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July 25, 2025

VIA ELECTRONIC MAIL AND HAND DELIVERY
Melanie Bachman, Esq.
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: 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 2.750-megawatt AC solar photovoltaic electric generating facility located on Artillery Road in Woodbury, Connecticut

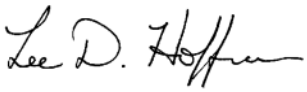
Dear Ms. Bachman:

I am writing on behalf of my client, Greenskies Clean Energy LLC, which is submitting the enclosed petition for a facility to be located at the above-referenced location in Woodbury, Connecticut. With this letter, I am enclosing the original and fifteen copies of the Petition, including Appendices A-N. I am also enclosing a check for $625.00, made payable to the Connecticut Siting Council.

Electronic copies of the filing are available for download at the following link: https://pullcom.sharefile.com/d-s9318ad1e5e5a4fc6be7ad5a0aa4e0d3c.

Should you have any questions concerning this submittal, please contact me at your convenience.

Sincerely,



Lee D. Hoffman

Enclosures

cc: Town Clerk, via electronic mail, Town of Woodbury, Connecticut
mmancini@woodburyct.org

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 2.750-megawatt AC solar photovoltaic electric generating facility located on Artillery Road in Woodbury, Connecticut

Prepared for

The Connecticut Siting Council

July 25, 2025

1.0 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 solar photovoltaic ("PV") project (the "Project") proposed by Greenskies Clean Energy LLC ("GCE" or "Petitioner"). The Project consists of the development of a 2.750-megawatt ("MW") alternating current ("AC") ground-mounted solar PV system ("Facility") located on Artillery Road in Woodbury, 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 request for proposal ("RFP") and it was selected in that RFP process. The 2.750-MW solar array was selected in the Non-residential Renewable Energy Solutions ("NRES") Program, and has been designated as Project # L3 - ESNRES-00844. This Project will 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 this Project is September 1, 2026.

Authorization by the Connecticut Siting Council ("Council") via this Petition will 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 entire Project in 2026.

The Project is located on one parcel within the Town of Woodbury Open Space Residence (OS-100) zoning district and is comprised of approximately 13.5 acres ("Project Area") on an approximately 61.9-acre site. See Figure 3 – Zoning Map. The Town of Woodbury's Assessor's Office has the parcel listed as 079-015. The parcel is currently owned by Beth and Carl Siemon and Taylor Markovits. See Figure 4 – Tax Parcel Map and Figure 5 – Existing Conditions Map.

2.0 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 2024[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. GCE brings years of industry knowledge and expertise at every level including project origination, design, engineering, construction and operation and

[1] See, https://seia.org/news/solar-means-business-2024/

maintenance. 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 and optimal electrical generation throughout the life of each project.

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

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3.0 Proposed Project

3.1 Project Area Overview

As noted above, the Project is located 13.5 acres of one parcel that totals approximately 61.9 acres at Artillery Road, Woodbury, Connecticut. The Property has been actively used to farm corn by tenant farmers for the last thirty years. The proposed Project would serve a dual purpose of contributing to the State's commitment to Renewable Energy as well as preserving the agricultural use of the land.

3.1.1 Existing Site Land Use

The 61.9-acre Property primarily consists of three agricultural fields, surrounded by areas of wetlands and forests. A stream runs between the northern and southern fields. To minimize impacts on sensitive natural resources, the Project Area has been located within two of the agricultural fields. An existing farm road extends from Quassapaug Road and connects the two northern fields. Access to the northern system will be via a new access road that connects to this existing farm road. Access to the southern system will be provided via a separate new access road extending from Artillery Road, located southeast of the Project Area. Construction, maintenance, and all other activities related to the Project will use these access roads. See Figure 5 – Existing Conditions Map.

According to the Town of Woodbury's Zoning Map, the land use of the Property is Open Space Residence (OS-100). The Open Space Residence zone of Woodbury is characterized by agricultural uses and low-density housing. The zone allows certain uses to be permitted via a special permit. Some of the uses requiring a special permit are Hospitals, Aircraft Landing Fields, Commercial Kennels, Child Day Care Centers, Public Utility buildings, and Extraction/Earth Removal. Petitioner believes that the proposed Project falls within the intensity of the uses allowed with a special permit in Open Space Residence District 100 of Woodbury.

3.1.2 Surrounding Land Use

This area of Woodbury, located approximately 3.75 miles northeast of the town center, lies primarily within the Open Space Residence District 100 and the Open Space District 60. The land surrounding the proposed Project consists largely of farmland, interspersed with residential homes and dense woodland. Directly north of the site is an extensive wooded area, a portion of which is owned by the Property's landowner. To the south and east, agricultural fields continue, with residential homes situated between them, to the southeast of the proposed Project Area. The proposed Project fits well within this part of town because it complements the existing rural and agricultural character of the area, preserves open space, and maintains low-density development consistent with surrounding land uses.

3.1.3 Project Area Alternatives

The Project Area was selected by GCE because it is suitable for a solar PV project and construction of the Project would have minimal impact on natural resources and surrounding environments. The Project as designed will not have adverse effects on quality forested areas, agricultural land, or wetlands, and the Project will not diminish the quality of life of those who live in the vicinity. It was also important to GCE to select a site that allows interconnection of the generation facility to a feeder and substation of the utility company that is compatible with its grid and goal of better serving customers. The proposed Project Area allows for interconnection to the Eversource distribution grid at a cost that is viable and avoids long term studies or any negative impacts to the electrical grid. Every attempt 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 Property. GCE evaluates the effects of solar development on selected sites by using third-party consultants, conducting site visits, analyzing internal data, reviewing public information, and applying minimal impact requirements to understand biological, environmental, historical, and archaeological impacts. While all developments have 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 Project will have two access points. One will be via the southeast corner of the parcel on Artillery Road, and the other will be on the West side of the parcel on Quassapaug Road. Petitioner will construct two internal gravel roadways. The proposed gravel roadways would partially follow existing farm roads, and the gravel road from Artillery Road would extend ±1400 linear feet from the road to the proposed equipment, while the new gravel road from the dirt road off Quassapaug Road would extend ±275 feet. 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 – Permit Plan Drawing Set - Overall.

3.2.2 Solar Facility Design and Layout

The Project is expected to include PV arrays using 670-watt and 615-watt panels, subject to available module technology at the time of construction. These will be arranged in a single-axis tracker layout and situated in the most suitable areas on the Property. The layout will avoid regions close to neighbors to reduce potential visual impacts, and steer clear of wetland buffers and environmentally sensitive areas. The goal is to maximize annual energy production while ensuring 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 the electrical site plan has a nameplate capacity of 2.750 MW AC and is designed with 117 strings of 24 Hanwha Q.Peak Duo ML – G12S 670W modules and 117 strings of 24 Hanwha Q.Tron XL-G2 615W modules, for a total of 5,616 modules. A total of 22 125 kW inverters are to be centralized within the array and mounted to or adjacent to the racking structure. The DC capacity is 3.608 MW and the AC capacity is 2.750 MW. The DC to AC ratio is 1.336 The power from the inverters would be directed to two transformers, a meter, disconnects and switchgear prior to interconnecting with the utility distribution feeder. The power will interconnect to the pole to the West of the access road at Quassapaug Road.

3.2.3 Electrical Interconnection

The interconnection application for the solar array was submitted to Eversource on February 25, 2022. The proposed Project is proposed to interconnect with the Carmel Hill 11S Substation located via circuit 11S14 feeder and is approximately 8.75 miles from the solar project. The point of interconnection will be at a pole to the West of the access road at Quassapaug Road.

In January 2025, Eversource completed an Impact Study for the Project, and initiated a Facility Study, which began in January of 2025 and is expected to be complete in Q3 or Q4 of 2025. 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 chain link security fence. The 7-foot-high chain link security fence would be installed around the arrays to enhance security by preventing unauthorized access. This fence would be installed around the perimeter of the solar array fields to provide site security, as well as to address National Electric Code requirements. There would be one (1) 15-foot-wide double swing access gate at the entrance to each of the arrays with locking hardware, proposed along the perimeter for access to the arrays and permanent stormwater infrastructure. See Appendix A – Sheet C5.01 - Fence Details.

3.3 Stormwater Management

Under existing conditions, the Project Area generally drains overland flow from stormwater off the site to the central portion of the site towards existing wetlands and Frank Atwood Brook, or to the west towards Quassapaug Road. Several design points have been selected where stormwater flows to portions of the existing site along the edges of the development area. The installation of six (6) 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. It is currently anticipated that a temporary staging area would be centrally located within the Project Area pending future selection and consultation with an EPC contractor.

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, and best management practices will remain in place until final stabilization occurs.

Final installation of array equipment and landscaping/screening measures would be anticipated in 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 Saturday 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 sequencing schedule is included in Sheet C4.01 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, the Connecticut Department of Energy and Environmental Protection ("CT DEEP"), the Woodbury Conservation District, the Town of Woodbury, the engineer of record, and the qualified inspector. The contractor will contact Call-Before-You-Dig and notify the Town of Woodbury 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 would 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 Area and the Project but also will reflect the nature of the surrounding land uses. A Storm Water Pollution Control Plan would also be finalized and implemented by GCE under the direction and assistance of the Engineer of Record, which 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.

Further details regarding Construction Sequencing and Scheduling are included within Sheet C4.01 in Appendix A.

3.5 Operation and Maintenance

GCE has a dedicated Operations & Maintenance 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 AlsoEnergy'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 the landowner prefers, another acceptable mix would be selected.

At the time of decommissioning, the Project owner would submit to the Town of Woodbury and the 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, such 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;
- 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;
- Remove all waste.

Access Road:

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

4.0 Project Benefits and Needs

The Project is anticipated to provide multiple benefits to the Town of Woodbury, the State of Connecticut, and the rest of New England. As the Council is aware, the State of Connecticut aims to meet specific clean energy goals that this Project helps support. Solar projects supply renewable energy that helps reduce greenhouse gas emissions, supports regional habitat conservation, promotes energy independence, and supports a robust and reliable grid.

High levels of greenhouse gas emissions have been linked to changes in the climate, as well as health risks for the population. The resulting climate change alters regional and

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

The Project's energy generation will also align with Connecticut's seasonal and time of day peak energy needs. Given that the Project will produce energy during the day when power is generally consumed, it is anticipated that it will have benefits that the Council has recognized pursuant to Conn. Gen. Stat. § 16-50p. The timing of this generation can help the grid support changes in the loading of the system and thus supports a more robust grid. ISO New England recently shared that distributed solar reduced the amount of electricity consumed by New Englanders in 2024 by about 5%.[2] 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 an award with the State's NRES 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.

5.0 State and Local Outreach/Input

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

On January 15, 2025 ,GCE had a meeting with the CT DEEP Concierge team. GCE addressed questions posed about stormwater controls, fencing, and visual and noise impacts.

[2] https://isonewswire.com/2025/07/09/solar-power-reduced-new-england-power-grid-demand-by-5-in-2024/

A Request for Natural Diversity Data Base ("NDDB") State Listed Species Review was completed and distributed to CT DEEP Wildlife Division for review. In return, a Final Determination dated August 30, 2024 was provided by CT DEEP Wildlife Division. It identified Eastern Box Turtles as a State-listed species near the Project Area and recommended a site management plan, along with several other additional steps to protect the turtles.

On February 10th, GCE met with the abutters that own 43 Artillery Road, David and Michael Logue. The Logues currently farm the site and met with GCE to discuss the Project and the potential for the Logues to continue farming the Property. On April 8th, despite being offered compensation to farm or maintain the Property, the Logues declined to continue farming the site. On July 11th, GCE notified the Logues that if they reconsider, GCE would be interested in working with them.

On April 28th, GCE submitted a request for a letter of impact to the Connecticut Department of Agriculture. On June 26th, the Department of Agriculture issued a letter of no material impact for the Project.

On July 2nd, GCE submitted a request for a letter of impact to CT DEEP Forestry Division. On July 3rd, the Forestry Division issued a letter of no material impact for the Project.

On July 10th, GCE met with representatives of the Town of Woodbury to introduce the Project including the First Selectman, Barbara Perkinson, the Planner William Agresta, the Fire Marshall Janet Morgan, and the assessor Rae Ann Walcott. For correspondence documentation, see Appendix N – Local Outreach.

On July 9th, GCE mailed letters to the Project site neighbors in Woodbury providing an overview of the proposed Project.

6.0 Environmental Considerations

6.1 Site/Community Setting & Scenic Character & Values

The Project Area consists of approximately 13.5 acres on a parcel of 61.9 acres and is located on Artillery Road. The Property has been actively leased for corn cultivation over the past 30 years. GCE proposes a dual-use solar development that integrates renewable

energy generation with continued agricultural use. Depending on site conditions and market demand, the farming strategy may rotate among viable practices such as vegetable row cropping, shade-tolerant specialty crops, perennial culinary herbs, and small fruit and berry production. The proposed Project would thus serve a dual purpose of contributing to the State's commitment to Renewable Energy as well as preserving the agricultural use of the land. See Appendix L for the Department of Agriculture Materials, including the Agrivoltaics Farm Plan.

This Project Area is in the Open Space Residence District (OS-100). Development in Open Space Districts have the following objectives as outlined by Woodbury's Zoning Regulations: "Preservation and enhancement of the character of existing development, e.g. preservation of rural character, streetscapes and/or provision for aesthetic transition between dissimilar uses; B. Preservation, conservation and protection of natural features and resources, e.g. tree cover, open areas, wetlands and water related resources and other environmentally significant features; and C. Preservation and protection of scenic views and vistas and historic and archeological sites." The Project supports ongoing agricultural activity while protecting the area's natural and cultural resources, which aligns with the values of this district.

The site is not located near any publicly used spaces, such as schools, parks, trails, or ballfields. This site is largely surrounded by open space agricultural fields, barns, and forest, with a couple of residences to the southeast of the Project Area. The existing tree line will provide a large level of screening for areas around the Project parcel. See Fencing Detail on Sheet C5.01 in Appendix A.

6.2 Public Health and Safety

The proposed Project is not expected to create any adverse impact with regard to public health or safety. 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.

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. Petitioner anticipates that there will be less than one gallon of PVC glues, and less than 25 gallons of fuel stored on-site. Petitioner would keep all flammable liquids in code compliant cabinets and containers. Petitioner would also keep spill kits in all vehicles and equipment on-site. Petitioner would monitor chemical usage daily to ensure compliance with 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 Connecticut General Statutes § 22a-69, which requires the Project to remain below 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 some accessory equipment might still be in operation); 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. The Town of Woodbury does not currently have separate noise limits.

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 Area are residential and agricultural.

VHB completed an acoustical study that included modeling 8 receptor locations at the perimeter of the Project Area 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 the state noise standards at the sensitive receptor locations. The sound levels attributed to the proposed equipment ranges from approximately 29 dB(A) at Receptor R06, Eastern Property Line, to 38 dB(A) at Receptor R02, 1440 Main Street North (across Quassapaug Road). These sound levels are below the 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.

A negligible amount of noise will be generated at night when the sun is not present and therefore this Project will abide by the 46 dBA sound requirement during nighttime hours. The nighttime criteria is included in the acoustical study to demonstrate that Project-generated sound levels will 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 R02) approximately 265 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 and, with the above mitigation measures, should reduce the exhaust emissions.

6.5 Visual Impact

Due to large amounts of adjacent woodland and rolling topography, the Project Area is currently visible only on the southern field from surrounding properties to the east. The northern field is not visible from any direction due to the density of the forest around the site. Petitioner is working to customize screening solutions that will minimize the impact on those affected, including mitigation screening as necessary. Additionally, Petitioner has included Visual Cross Sections as Appendix I that graphically show the view corridor from the two nearest residential locations. Both homes are more than 400 feet away from the nearest panels.

6.6 Federal Aviation Administration Determination

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 January 14, 2025, is that no additional notice is required for FAA. See Appendix J - FAA Determination.

6.7 Environmental Site Assessment/Conditions

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

6.8 Site Soils and Geology

6.8.1 Existing Site Soils and Geology

Based upon a review of the NRCS Web Soil Survey, the majority of soils in the development area are fine sandy loams carrying a Hydrologic Soil Group of "C" designation, with areas of "D" designations near wetlands. 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 CT DEEP Stormwater General Permit application.

6.8.2 Preservation of Prime Agricultural Soils

The site is currently used for agriculture, such as corn and soybean. A review of the USDA's soil mapping for the area indicates that the Project Area will be placed on approximately 8 acres of prime farmland. GCE is committed to minimizing impacts on prime agricultural soils.

For this Project, GCE has proposed a Solar and Farming approach, incorporating the planting of commercially saleable perennial plants such as herbs, in the interrow spacing of the panels. This method supports soil health by maintaining ground cover and enhancing water infiltration and retention in the soil, improving soil health over the lifetime of the Project.

On June 2, 2025, GCE submitted a proposal to the Department of Agriculture. This included a Dual-Use Farm Plan, Vegetation and Soil Management Plan, a soil health assessment, and related documentation. GCE received a letter of no impact from The Department of Agriculture on June 6th, 2025. See Appendix L for documentation related to 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 CT DEEP.

6.8.3 Agricultural Dual-Use

GCE is committed to the protection of Connecticut's prime farmland soils and understands the benefit that local agriculture brings to a community. GCE was the first solar developer in CT to develop and gain Department of Agriculture approval on a solar and agricultural co-use project. Since then, GCE has strived to push the growing agrivoltaics industry forward and innovate the best ways to combine solar and farming. In this proposed Project, GCE has created a Solar + Farming plan that balances the needs of renewable generation and the protection of prime farmland soils.

Potential herb species to be planted in between rows of panels under consideration are Oregano, Rosemary, Thyme, Lavender, and Elderberry. Other perennial herbaceous cash

crops may be selected and grown on-site, based on site suitability, changing market conditions, and the farmers' preference. Areas that will not be farmed, such as the areas underneath the arrays, and between the arrays and the fence line, will be permanently stabilized with a seed mix containing perennial grasses that will also include some forbs that can provide support for pollinator species. At a very high level, maintenance would include the following:

- Delayed mowing to ensure that the selected plants can reach harvest stage
- Harvesting of agricultural products
- Overseeding as needed to maintain sufficient land coverage of plants
- Removal of invasive plants as needed
- General monitoring and upkeep of the soil and plant health

Allowing these plants to grow without herbicides or pesticides for years—along with the stabilization and pollination provided by grasses and forbs—will enhance soil health and help preserve prime farmland soils.

GCE also developed a Vegetation and Soil Health Management Plan that was submitted to the Department of Agriculture, aiding in the overall preservation of prime farmland soils. This plan includes construction best management practices, short- and long-term maintenance practices, and methods for restoring prime farmland upon decommissioning of the Project.

In addition, the Facility will be designed to enable the successful implementation of the proposed farming activities. The Project is being designed to accomplish this goal with three specific attributes:

1) The lowest point of the solar modules will be raised higher than is needed for solar to allow for increased sunlight to the area below the modules. Raising panels also allows agricultural equipment to more easily fit down rows.

2) The inter-row spacing is designed to allow access for agricultural equipment to operate within the space between arrays, and the increased width also allows for sufficient sunlight levels.
3) The arrays will be oriented north-south to maximize available sunlight for plants to grow. There will be increased signage and fencing to ensure that farm workers are never exposed to unsafe conditions.

Please see Appendix L for further documentation related to Department of Agriculture.

6.9 Historic and Archeological Resources

Heritage Consultants prepared a Phase 1A Cultural Resources Assessment Survey in July 2024. The survey identified that a portion of the site had the potential to yield intact archeological deposits. Based on the Phase 1A Survey, a Phase 1B study was recommended within the Project Area. In December 2024, Petitioner retained Heritage Consultants to conduct a Phase 1B shovel test. The results of the Phase 1B study concluded that there were isolated areas outside of the Project's limits that contained low densities of archeological artifacts and identified three sites of interest, all outside of the Project's limits. The Phase 1B study therefore concluded that no adverse impacts would be caused by the Project. A copy of the Phase 1A and Phase 1B reports are included in Appendix F, as well as the State Historic Preservation Office's Concurrence Letter in agreement with the findings of the studies completed by Heritage Consultants.

6.10 Wetlands and Watercourses

6.10.1 Wetlands Delineation and Methodology

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

6.10.2 Existing Wetlands and Watercourses

VHB mapped five wetlands and two watercourses within the Property. These resources occur primarily along the center of the north and south fields of the Project Area. The watercourses generally convey water from pockets of wetland areas to larger complexes, with flow generally moving west towards the southeast of the Property. 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

VHB mapped one vernal pool within the Property on April 2, 2025. This resource occurs on the northeastern edge of the Project Area within a larger wetland. The vernal pool is approximately a 0.6-acre area that is classified as a cryptic vernal pool. A cryptic vernal pool will not entirely dry out and is part of the larger surrounding wetland area. Detailed information on the methods and results of the vernal pool survey is provided in Appendix G.

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 CT DEEP Stormwater General Permit's minimum suggested setbacks for both solar panels (100') and overall disturbance (50') to wetlands. The Project also meets the required CT DEEP minimum no-disturbance buffer of 100' to the mapped vernal pool.

6.11 Wildlife & Habitat (NDDB)

6.11.1 Rare, Threatened & Endangered Plants and Wildlife

A Request for NDDB State Listed Species Review was completed and distributed to CT DEEP Wildlife Division, which returned a Final Determination on August 30, 2024. It states that no extant populations of Federal Endangered, Threatened or Special Concern

species are known to occur within the Project Area. One State-listed species was noted, the Eastern Box Turtle. The Project Plans include the recommended site design measures recommended in the NDDB Determination for this species. A copy of this letter is included in Appendix H.

6.11.2 Core Forest

A review of the CT DEEP Forestland Habitat Impact Map indicates the presence of core forest within the tree lines surrounding the Project Area. However, no tree clearing is proposed as part of this Project. On March 6, 2025, GCE received a letter of no impact from the CT DEEP's Forestry Division. A copy of this letter is included in Appendix K.

6.12 Water Supply

All water used for construction will be trucked in, as opposed to the use of on-site wells or utilities. 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's ground disturbance will exceed 1 acre and GCE will therefore apply for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities from CT DEEP under Connecticut General Statutes § 22a-430b. The Project will include six (6) permanent stormwater basins 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 unchanged.

A stormwater report for the Project is provided in Appendix E.

The plan set provided in Appendix 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, runoff from the Project Area flows overland west of the site through the farmland and then through existing woodland towards Frank Atwood Brook. The site is generally at its highest elevation at the southeastern corner of the southern

field. The majority of the Project Area is comprised of undeveloped forest and farmland. Terrain slopes in the Project Area range from 1% to approximately 15%. Existing culverts under Quassapaug Road convey runoff across the road and into the adjacent farm fields or as a continuation of Frank Atwood Brook.

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 CT DEEP Stormwater General Permit, effective November 25, 2022. The system consists of stormwater management basins to the west along the western fence line 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. As part of this Project, it is anticipated that a dual-use agriculture crop will be provided, but will still rely on revegetation of the fields via the aforementioned grass mixes. 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 fence lines, shallow swales are included, as needed, 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 Appendix E.

7.0 Conclusions

The Project clearly meets the standards set forth in Connecticut General Statutes § 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 been unused and left fallow for decades;
- The Project will not alter areas of core forest;
- Petitioner has coordinated with the Department of Agriculture to promote agricultural co-uses, with the Department concluded that the Project would not materially affect the status of prime farmland; and
- The Project is designed to minimize visibility from public viewsheds or from surrounding properties, and there will be no impacts from noise.

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