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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 4.625-megawatt AC solar photovoltaic electric generating facility located on Gager Hill Road in Scotland, 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 Scotland, 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-s96efc350105246e2ab670481ed81cbf7>

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 Scotland, Connecticut
townclerk@scotlandct.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 4.625-megawatt AC
solar photovoltaic electric generating facility located on
Gager Hill Road in Scotland, 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 4.625-megawatt (“MW”) alternating current (“AC”) ground-mounted solar PV system (“Facility”) located on Gager Hill Road in Scotland, 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 4.625-MW solar array was selected in the Non-residential Renewable Energy Solutions (“NRES”) Program and has been designated as Project #LZ3 - ESNRES-00838. 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 would allow 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 entire Project in 2026.

The Project is located on two parcels within the Town of Scotland Residential Agricultural (RA) zoning district and is comprised of approximately 25.9 acres (“Project Area”) on an approximately 92.5-acre site. See Figure 3 – Zoning Map. The Town of Scotland’s Assessor’s Office has the parcels listed as 21 19 29 and 21 19 2. The parcels are currently owned by Carsey Unlimited LLC. 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-mounted 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 2024¹. 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

¹ See, <https://seia.org/news/solar-means-business-2024>

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.

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, consisting of 25.9 acres, is located on two parcels that total approximately 92.5 acres at Gager Hill Road, Scotland, Connecticut. The Property has been actively used for agriculture—alternating between corn and soybeans—since the current landowner acquired it. GCE proposes a dual-use solar approach, through farming commercially saleable perennial plants, such as herbs, within the Generation Footprint. The proposed Project would serve a dual purpose of contributing to the State's

commitment to Renewable Energy as well as preserving the agricultural history of the land.

3.1.1 Existing Site Land Use

The 92.5-acre Property consists primarily of three agricultural fields, along with areas of wetlands and forest. The 25.9 acre Project Area is sited within the open portion of the Property to avoid impacts to sensitive natural resources. A culvert crossing connects the western and eastern fields, and a dirt road extends from Gager Hill Road near the southeastern edge of the Project Area. Access to the Project Area will be via a new access road from Gager Hill Road, which will partially follow the existing dirt road. Construction, maintenance, and all other activities related to the Project will use the access road. See Figure 5 – Existing Conditions Map.

According to the Town of Scotland's Zoning Map, the land use of the parcels that comprise the Project Area is Residential Agricultural ("RA"). The RA zone of Scotland is characterized by "residential uses consistent with the furtherance of agricultural and rural businesses while maintaining the Town's rural character and protecting the Town's natural resources". This zone permits Commercial Agriculture/Farms via a Zoning Permit approval. The zone also allows certain uses to be permitted via Special Permit, including Sand and Gravel Extraction. Petitioner believes that the proposed Project falls within the intensity of these uses allowed with a Special Permit in the RA zone of Scotland.

3.1.2 Surrounding Land Use

The Town of Scotland is defined by its predominantly rural and agricultural character, with a landscape of open farmland and rolling forested hills. It includes two zoning districts: the Village District and the Residential Agricultural District. The majority of the town falls within the Residential Agricultural District, which is primarily made up of farms, rural businesses, and scattered residences. The Project site is surrounded by agricultural fields, woodlands, and a few nearby homes, and is located approximately 1,500 feet southwest of the Village District.

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 natural resources and environmental impacts. 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 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 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 Gager Hill Road in the southeast corner of the site. Petitioner would construct an internal 15-foot-wide gravel roadway extending from the southeast to the northwest, providing access to the three areas of solar arrays within the Project Area as well as the infiltration basins. The proposed gravel roadway would partially follow the existing dirt road and would extend 2,400 linear 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

It is currently anticipated that the Project will consist of PV arrays to be comprised of 670-watt and 615-watt panels (depending on 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 closest to the neighbors in order to minimize their view of the Project, as well as avoiding wetland buffers and environmentally sensitive areas. The proposed location also maximizes 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 the electrical site plan has a nameplate capacity of 4.625 MW AC and is designed with 163 strings of 26 Hanwha Q.PeaK Duo ML – G12S 670W modules and 189 strings of 24 Hanwha Q.Tron XL-G2 615W modules, for a total of 8774 modules. There will be 37 125 kW inverters that are to be centralized within the array and mounted to or adjacent to the racking structure. The DC capacity is 5.629 MW and the AC capacity is 4.625 MW. The DC to AC ratio is 1.217. The power from the inverters will be directed to a transformer, meter, disconnects and switchgear prior to interconnecting with the utility distribution feeder. The power will interconnect to the pole to the east of the access road at Gager Hill Road.

3.2.3 Electrical Interconnection

The interconnection application for the solar array was submitted to Eversource on May 31st, 2023. The proposed Project will interconnect with the Card Street 11F Substation located via circuit 11F13 feeder, which will be upgraded to three-phase distribution and is approximately 11.7 miles from the solar Project. The point of interconnection will be at a pole to the east of the access road on Gager Hill Road.

In August 2024, Eversource completed an Impact Study for the Project, and initiated a Transmission Cluster Study, which is anticipated to be completed in Q4 of 2025.

Eversource also required a Facility Study, which began in April of 2025 and is expected to be complete in Q3 or Q4 of 2025. Petitioner anticipates it will receive an Interconnection Agreement in either Q4 of 2025 or Q1 of 2026.

3.2.4 Fencing and Site Security

Petitioner proposes two types of fencing: an agricultural-style fence and a chain link security fence. The agricultural-style fence, which would be 8-foot-high and made of galvanized fixed knot wire mesh, would extend around the perimeter of each solar array. This fence is designed to demarcate boundaries and facilitate wildlife passage. The 7-foot-high chain link security fence would be installed in specific areas requiring enhanced security to prevent unauthorized access. Both fences are to 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) 20-foot-wide double swing access gate at the entrance to each of the three arrays with (1) 4-foot-wide personnel gate, with locking hardware, proposed along the perimeter for access to the arrays and permanent stormwater infrastructure. See Appendix A – Sheet C113 and C114- Fence Details.

3.3 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 C-102 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, Connecticut Department of Energy and Environmental Protection (“CTDEEP”), Town of Scotland, the engineer of record, and the qualified inspector. The contractor will contact Call-Before-You-Dig and notify the Town of Scotland 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 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, 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.

Further details regarding Construction Sequencing and Scheduling are included within Sheet C102 in Appendix A.

3.4 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.

3.5 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 Scotland 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 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 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 Scotland, 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.

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

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 December 17, 2024, GCE initiated communications with the Town of Scotland. Correspondence between Dana Barrow, the First Selectman, Wendy O'Connor, the Executive Administrator, and Isabelle Kisluk, the Zoning and Inland Wetlands Officer, have been ongoing. GCE attended a meeting to introduce the Project to the Town on January 23, 2025. Dana Barrow, the first selectman, Wendy O'Connor, the Executive Administrator, Isabelle Kisluk, the Zoning and Inland Wetlands Officer, and Jeffrey Jakubowski, the Co-Chairman of the Planning and Zoning Commission were present at the meeting. On April 1, 2025, GCE and Verdantas hosted an in-person public meeting to present the Project, introduce our teams, gather feedback, and answer questions from local residents and neighbors at 6:30 pm at Scotland Volunteer Memorial Hall. In the meeting, questions about Project life expectancy, site maintenance, stormwater design, permitting timeline, decommissioning, visual and noise concerns, community benefits, and interconnection were addressed. Following the meeting, GCE and Verdantas sent an RFI document to the First Selectman to address questions that couldn't be fully answered during the in-person discussion. Based on concerns voiced at this meeting and at the request of the First Selectman, GCE proposes agricultural style fencing and vegetative screening along the eastern side of the southern array, to mitigate potential visibility from Gager Hill Road and the residence at 54 Gager Hill Road. For correspondence documentation, see Appendix I – Public Outreach. See Appendix A Sheets C104 through C107 to see where vegetative screening and agricultural style fencing are proposed based on neighbor requests.

On February 19, 2025, GCE mailed letters to the Project site neighbors in Scotland providing an overview of the proposed Project. GCE received communication on March 1, 2025 from Heather Blanchard, a direct abutter to the south of the Project at 94 Gager Hill Road. Questions about environmental concerns, aesthetics, Project specifics and maintenance, and health and safety were addressed via email. GCE worked with Heather on visual concerns and agreed to do agricultural style fencing on the southern border of the array and vegetative screening along the property line. On March 5, 2025, GCE received communication from Tina Gauthier, a neighbor to the south of the Project at 150 Gager Hill Road. Concerns about the Project and how GCE presence impacts her land were addressed over a phone call.

On April 23, 2025, GCE received communication from Cindy Habeeb, a direct abutter to the north of the Project at 119 Huntington Road, via email. She expressed visual concerns and provided photo documentation of 6 different viewpoints during leaf-off conditions from her home facing the Project site. GCE is proposing agricultural style fencing along the northern portion of the northeastern array, where the Project may be visible from her property during leaf-off conditions. GCE also offered to conduct a visual simulation from her home, with no response back. On February 27, 2025, GCE contacted John Beck, a direct eastern abutter at 54 Gager Hill Road, to inquire whether his family might be interested in expanding their Alpaca farm onto the Project site. Although they declined the offer, Mr. Beck raised concerns regarding stormwater and runoff onto their property, which were addressed in a phone call. See Appendix I for correspondence documentation with neighbors. See Appendix A to see where vegetative screening and agricultural style fencing are proposed based on neighbor requests.

On March 26, 2025, GCE had a meeting with the CTDEEP Concierge team, including Robin Blum, Chris Stone, Linda Brunza, Jordan DiDomenico, Laschone Garrison, and Jessica Bilyard. GCE addressed questions about stormwater controls, fencing, and visual and noise impacts.

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 27, 2024 was provided by CT DEEP Wildlife Division. It

states that no extant populations of Federal or State Endangered, Threatened or Special Concern species are known to occur within the Project Area. The Final Determination letter approves construction as proposed. A copy of this letter is included in Appendix H.

6.0 Environmental Considerations

6.1 Site/Community Setting & Scenic Character & Values

The Project consists of 25.9 acres on a larger site of approximately 92.5 acres and is located on Gager Hill Road. The Property has been actively used for agriculture—alternating between corn and soybeans—since the current landowner acquired it. GCE proposes a dual-use solar approach, through farming commercially saleable perennial plants, such as herbs, within the Generation Footprint. The proposed Project would serve a dual purpose of contributing to the States commitment to Renewable Energy as well as preserving the agricultural history of the land. See Appendix M for the Department of Agriculture Materials, including the Agrivoltaics Farm Plan.

This Project site is also included in and surrounded by the Residential Agricultural zone of Scotland, which is characterized by “residential uses consistent with the furtherance of agricultural and rural businesses while maintaining the Town’s rural character and protecting the Town’s natural resources”. By implementing a dual-use solar project, the Project avoids the type of dense development that would be inconsistent with the rural setting. The Project supports ongoing agricultural activity while protecting the area’s natural resources, which aligns with the values of this zoning designation.

The site is not located near any publicly used spaces, such as schools, parks, trails, or ballfields. The existing tree line will provide a large level of screening for homes around the Project parcel. GCE is also working with neighbors and the Town of Scotland to minimize potential impacts, such as customizing screening solutions and utilizing agricultural-style fencing for a more aesthetic appearance. See the Fencing Detail on Sheet C-114 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 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.

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 Scotland 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.

The selected inverter has an acoustic noise rating 73 dBA at 1 meter distance and 67 dBA at 3 meters distance as noted in the inverter specification sheet provided in Appendix B. There are two equipment pads, Equipment Pad 1 is approximately 47 meters (154 feet) to the nearest property line and Equipment Pad 2 is approximately 45 meters (148 feet) to the nearest property line. Based on noise modeling completed for the Project, noise levels at the two nearest abutting property lines range from 26 dB(A) to 47 dB(A) at Receiver A and 25 dB(A) to 47 dB(A) at Receiver B. These sound levels are below the daytime criteria of 61 dB(A) and the nighttime criteria of 51 dB(A) with a 5 dB(A) penalty applied for the potential of 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 51 dB(A) sound requirement at nighttime. A copy of the report is included in Appendix L.

The nearest abutting property line to a noise generating equipment pad is located approximately 148 feet from the closest equipment pad. Since sound dissipates with distance, Petitioner does not anticipate that any Project-generated noise would be detectable by potential residential receptors and will be below regulated limits.

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

The Project Area is currently visible from some surrounding properties and Gager Hill Road. A visibility assessment was conducted to identify areas where the proposed PV panels would be visible, and to illustrate the potential visual change resulting from the installation of the Project through the development of photo simulations. The digital surface model viewshed analysis was conducted which considered the height and location of all surface features. The results indicated that potential PV panel visibility would mostly occur within the Project Area due to dense forest vegetation. Visibility is limited to small areas of open land to the northeast and south, and parts of Gager Hill Road and Huntington Road. Overall, less than 0.7% of the 2-mile radius study area will have potential visibility of the panels. Refer to Appendix J Visual Impact Assessment, Figure

1. Photo simulations from three representative viewpoints were developed to illustrate PV panel visibility. Refer Attachment B of Appendix J for the photo simulations. We have reached out to 14 abutting property owners, as well as the municipality of Scotland, to address any visual concerns they may have. We are working to customize screening solutions that will minimize the impact on those affected, including mitigation screening and a more aesthetic, agricultural-style fence. See Appendix A Sheets C104 through C107 to see where vegetative screening and agricultural style fencing are proposed based on neighbor and town requests.

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 June 11, 2025, is that no additional notice is required for FAA. See Appendix K - FAA Consultation.

6.7 Environmental Site Assessment/Conditions

A site investigation by a Licensed Environmental Professional from Verdantas investigated the Project Area for potential signs of contamination in September 2024. Verdantas performed a Phase I Environmental Site Assessment and prepared a report summarizing the findings. Verdantas 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

Verdantas completed a cursory review of the Natural Resources Conservation Service (“NRCS”) Web Soil Survey soil mapping of the site. Based on available data, the site is comprised of 10 soil map units (see Table 1).

Table 1 Project Site Soil Map Units

Soil Map Unit Name/Map Unit Symbol	Hydrologic Soil Group
Canton and Charlton fine sandy loams, 3 to 8 percent slopes (60B)	B
Hinckley loamy sand, 3 to 15 percent slopes (38C)	A
Ninigret fine sandy loam, 0 to 3 percent slopes (701A)	B/D
Ridgebury, Leicester, and Whitman soils, 0 to 8 percent slopes, extremely stony (3)	D
Ridgebury fine sandy loam, 0 to 3 percent slopes (2)	D
Rippowam fine sandy loam (103)	B/D
Sudbury sandy loam, 0 to 5 percent slopes (23A)	A/D
Sutton fine sandy loam, 0 to 8 percent slopes, very stony (51B)	B/D
Sutton fine sandy loam, 3 to 8 percent slopes (50B)	B/D
Sutton fine sandy loam, 0 to 3 percent slopes (50A)	B/D

In order to confirm in-field characteristics, on February 24, 2025, Verdantas personnel completed a test pit program in accordance with CTDEEP Stormwater Quality Manual. Test pits were located based on conceptual design layout. A total of ten (10) test pits were advanced to varying depths below ground surface (bgs) by means of a Bobcat E88 R-2 Series mini-excavator. Groundwater was encountered at between (5) five to (11) eleven feet bgs.

Infiltration testing was completed at TP-1, -2, -3, -4, -6, -7 & -8 for representative rates within the general vicinity of the conceptual proposed infiltration areas. Testing was completed using the Guelph permeameter method.

The CTDEEP Stormwater Manual, Table 10-2, Default (Rawls) Infiltration Rates for Use as Design Infiltration with Static Method Sizing, details infiltration rates for Loamy Sand (HSG A) as 2.41 inches per hour (in/hr) and Sandy Loam (HSG B) as 1.02 in/hr. The field-measured infiltration rates were greater, however, an infiltration rate of 1.02 in/hr was in the stormwater management design to be conservative with the exception of TP-1. In accordance with the CTDEEP Stormwater Manual Chapter 10, the infiltration rate used for the stormwater management design near TP-1 was 50% of the field measured infiltration rate or 4.44 in/hr (50% of 8.84 in/hr = 4.44 in/hr). See Appendix A for Test Pit locations and Appendix B for Field Infiltration Results within the Stormwater Management Report.

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 site will be placed on approximately 23.6 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 July 16, 2025. See Appendix M 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 stormwater basin requirements set by CTDEEP.

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.

As noted above, GCE submitted a proposal to the Department of Agriculture that received a letter of no impact from The Department of Agriculture on July 16, 2025.

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 in such a way that it will 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 M, for documentation related to the Department of Agriculture.

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 no/low sensitivity for archaeological resources and identified ten stone walls (SW-1 and SW-10) and one stone well within the Project Area, all of which are not located within proximity to the

development areas and will not be impacted by construction. The survey also identified approximately 18 acres of land within the Project Area that will be impacted by construction have a moderate/high sensitivity for archaeological resources. Based on the Phase 1A Survey, a Phase 1B study was recommended within approximately 18 acres of the Project Area. In November 2024, Petitioner retained Heritage Consultants to conduct a Phase 1B shovel test. During the Phase 1B Survey, 59 post-European Contact period artifacts, including ceramics, glass, metal, faunal specimens, and minerals were recovered. These artifacts, found in low densities and disturbed soils, were classified as unassociated field scatter and deemed not significant for the National Register of Historic Places. Additionally, three precontact era loci and one isolated find spot were identified. Artifacts from Locus 1, found in intact subsoil, suggest undisturbed precontact occupation, making it potentially significant. Locus 2, Locus 3, and ISO-1, found in disturbed plowzone deposits, were not considered significant. The results of the Phase 1B study concluded that avoidance during construction or further examination of Locus 1 is recommended before construction. A copy of the Phase 1A and Phase 1B report is included in Appendix F. In a letter dated January 17, 2025, the State Historic Preservation Office concurred that no historic properties will be affected by the proposed solar facility and no additional archaeological investigation is warranted.

6.10 Wetlands and Watercourses

6.10.1 Wetlands Delineation and Methodology

In September and November 2024, soil scientists from Verdantas investigated the site to determine if regulated Inland Wetlands or Watercourses were present. In Connecticut, Inland Wetlands are defined by areas of poorly drained or very poorly drained soils or alluvial soils of any drainage class. The investigation was facilitated using hand-drilled soil borings and hand dug test pits that were used to examine soil profiles and evaluate drainage classes. A Wetlands Delineation Report dated June 19, 2025, was prepared outlining the survey process and findings. This report concluded that wetlands and watercourses were identified and delineated on the Project site, including a perennial

watercourse, a Palustrine Scrub-Shrub wetland, and three Palustrine Emergent Wetlands. A copy of this report is included in Appendix G.

6.10.2 Existing Wetlands and Watercourses

The site features one perennial stream and four wetlands. Stream A is a forested, perennial watercourse that flows downslope towards a larger stream located south of the Project site. Due to limited accessibility, only the northernmost and southernmost portions of the perennial watercourse could be observed. The width of the stream ranged from approximately 4-8 feet, with the stream becoming wider in the southern portion of the Project site. At the time of the field reconnaissance, over 6 inches of flowing water were observed in the stream. Physical indications of the Ordinary High-Water Mark included a well-defined channel, scouring, and exposed roots.

Wetland B is located within the northern portion of the Project site, adjacent to the perennial watercourse, which flows south along the western border of the Project site. Soils within Wetland B contained redox features observed in the upper 12 inches and the observed soils did meet hydric criteria. Secondary indicators of saturation at or near the surface in these soils included rutting and poor growth of the agronomic crop planted. Vegetation within Wetland B was dominated by hydrophytic vegetation. Species observed within Wetland B included red maple (*Acer rubrum*), roundleaf greenbrier (*Smilax rotundifolia*), common jewelweed (*Impatiens capensis*). Uplands adjacent to Wetland B were dominated by vegetation typically observed in upland environments, including goldenrod species (*Solidago* spp.), black walnut (*Juglans nigra*), American pokeweed (*Phytolacca americana*), *Rubus* spp., Amur honeysuckle (*Lonicera maackii*), and Japanese honeysuckle (*Lonicera japonica*).

A significant portion of Wetlands D, E, and F areas and most of the wetland/upland boundaries were located in the agricultural fields. Wetland D is located in the western portion of the Project site and drains to the perennial watercourse. Wetland E is located in the eastern portion of the site and drains east towards an off-site watercourse. Wetland F is located along the western side of Stream A and drains south. Soils within Wetland D,

Wetland E, and Wetland F contained redox features that were observed in the upper 12 inches and the observed soils did meet hydric criteria. Secondary indicators of saturation at or near the surface in these soils included rutting, the presence of hydrophytes, and poor growth of the agronomic crop planted. Dominant vegetation (non-agricultural) observed within Wetlands D and E included common reed (*Phragmites australis*), broadleaf cattail (*Typha latifolia*), scarlet toothcup (*Ammannia coccinea*), common jewelweed, and smooth witchgrass (*Panicum dichotomiflorum*). Uplands adjacent to Wetlands D, E, and F contained the crop plant, common ragweed (*Ambrosia artemisiifolia*), smooth witchgrass, grape vines (*Vitis* spp.), black cherry (*Prunus serotina*), American pokeweed, eastern cottonwood (*Populus deltoides*), and goldenrods.

6.10.3 Vernal Pools

No habitat for vernal pools was discovered within the Project Area during the on-site field investigation in 2024 and Verdantas soil scientists have determined that no further in-season surveys are required as part of the development.

6.10.4 Proposed Project & Mitigation

The Project design includes several mitigation measures to protect Stream A and Wetlands B, D, E, and F. These measures include maintaining a 50-foot undisturbed wetland buffer and 100-foot wetland jurisdictional line to minimize disturbance, with the exception of one location in the northwestern portion of the site where road improvement activities would be located within both the 50-foot and 100-foot setbacks. See Appendix A, Sheet C103. No new wetland crossings will be created as a result of the Project. The existing dirt road within the wetlands will be replaced with a new gravel access road. The finished grades in that area will be less than 1 foot different than existing grades. Additionally, this area has already been cleared so there will be no need for tree removal associated with the road improvement activities. The existing culvert along the dirt road will be retained, with some potential maintenance in the form of removal of accumulated sediment or debris.

Erosion and sediment control measures, such as silt fences and silt socks, will be installed to prevent sediment from entering the wetlands and stream. Additionally, the Project will

implement a limit of disturbance to ensure construction activities do not encroach on protected areas. Vegetative buffers will be preserved and protect the integrity of the wetlands and stream during and after construction. These measures are designed to ensure that the natural habitats are preserved and that the environmental impact of the Project is minimized. 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 with one exception as noted above.

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 CTDEEP Wildlife Division for review. In return, a Final Determination dated August 27, 2024, was provided by CTDEEP Wildlife Division. It states that no extant populations of Federal or State Endangered, Threatened or Special Concern species are known to occur within 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

A review of the CTDEEP 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 CTDEEP's Forestry Division. A copy of this letter is included in Appendix N.

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

6.13.1 Existing Conditions

The existing Property is currently used for the farming of feed corn with open field connected by a dirt access road and surrounded by wooded areas. Four wetlands were delineated onsite, along with a perennial stream. An approximately 16-foot-wide dirt access road connects the inner cultivation areas to Gager Hill Road and intersects the wetland areas. The existing dirt road will be removed and replaced with a gravel access road. Surrounding land use is largely residential or used for agricultural purposes.

Under existing conditions, untreated stormwater runoff from within the Property limits generally flows from northwest to southeast overland. One area of potential archaeological significance was identified onsite and the Project was designed to minimize the disturbance in this area.

Topography on the site consists of flat areas (less than 1% slope) near Gager Hill Road to gentle slopes (4-9% slopes) near and within the wooded area at the northwest portion of the site. Information and computations regarding existing conditions hydrology are contained in the Stormwater Management Report. A copy is included in Appendix E.

6.13.2 Proposed Conditions

Petitioner prepared a Stormwater Management Report in accordance with the CTDEEP Stormwater Quality Manual (“Manual”), publication date September 30, 2023, effective March 30, 2024, and the corresponding Appendix I of the Manual for Stormwater Management at Solar Array Construction Projects. A copy of the report is included herein as Appendix E.

In accordance with the Manual, Petitioner reviewed the NRCS soil mapping to determine potential soil conditions based on available documentation. In conjunction with the cursory review NRCS mapping, Petitioner also performed a subsurface field geotechnical study in February of 2025 to investigate the native soil conditions and infiltration rates at the proposed locations of the infiltration basins. As indicated in the attached Stormwater Management Report, pre-development drainage patterns have been maintained to the greatest extent feasible in an effort to maintain pre-development flows to off-site areas.

The proposed solar array development includes the installation of approximately 8,774 panels erected by means of driven piles with a subsequent gravel access drive and two concrete equipment pads. The proposed development of the Project Area includes limited clearing as to accommodate the installation of the solar array, while maintaining existing topography to promote no change to stormwater runoff or flow direction. The proposed stormwater management of post-development conditions implements Low Impact Design Site Planning and Design by utilizing simple disconnection of impervious surfaces. In accordance with Appendix I of the Manual, the proposed impervious surfaces are naturally conveyed to a stone infiltration trench alongside a portion of the gravel driveway, grassed infiltration basins, and grassed swales. The infiltration basins include a sediment forebay and are sized to accommodate the Water Quality Volume for a 1.3-inch rain event. Hydrologic calculations for existing and proposed conditions were performed using HydroCAD software, which uses TR-55 methodology to calculate runoff and TR-20 methodology for stormwater routing through the stormwater conveyance facilities. Site hydrology was evaluated for the 2-, 10-, 25-, and 100-year 24-hour storms.

The hydrologic design calculations were completed using the Rational Method to calculate the design flows to each stormwater inlet structure. The stormwater conveyance system was designed using Manning's Equation. Additionally, the stormwater conveyance system was designed to handle the runoff generated by a 100-year design as the stormwater peak rate of runoff or volume in the post-development condition.

The site was analyzed for nine (9) independent existing conditions watershed delineation areas (ES1, ES2, ES3A, ES3B, ES4, ES5A, ES5B, ES5C, and ES5D), and for 21 proposed watershed delineation areas (PS1A, PS1B, PS1C, PS2, PS3A, PS3B, PS3C, PS3D, PS3E,

PS4A, PS4B, PS5A, PS5B, PS5C, PS5D, PS5E, PS5F, PS5G, PS5H, PS5I, and PS5J) with associated flow direction and design point, respectively.

As further detailed by the CTDEEP Stormwater Manual for Solar Array Runoff, Verdantas also proposed a series of level spreaders spaced a maximum 150-feet with no greater than a 1-foot per second inflow velocity to ensure long term sheet flow conditions. In addition, upon completion of the solar array, in the areas that will not be farmed, an Ernst grass and forb seed mix shall be planted to further assist in the management of overland runoff.

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 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, and 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.