Greenskies Clean Energy LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4.25-megawatt AC solar photovoltaic electric generating facility located at 1010 and 994 Racebrook Road, Woodbridge, Connecticut

Prepared for

The Connecticut Siting Council

June 20, 2025

LIST OF APPENDICES:

1 Introduction

This is a Petition for a declaratory ruling, pursuant to Connecticut General Statutes §§ 4-176 and 16-50k, that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required for the development, construction, operation and maintenance of a proposed solar photovoltaic project (the "Project") proposed by Greenskies Clean Energy LLC ("GCE" or "Petitioner") in the Town of Woodbridge, Connecticut. The Project consists of the development of a 4.25-megawatt ("MW") alternating current ("AC") ground-mounted solar photovoltaic ("PV") system ("Facility") located at 1010 Racebrook Rd and 994 Racebrook Rd, Woodbridge, CT ("Property"). See Figure 1 – Site Location Map and Figure 2 – Proposed Project Areas Aerial.

GCE submitted the Project in response to a renewable energy RFP and was selected as one of the projects approved as part of the Shared Clean Energy Facility ("SCEF") Program. The Facility has been designated Project # SCEF33611. This project would promote increased generation from renewable energy resources and diversification of the State's renewable energy portfolio. The Tariff Terms Agreement Approval Date or In-Service Date for the Project is May 1, 2027.

Authorization by the Connecticut Siting Council ("Council") via approval of this Petition would allow the Petitioner to construct the Project and assist the State of Connecticut in achieving its goal of energy conservation and sustainability. Pending approvals, the Project will commence financing, detailed engineering, procurement, and construction efforts in 2025 and 2026, with commercial operation planned for the Project in 2027.

The Project is located on two parcels within the Town of Woodbridge Residential A zoning district and is comprised of approximately 22 acres of project area across the approximate 51 acres of host parcel acreage of the two parcels. See Figure 3 – Zoning Map. The Town of Woodbridge's Assessor's Office has the parcels listed as 3201-1520-1010 and 3201-1520-994. The parcels are currently owned by THE MALCOLM W BALDWIN FAMILY TRUST and BALDWIN SUSAN C TRUSTEE. See Figure 4 – Tax Parcel Map and Figure 5 – Survey.

2 Petitioner

GCE is a limited liability company with offices at 127 Washington Ave, North Haven, CT 06473. GCE is a fully integrated development platform that develops, finances, designs, constructs, owns, operates, and maintains clean, renewable-energy projects throughout the United States. In conjunction with its affiliate, Clean Focus Yield, GCE offers

integrated solar and battery-storage solutions to commercial and industrial ("C&I"), municipal, and utility customers. From beginning to end – origination through construction and then lifetime operation – customers work with a single delivery team. GCE focuses on delivering clean energy, peak performance, and maximum energy savings. Since 2009, GCE and other affiliates of Greenskies have constructed and are operating over 320 MW of C&I solar projects throughout the country. The power generated by the portfolio is sold under long-term contracts that are typically 20 years, and the majority of the buyers have investment-grade credit ratings.

GCE has developed, owns and operates other large-scale ground-mount projects in Connecticut, including but not limited to, a 16.78 MW AC facility in Waterford, a 5 MW AC facility in North Haven, a 5 MW AC facility in Stonington, a 5 MW AC facility in East Lyme, a 5 MW AC facility in North Stonington, and a < 1 MW AC system at the East Haven Landfill. As the Council is aware, GCE has other projects under construction in Connecticut. GCE's commercial clients include Target Corporation, Walmart, Inc., and Amazon.com, Inc., and our projects with them represent 136 MW across 276 sites in 16 states. According to the Solar Energy Industry Association, Target, Walmart, and Amazon are in the top six solar users at US-based facilities as of 2022[1]. GCE is the partner of choice for large corporations and owners of real estate seeking to take a company- or portfolio-wide approach to solar energy adoption, and GCE is consistently ranked as one of the top solar developers in the United States.

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

[1] See, https://www.seia.org/news/solarmeansbusiness2022

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

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3 Proposed Project

3.1 Project Area Overview

The Project's site is located on two parcels that total approximately 51 acres at Racebrook Road, Woodbridge Connecticut ("Host Parcels"). The Town of Woodbridge's Assessor Office has the parcels listed as 3201-1520-1010 and 3201-1520-994, currently owned by THE MALCOLM W BALDWIN FAMILY TRUST and BALDWIN SUSAN C TRUSTEE. See Figure 4 – Tax Parcel Map. The property has been used as a golf course until 2025. The proposed project would allow the landowners to keep the land in their family, as it has been for generations, while supporting the State's commitment to renewable energy.

3.1.1 Existing Site Land Use

The ±51 acre host parcels are primarily characterized by overgrown vegetation atop the existing golf course, with an access drive along its Southeastern boundary. To the north of the property are three residential dwellings, one of which is owned and occupied by

the landowner and their family. The south of the property is bounded by Wilbur Cross Parkway, a residential dwelling and a church. There is currently no farming activity on the property. Access to the Property will be through the access road attached to Racebrook Road. All construction, maintenance, and all other activities related to the Project Area will use the access road. See Figure 5 – Survey.

According to the Town of Woodbridge's Zoning Map, the land use of the parcels are a public golf course and residential vacant land. The parcels are located in the Residence A district of Woodbridge, which is is characterized by low density housing with minimum gross lot sizes of 65,000 square feet. The zone allows for certain uses to be permitted through a special exception permit. Some of the uses requiring a special exception permit are Commercial Farms of greater than 5 acres, Public Use Substations, Excavation + Fill (Natural Resources Removal, and Regrading + Fill as Accessory Use), Telecommunication Facilities, Golf Courses, and Schools of all types including dormitories. The Petitioner believes that the proposed project falls within the intensity of these uses allowed with a special exception permit in the Residence A district of Woodbridge.

3.1.2 Surrounding Land Use

The community of Woodbridge is characterized by rolling hills, wooded areas, and open spaces. The town is generally comprised of low-density residential lots. The project is located near a residential neighborhood, with the Rural District (T2), approximately 513 feet south of the site.

3.1.3 Project Area Alternatives

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

electrical grid. Every attempt is made to minimize adverse effects of development on the land.

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

3.2 Project Description

3.2.1 Site Access

The primary access point to the Project will be via a gravel access road at the Southeast of the site connecting to Racebrook Road. A proposed gravel access road would extend from the already existing road to the portion of the Property where the solar array is proposed. Petitioner would construct an approximately 2,100 linear foot internal gravel roadway within the Project area to provide centralized access to the proposed solar array, electrical equipment, and stormwater detention basins. Petitioner proposes the construction of the roadway on prepared subgrades with a gravel topping which would match existing grades to the greatest extent feasible. See Figure 6 – Proposed Project Layout and Appendix A – Sheet C-2.0 Layout and Materials Plan – Overall.

3.2.2 Solar Facility Design and Layout

It is currently anticipated that the Project will consist of photovoltaic (PV) arrays to be comprised of 670-watt and 615-watt panels (pending the state of module technology at the time of construction) arranged in a single-axis tracker layout, located in the best available area within the property while avoiding the region closet to the neighbors in order to minimize their view of the project, as well as avoiding wetland buffers and culturally significant areas and to maximize annual energy production while balancing environmentally responsible design. The panels will be mounted on steel racking with driven posts to a depth to attain sufficient structural capacity to resist the loads from the weight of the panels, as well as environmental loads including snow, wind, and seismic forces.

The current PV array on electrical site plan has a nameplate capacity of 4.125 MW AC and is designed with 127 strings, with a total of 7,098 modules. There would be 24 125 kW inverters that are to be centralized within the array and mounted to or adjacent to the racking structure. The DC capacity is 4.56 MW and the AC capacity is 4.125 MW. The DC to AC ratio is designed as 1.11. The power from the inverters would be directed to a transformer, meter, disconnects and switchgear prior to interconnecting with utility distribution feeder. The power will Interconnect to an existing electric distribution pole along Racebrook Road.

3.2.3 Electrical Interconnection

The interconnection application for the solar array was submitted to The United Illuminating Company on May 24, 2024. The proposed project is proposed to interconnect with the June Street Substation located via circuit 1608 13.8kV feeder and is approximately 0.952 miles from the solar project. The point of interconnection will be at an existing electric distribution pole along Racebrook Road.

In August 2024, The United Illuminating (UI) Company completed an Impact Study for this project. UI is now conducting a Facility Study and then an Interconnection Agreement will be received. Petitioner is anticipating receiving an Interconnection Agreement in either Q4 of 2025 or Q1 of 2026.

3.2.4 Fencing and Site Security

Petitioner proposes a 7-foot-high chain link fence to be installed around the perimeter of the solar array fields to provide site security, as well as to address National Electric Code requirements. The perimeter fencing would extend around the entirety of the array area. There would be multiple access gates, with locking hardware, proposed along the perimeter for access to and from the solar array. See Appendix A – Sheet C-2.0- Layout and Materials Plan.

3.3 Stormwater Management

Under existing conditions, the project site generally drains overland flow from stormwater off the site to the west towards existing wetlands. Therefore, a single design

point has been selected where stormwater flows to portions of the existing wetland complex along the western edge of the development area. The installation of five (5) permanent stormwater basins is proposed as part of the project to capture, detain, and infiltrate tributary Project runoff before it is released into surrounding wetlands or forested areas.

3.4 Construction Schedule and Phasing of Construction

Project construction is anticipated to begin in Spring/Summer 2026 pending regulatory approvals. Initial work would involve the installation of erosion and sediment control measures, including installation of sediment traps.

Formal construction notice-to-proceed would be anticipated in Spring/Summer 2026, with delivery of equipment likely commencing in Summer 2026. As each discrete area of installation is completed, the ground surface would be stabilized, although best management practices will remain in place until final stabilization occurs.

Final installation of array equipment and landscaping/screening measures would be anticipated in Summer or Fall of 2026. Final site stabilization, testing, and commissioning would be expected to be completed in the late Fall of 2026. Construction activities would be expected to occur Monday through Friday between the hours of 6:30 a.m. and 5:00 p.m. Notice will be provided to the Council in the event that Saturday work is planned. A draft construction schedule timeline is included in Sheet C-5.02 in Appendix A.

The construction sequence for the Project begins by defining a weekly qualified inspector, emergency contact, and tentative schedule of all inspections, as well as holding a pre-construction meeting with representation from the general contractor, site contractor, CTDEEP, Conservation District, Town of Woodbridge, the engineer of record, and the qualified inspector. The contractor will contact Call-Before-You-Dig and notify the Town of Woodbridge at least 48 hours prior to commencement of any construction activity. Upon achieving completion of construction and final site stabilization, the engineer of record would investigate the Site and all temporary erosion controls shall be removed.

Prior to construction, a health and safety plan would be finalized by the contractor and would address not only the specific characteristics of the Project site and the Project, but also will reflect the nature of the surrounding land uses. A Storm Water Pollution Control Plan (SWPCP) would also be developed and implemented by the project civil

engineer that will include regular inspection of erosion control measures to prevent sedimentation or water quality impact. The Stormwater Management Report (Appendix E) provides Erosion and Sedimentation Control Best Management Practices – Maintenance/Evaluation Checklists for Construction Practices and Long-Term Practices. Construction sequencing is described in detail on Sheet C5.02 in Appendix A.

3.5 Operation and Maintenance

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

3.6 Decommissioning

At the end of the Project life, decommissioning would include disassembly and removal of above-ground structures, removal of subsurface structures to a minimum depth of 24 inches below grade, and re-grading and restoration of disturbed areas. Where reasonably required, restoration would include regrading, seeding, and mulching to establish vegetation and prevent soil loss and erosion.

Racking posts pulled from the ground are expected to create minimal ground disturbance. Any disturbed areas will be seeded with the same seed mix used across the site during the life of the Project or, if landowner prefers, another acceptable mix would be selected.

At the time of decommissioning, the Project owner would submit to the Town of Woodbridge and the Connecticut Siting Council a request plan for continued beneficial use of any components to be left on site, as requested, and determined by the landowner, such as gravel roads, landscaping and/or visual screening and stormwater buffers.

Under the proposed decommissioning plan, the Project owner would be responsible for all decommissioning costs. Any additional permits or approvals required for decommissioning, removal, and legal disposal of Project components would be obtained before decommissioning activities begin. All activities would be conducted in accordance with all permits and applicable rules and regulations. Disposal of all solid and hazardous waste would be conducted in accordance with local, state, and federal waste disposal regulations.

Facility Materials/Equipment

PV facilities are constructed using the same basic materials and methods of installation common to their application. Materials include:

Metals: Steel from pier foundations, racking, conduits, electrical enclosures, fencing; aluminum from racking, module frames, electrical wire, and transformers; stainless steel from fasteners, electrical enclosures, and racking; copper from electrical wire, transformers, and inverters.

Concrete: Equipment pads and footings.

PV modules: PV Modules are typically constructed of glass front sheets (some use glass back sheets as well), plastic back sheets and laminates, semiconductor rigid silicon cells, internal electrical conductors (aluminum or copper), silver solder, plus a variety of micro materials. The semiconductor PV cell materials represent a very small part of a PV module's weight, between 1 and 2%. As manufacturers pursue lower-cost modules, thinner layers of semiconductor materials are used which reduces this percentage. The most commonly used semiconductor material for the construction of PV modules is silicon. Glass, aluminum, and copper are easily recyclable materials, and silicon can be recycled by specialty electronics recyclers.

Glass: Most PV modules are approximately 80% glass by weight.

Plastics: A limited quantity of plastic materials are used in PV systems due to a system's continuous exposure to the elements and long operational lifetime. Plastics typically are found in PV facilities as wire insulation, electrical enclosures, control and monitoring equipment, and inverter components.

Sequence of Decommissioning

The following sequence for the removal of the components will be used:

PV Site:

- Disconnect PV facility from the utility power grid;
- Disconnect all aboveground wirings, cables and electrical interconnections and recycle offsite by an approved recycling facility;
- Remove concrete foundations. Electric components and their foundations will be removed and recycled off-site by a concrete recycler;
- Remove PV modules and transport to recycling facilities for recycling and material reuse;
- Remove the perimeter fence and recycle off-site by an approved metal recycler; and
- Remove all waste.

Inverters/Transformers:

- Disconnect all electrical equipment;
- Remove all on site inverters, transformers, meters, fans, and other electrical components and recycle off-site by an approved recycler; and
- Remove all waste.

Access Road:

- The access road built on the project, and associated drainage infrastructure will remain as a means to access the site in the future, if landowners choose to do so and are granted permission from the Siting Council and Town.

4 Project Benefits and Needs

The Project is anticipated to provide multiple benefits to the state and region. As the Council is aware, the State of Connecticut aims to meet specific clean energy goals that

this Project helps support. Solar Projects supply renewable energy that helps to reduce greenhouse gas emissions, supports regional habitat conservation, promotes energy independence, and supports a robust and reliable grid.

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

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

The Project has received a 20-year PPA through the Shared Clean Energy Facility Program ("SCEF") program. This further demonstrates that the State has evaluated the Project and has determined that the Project will help to satisfy the State's need to meet its clean energy and zero-carbon goals.

5 State and Local Outreach/Input

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

On December 10, 2024, GCE initiated communication with the Town of Woodbridge. Correspondence between Mica Cardozo, the First Selectman, and Kristine Sullivan, the Land Use Analyst at the Acting Enforcement Office, have been ongoing. GCE attended a meeting to introduce the projects to the town on February 13, 2025. Mica Cardozo, the

First Selectman, and Anthony Genovese, the Administrative Officer and Director of Finance, were present at the meeting. GCE held a second meeting on April 8, 2025 with Kristine Sullivan, the Land Use Analyst at the Acting Zoning Enforcement Office and Justin LaFountain, the planning consultant to the Town and Town Plan and Zoning Commission, to review the detailed design and solicit feedback. In the meeting, questions about Project's life expectancy, permitting timeline, decommissioning, mowing, tree clearing, vegetation underneath the panels, and interconnection were addressed. For correspondence documentation, see Appendix N – Public Outreach.

On April 2, 2025, GCE mailed letters to the Project site abutters in Woodbridge providing an overview of the proposed Project. GCE received communication on April 4, 2025 from Bryan Kier, a direct abutter to the north of the project at 19 Homewood Road. On April 15th GCE received communication from Joe and Daniel Rosales at 1000 Racebrook Road. Concerns about visual impact were addressed in person. See Appendix N for the list of neighbors who received mailers, along with a sample mailer.

In addition, on May 22, 2025, the Project mailed formal notices to the site abutters as well as relevant governmental officials related to the Project. The information related to those notices is also included in Appendix N.

On January 15, 2025 GCE had a meeting with the Connecticut Department of Energy and Environmental Protection (CT DEEP) Concierge team where GCE addressed questions posed about stormwater controls, tree clearing, and visual and noise impacts.

A Request for Natural Diversity Data Base ("NDDB") State Listed Species Review was completed and distributed to CTDEEP Wildlife Division for review. In return, a Final Determination dated August 22, 2024, was provided by CTDEEP Wildlife Division. The Final Determination letter approves construction as proposed. A copy of this letter is included in Appendix H.

On March 20, 2025, GCE submitted a proposal to the Department of Agriculture. This included a Dual-Use Farm Plan, Vegetation and Soil Management Plans for both construction and post-construction phases, a soil health assessment, and related documentation. GCE received a letter of no impact to prime farmland from CT Department of Agriculture on April 25, 2025. See Appendix L for documentation related to CT Department of Agriculture correspondence and approval.

On May 13, 2025 GCE received a letter of no impact to core forest from the Connecticut Department of Environmental Protection's Forestry Division. A copy of this letter is included in Appendix K.

On May 14th, the Woodbridge Board of Selectmen voted to approve the project's encroachment onto the drainage easement.

6 Potential Environmental Effects/Inputs

6.1 Site/Community Setting & Scenic Character & Values

The Project Site includes approximately 22 acres on Racebrook Road and has operated as a privately-owned golf course for the past 35 years. The proposed solar installation will maintain the open character of the land by avoiding dense development and preserving its expansive nature.

The site is not located near any publicly used spaces, such as parks, trails, or ballfields. The existing tree line that is not proposed to be disturbed will provide some level of screening for homes around the project parcel. GCE is also working with neighbors to the north and south of the site, to minimize potential impacts, such as customizing screening solutions and potentially utilizing alternative style fencing for a more aesthetic appearance.

6.2 Public Health and Safety

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

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

Construction traffic relative to the site includes standard construction trucks, small earth moving equipment, and all-terrain forklift equipment. Vehicle trips would be relative to scheduled deliveries of the major materials such as solar racking, solar panels, electrical equipment to serve the solar site, and fencing materials to be installed around the perimeter of the solar field. Construction activity and associated traffic would generally take place from 6:30 AM to 5:00 PM daily Mondays through Fridays. Notice will be provided to the Council in the event that Saturday work is planned.

Potential pollutants that might be used on the site would include polyvinyl chloride ("PVC") glue for use with electrical conduit installations and carbon-based fuels for vehicles and equipment. The Petitioner anticipates that there will be less than one gallon of PVC glues and less than 25 gallons of fuel stored on-site. The Petitioner would keep all flammable liquids in code compliant cabinets and containers. The Petitioner would also keep spill kits in all vehicles and equipment on-site. The Petitioner would monitor chemical usage daily to ensure compliance to requirements. No risk of release to the environment is anticipated.

6.3 Noise

6.3.1 Noise Level Guidelines and Regulatory Requirements

Potential Project-related noise is regulated by General Statutes section 22a-69 and the Town of Woodbridge Noise Zone Standards Chapter 315 of the town's code of ordinances.

The Town of Woodbridge's Noise Zone Standards provides: "Excessive sound and vibration are a serious hazard to the health, safety, welfare and quality of life of the residents of the Town of Woodbridge; Each person has a right to and should be ensured an environment free from excessive sound and vibration that may jeopardize such person's health, safety, or welfare, degrade the quality of life, or cause economic damage; There exists a substantial body of science and technology by which excessive sound and vibrations may be substantially monitored and abated; and The health, safety, welfare and quality of life of Woodbridge residents shall be enhanced by the reduction, control and prevention of noise through an ordinance that regulates activities causing excessive noise within the territorial limits of the Town of Woodbridge." For the Class which the Property, and surrounding receptors, are located in, local ordinance prescribes a maximum level of 61 dBA for daytime hours or 51 dBA at property boundaries for nighttime hours.

General Statutes section 22a-69 is applicable to the proposed Project and requires the Project to meet the following sound levels: 61 dBA at the nearest residential property during the day (when the Project would be generating electricity); 51 dBA at the nearest residential property at night (When the equipment would not be emitting noise); 66 dBA at the nearest commercial/educational property; and 70 dBA at the nearest agricultural/industrial property. The statute also accounts for impulse and other types of noise. Construction noise is exempt from the statute.

6.3.2 Proposed Project-generated Noise

Due to the nature of the use, facility design, required equipment and distance from potential noise receptors, the proposed Project is expected to have no adverse noise-related impact on the surrounding area. Existing uses around the perimeter of the Project site are primarily residential, with a church located to the southeast of the project.

VHB completed an acoustical study that included modeling 9 receptor locations at the perimeter of the project site, against the abutting properties (sensitive receptor locations). Based on the modeling to include the future built condition, the acoustical study concluded that the operation of the proposed equipment will comply with CT DEEP's noise standards at the sensitive receptor locations. The sound levels attributed to the proposed equipment ranges from approximately 29 dB(A) at Receptor R08, 4 Bunker Hill Road, to 39 dB(A) at Receptor R02, 883 Greenway Road. These sound levels are below CT DEEP's daytime criteria of 56 dB(A) and the nighttime criteria of 46 dB(A) with a 5 dB(A) penalty applied for potential tonal noise.

No noise will be generated at night when the sun is not present and therefore this project will abide by the 46dBA sound requirement during nighttime hours. Despite that, the nighttime criteria are included in the acoustical study to demonstrate that project-generated sound levels still comply with the nighttime standard.

The nearest abutting property line to a noise-generating equipment pad is located at the western portion of the solar development (closest to Receptor R08) approximately 220 feet from the closest equipment pad.

The Acoustical Study has been included as Appendix M.

6.4 Air Quality

Because the Project is a solar energy generating facility, no air emissions will be generated during operations and, therefore, an air permit would not be required.

Temporary, potential, construction-related mobile source emissions would include those associated with construction vehicles and equipment. Any potential air quality impacts related to construction activities can be considered de minimis. Such emissions would be mitigated using available measures including limiting idling times of equipment; proper maintenance of all vehicles and equipment and watering/spraying to minimize dust and particulate releases. In addition, all on-site and off-road equipment would meet the latest standards for diesel emissions, as prescribed by the United States Environmental Protection Agency (USEPA) and, with the above mitigation measures, should reduce the exhaust emissions.

6.5 Visual Impact

The project site is currently visible from surrounding properties. Petitioner has reached out to two abutting property owners who may have a viewshed of the site, as well as the municipality of Woodbridge, to address any visual concerns. Petitioner is working to customize screening solutions that will minimize the impact on those affected, including mitigation screening and aesthetic, alternative-style fencing. Additionally, Petitioner is conducting a photosimulation study from multiple viewpoints to gain a clearer understanding of the project's appearance once completed.

6.6 Federal Aviation Administration Determination

The Petitioner used the Federal Aviation Administration ("FAA") Notice Criteria Tool to screen the Project Area to assess if the Project triggers the FAA Notice Criteria. The result of the initial screening on May 30, 2025, is that no additional notice is required for FAA. See Appendix J - FAA Documentation.

6.7 Environmental Site Assessment/Conditions

A site investigation by a Licensed Environmental Professional (LEP) from VHB investigated the project area for potential signs of contamination in September 2024. VHB performed a Phase I Environmental Site Assessment (ESA) and prepared a report summarizing the findings. VHB concluded that no Recognized Environmental Conditions (RECs) were identified on the site.

6.8 Site Soils and Geology

6.8.1 Existing Site Soils and Geology

Based upon a review of NRCS Web Soil Survey, the majority of soils in the development area are fine sandy loams carrying a Hydrologic Soil Group of "B" designation. It is

anticipated that Petitioner will perform in site test pits and percolation testing in the location of the proposed stormwater basins in support of a CTDEEP Stormwater General Permit application.

6.8.2 Preservation of Prime Agricultural Soils

A review of USDA soil mapping for the area indicates that approximately 11 acres of the project site are classified as prime farmland. Although the land has been used as a golf course for at least the past 35 years and has not supported agricultural activity during that time, GCE is committed to minimizing impacts on prime agricultural soils.

For this project, GCE has proposed a regenerative Solar + Farming approach, incorporating the planting of perennial forbs, warm-season grasses, and potentially herbs and pollinator-friendly species. This method supports soil health by maintaining continuous ground cover, promoting deep-rooted native perennials, and enhancing water infiltration and retention in the soil.

On March 20, 2025, GCE submitted a proposal to the CT Department of Agriculture. This included a Dual-Use Farm Plan, Vegetation and Soil Management Plans for both construction and post-construction phases, a soil health assessment, and related documentation. GCE received a letter of no impact to prime farmland from CT Department of Agriculture on April 25, 2025. See Appendix L for documentation related to CT Department of Agriculture correspondence and approval.

To further reduce disturbance to prime farmland soils, GCE has limited regrading to only what is necessary to meet access and stormwater management requirements set by the Connecticut Department of Energy and Environmental Protection (CT DEEP).

6.9 Historic and Archeological Resources

Heritage Consultants prepared a Phase 1A Cultural Resources Assessment Survey in August 2024. The survey identified that the majority of the site had a moderate to high sensitivity for archaeological resources and identified a stone wall (SW-1) within the project area, which was recommended for avoidance. Based on the Phase 1A Survey, a Phase 1B study was recommended within the project area. In December 2024, the Petitioner retained Heritage Consultants to conduct a Phase 1B shovel test. The results of the Phase 1B study concluded no specific findings of cultural significance and

therefore determined no further archaeological examination was necessary. The project has been designed to avoid SW-1. A copy of the Phase 1A and Phase 1B reports are included in Appendix F.

6.10 Wetlands and Watercourses

6.10.1 Wetlands Delineation and Methodology

Scientists from VHB completed wetland delineations of the site in June and July 2024. Wetland delineations were conducted in accordance with the USDA Soil Survey Manual, the US Army Corps of Engineers ("USACE") Wetland Delineation Manual and the Northcentral and Northeast Regional Supplement. Additionally, wetland and watercourses surveys were completed in accordance with DEEP's Inland Wetland and Watercourses Act and with the Town of Woodbridge Inland Wetlands and Watercourses Regulations.

6.10.2 Existing Wetlands and Watercourses

VHB mapped seven wetlands and six watercourses within the Property. These resources occur primarily along the western and southern edges of the project area. The watercourses generally convey water from pockets of wetland areas to larger complexes, with flow generally moving west towards the Wepawaug River. Figure 8 depicts the results of the wetland and watercourse delineation effort; detailed information on the methods and results of the wetland and watercourse survey is provided in Appendix G.

6.10.3 Vernal Pools

No habitat for vernal pools, or Potential Vernal Pools (PVP's) were discovered within or adjacent to the Project Area during the on-site field investigation in 2024 and VHB soil scientists attest that no further in-season surveys are required as part of the development.

6.10.4 Proposed Project & Mitigation

The Project has been designed to provide a vegetated buffer between the limits of disturbance and the described wetland systems to maintain an ecological edge zone that separates the solar development and stormwater features from the wetland communities. The wetlands will be further protected by incorporation of the permanent stormwater basins and vegetation at the site. The Project limits meet or exceed the

CTDEEP Stormwater General Permit's minimum suggested setbacks for both solar panels (100') and overall disturbance (50') to wetlands.

6.11 Wildlife & Habitat (NDDB)

6.11.1 Rare, Threatened & Endangered Plants and Wildlife

A Request for Natural Diversity Data Base ("NDDB") State Listed Species Review was completed and distributed to CTDEEP Wildlife Division for review. In return, a Final Determination dated August 22, 2024, was provided by CTDEEP Wildlife Division. It was found that no extant populations of Federal or State Endangered, Threated or Special Concern species were found to occur in the project area. The Final Determination letter approves construction as proposed. A copy of this letter is included in Appendix H.

6.11.2 Core Forest

On April 29, 2025 GCE submitted the proposed Project into the CT Department of Energy and Environmental Protection ("DEEP") Bureau of Natural Resources Division of Forestry for analysis that there would be no impact to Core Forest. On May 13, 2025 a letter was sent to the Council from the DEEP Bureau of Natural Resources Forestry Division that confirmed the Project would not materially affect the status of core forest. A copy of that letter is available in Appendix K.

6.12 Water Supply

No water for the construction of the facility will be sourced on site from either a well or utility hook up. All water used for construction will be trucked in. Minimal long-term water use will be required for operations for the purpose of cleaning modules and this water will also be trucked in.

6.13 Stormwater Management

It is anticipated that the Project will exceed 1 acre and will therefore apply for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities from DEEP under CGS §22a-430b. The Project will include five (5) permanent

stormwater basin to treat water quality and to mitigate potential increases in post-construction peak rates of runoff. Existing drainage patterns on the site will largely remain as is.

A stormwater report for the Project is provided in Exhibit I.

The plan set provided in Exhibit A outlines the best practices for erosion and sediment control to be implemented during the construction phase of the Project.

6.13.1 Existing Conditions

Under existing conditions, untreated stormwater runoff from most of the Project Area generally flows west from Racebrook Road. Essentially all of the development area is comprised of existing grass from the golf course, with limited areas of tree clusters. Generally, the Project Area is at its highest elevation along Racebrook Road, and slopes to the west for the entirety of the development area. The majority of the terrain slopes in the Project Area range from 5% to 15% with portions exceeding 15% where sharper drops to the existing wetlands or streams occur.

6.13.2 Proposed Conditions

In the proposed conditions, the stormwater management system for the Project has been designed to meet State standards described within the 2024 Connecticut Stormwater Quality Manual and the CTDEEP Stormwater General Permit, effective November 25, 2022. The system consists of stormwater management basins to the west along the western fenceline of the Project. A seed mix of either pollinator-friendly grasses and/or permanent turf forming grasses will be used to establish vegetation around the solar array system to help stabilize the topsoil from erosion, sequester nutrients and pollutants, and lower runoff rates. The only impervious surfaces created by the Project will be located on a de minimis square footage of equipment pads. Access roads that are proposed are planned to be constructed using gravel.

Post-construction stormwater runoff will be collected and conveyed to stormwater basins via an overland sheet flow to the maximum extent practicable. Along the fencelines, shallow swales are included in order to direct stormwater runoff to the proposed basins. From within basins, flow is directed over the spillway to the existing slopes adjacent to the facility. Water quality treatment is provided in the basin and infiltration of stormwater runoff into the ground has been promoted to the maximum extent practicable. Information and computations regarding proposed conditions hydrology is contained in the Stormwater Report in Exhibit I.

7 Conclusion

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

- The Project meets CT DEEP's air and water quality standards, with no material emissions associated with either construction or operation, and water quality standards associated with construction and operational stormwater management as a primary focus of the Project's design;
- The Project has been configured to avoid any substantial environmental impacts by utilizing land which has historically been managed grassland and which does not require mass earthwork activities; and
- The Project will not impact areas of core forest or prime farmland; and
- In addition, the Project is designed to minimize visibility from public viewsheds or from surrounding properties, and the Project will meet CTDEEP Noise Standards.

Given the benefits this Project will provide to the State of Connecticut, GCE respectfully requests that the Council approve this Project as currently designed and issue a declaratory ruling that a Certificate is not required.