicera japonica*), autumn-olive (*Elaeagnus umbellata*), Deptford pink (*Dianthus armeria*), early goldenrod (*Solidago juncea*), Bush clover (*Lespedeza* cf. *hirta*), dwarf cinquefoil (*Potentilla canadensis*), and seedlings of black oak (*Quercus velutina*) and cherry birch (*Betula lenta*).

A proposed transplant area on the southeast corner of Project Site is identified in *Figure 3*. We recommend that before the plants are relocated to the transplant area that the vegetation is removed and soils are fine-graded to closely replicate site conditions of the whorled loosestrife population.

Please feel free to contact me at McClammer@aol.com if you have any questions or need additional information.

Sincerely,

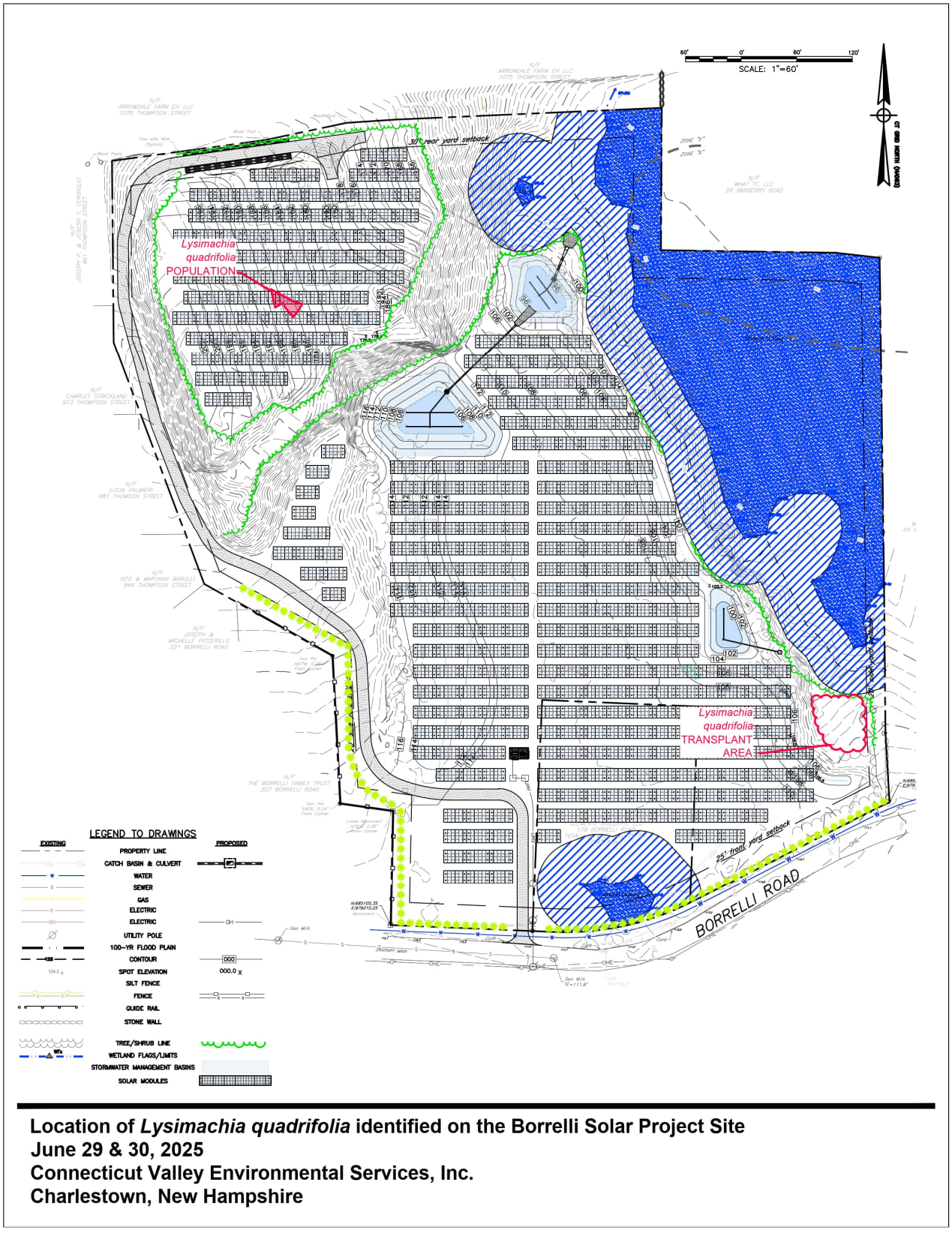


Jim McClammer
Environmental Scientist & President
Connecticut Valley Environmental Services, Inc.
391 River Road
Charlestown, NH 03603

Figure 1. Location of whorled loosestrife population on top of traprock outcrop. Photo taken June 30, 2025, looking north.

Figure 2. The whorled loosestrife population occurs in an open area on very shallow soils. The perimeter of the population was delineated with orange flagging tape and surveyed with GPS. Photo taken June 30, 2025, looking north.

Figure 3.



Location of *Lysimachia quadrifolia* identified on the Borrelli Solar Project Site
June 29 & 30, 2025
Connecticut Valley Environmental Services, Inc.
Charlestown, New Hampshire

Figures 4-7. Representative photographs of whorled loosestrife plants showing faded flowers, developing fruit, and growth form. Photos taken June 29 & 30, 2025.