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August 1, 2024

Via Hand Delivery

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Willington Solar One, LLC and VCP, LLC d/b/a Verogy, LLC – Petition for a Declaratory Ruling that a Certificate of Environmental Compatibility and Public Need is not Required for the Construction, Operation and Maintenance for a Proposed Solar Voltaic Power Generating Facility at 41-43 Lohse Road, Willington, Connecticut**

Dear Attorney Bachman:

Enclosed is an original and fifteen (15) copies of the above-referenced Petition for Declaratory Ruling for the Willington Solar One, LLC and VCP, LLC d/b/a Verogy solar facility at 41-43 Lohse Road in Willington, Connecticut. Also enclosed is a check for the $625.00 filing fee. An electronic copy of the Petition will be provided by VHB, the project engineers.

Thank you in advance for your assistance and cooperation.

Sincerely,

Kenneth C. Baldwin

Enclosure

29280705-v1

Petition of Willington Solar One, LLC for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is Required for the Proposed Construction, Operation and Maintenance of a 1.975 MW AC Ground-mounted Solar Photovoltaic Electric Facility Located at Lohse Road in Willington, Connecticut

Prepared for
The Connecticut Siting Council

August 1, 2025

VEROGY

vhb

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1.0 Introduction

Pursuant to Connecticut General Statutes §§4-176(a) and 16-50k(a), and Section 16-50j-38 of the Regulations of Connecticut State Agencies ("RCSA"), Willington Solar One, LLC ("Willington Solar One" or "Petitioner") hereby petitions the Connecticut Siting Council ("Council") for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required for the construction, operation and maintenance of a solar photovoltaic electric generating facility in the Town of Willington ("Town"), Connecticut (the "Project"). The Project consists of the development of a 1.975-megawatt ("MW") alternating current ("AC") ground-mounted solar photovoltaic ("PV") system located on an approximately 18.4-acre parcel at 41-43 Lohse Road, Willington, Connecticut ("Property"). See Figure 1 – Site Location Map and Figure 2 – Proposed Project Areas Aerial.

The Project was selected and awarded a twenty (20)-year contract to participate in Connecticut's Non-Residential Renewable Energy Solutions Project ("NRES") program. The Project's output will be used to help Connecticut meet its emissions reduction targets via the State of Connecticut's Renewable Portfolio standards and Governor Lamont's aggressive Greenhouse gas ("GHG") reduction goals. Energy produced by the Project will be sold to The Connecticut Light and Power Company d.b.a. Eversource Energy ("Eversource") at market rates specified in the applicable utility tariff with Eversource for any self-generation facility.

Approval of this Petition by the Council would allow the Petitioner to construct the Project and assist the State of Connecticut in achieving its goal of energy conservation and sustainability. After Council approval is received, the Project will commence its financing, prepare detailed engineering plans, and commence construction in 2026, with commercial operation planned for the Project by the end of 2027.

The Project will be constructed on a 10-acre portion of the Property (the "Project Site"). The Property is located in the Town's Residential R-80 zoning district. See Figure 2-Property Card. See Figure 3 – Site Survey.

2.0 Petitioner

Willington Solar One is a Connecticut limited liability company with its principal place of business at 124 LaSalle Road in West Hartford, Connecticut. Willington Solar One is an subsidiary of Verogy Holdings, LLC ("Verogy"). Verogy is a professional renewable energy business with decades of experience in the solar industry; the core of its business is developing, financing, constructing, managing, and operating solar projects. The management team at Verogy has constructed over 250 megawatts of solar projects across the United States.

Mailing Address:	Willington Solar One, LLC 124 LaSalle Road, 2nd Floor West Hartford, CT 06107
Internet Address(es):	https://www.verogy.com/ https://www.verogy.com/willington-solar-one/

Correspondence and other communications concerning the Project are to be addressed to, and notices, orders and other papers may be served upon, the following:

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The Petitioner consents to electronic mailings of all Council and Petition-related correspondence.

3.0 Proposed Project

3.1 Project Site Overview

The Property is an 18.4-acre parcel located at Lohse Road, Willington, Connecticut in the northern portion of Willington. The Town's Assessor's records identifies the Property as MBL – 046-004-00.

The Project Site is in the westerly portion of the Property, west of Lohse Road, east of Wilderness Way, and north of Kucko Road.

3.1.1 Existing Site Land Use

The Property maintains an existing tree farm but is otherwise wooded. According to Willington's Zoning Map, the principal use of the parcel is designated residential and located in a residential zoning district.

3.1.2 Surrounding Land Use

The area surrounding the Project consists primarily of low-density single-family residences and woodlands. Interstate 84 is located approximately 1,000 feet to the south.

3.1.3 Project Site Alternatives

The Project Site was selected by Willington Solar One because it was suitable for a solar PV project and would have minimal natural resource and environmental impacts. The Project as designed will not have adverse effects on wetlands or agricultural land, and will not diminish the quality of life of those who live in the vicinity. It is also important to Willington Solar One to select a site that allows interconnection of the Project to a an existing Eversource feeder line and substation.

3.2 Project Description

3.2.1 Project Site Access

Access point to the Project Site will extend from Loshe Road utilizing an existing gravel access road currently used to access the tree farm portion of the Property. The Petitioner will improve certain sections of the existing access road to accommodate access to the proposed solar array, electrical equipment, and stormwater detention basins. The Petitioner proposes the improvements of the roadway on prepared subgrades with a gravel topping which would match existing grades to the greatest extent feasible. See Figure 4 – Proposed Project Layout and Appendix A – Sheet 2.0 Layout and Materials Plan.

3.2.2 Solar Facility Design and Layout

It is currently anticipated that the Project will consist of photovoltaic (PV) arrays to be comprised of 465 and 590-watt panels (depending on the state of module technology available at the time of construction) arranged two-high in portrait set at a 25-degree angle to maximize annual energy production within the available buildable area on the Property. The panels will be mounted on steel racking with driven posts or ground screws, 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 has a nameplate capacity of 1.975 MW AC and is designed with 59 strings of 24 590 W modules, for a total of 1,416 modules, and 542 strings of 6 465 W modules, for a total of 3,252 modules. There would be 15-125 KW inverters and 1-100 KW inverter that are to be distributed throughout the array and mounted to or placed adjacent to the racking structure. The DC capacity of the Project is 2.348 MW and the AC capacity is 1.975 MW. The DC to AC ratio is 1.189. The Power from the inverters would be directed to a transformer, switchgear, meter, and disconnects prior to interconnecting with utility distribution feeder. See Appendix B for Project specifications and the Analytical Report summarizing the Toxicity Characteristic Leaching Procedures ("TCLP") for the solar panel that the Petitioner intends to install as part of the Project.

3.2.3 Electrical Interconnection

The interconnection application for the proposed Project was submitted to Eversource on July 18, 2024. Eversource is currently in the process of completing a Distribution System Impact Study for the Project, as well as a Cluster Transmission Study in tandem with ISO-New England. These are expected to be completed by December 2025.

3.2.4 Fencing and Site Security

Petitioner proposes to install a 7-foot high chain link fence around the perimeter of the Project Site to provide site security, as well as to address National Electric Code requirements. In addition, the entrance to the Facility will be gated limiting access to authorized personnel only.— All Town emergency response personnel will be provided access to the Facility via a Knox Pad lock. Importantly, the Petitioner notes that the Project will be monitored from off-site and will have the ability to remotely de-energize in the event of an emergency. See Appendix A – Sheet 2.0 - Layout and Materials Plan.

3.3 Stormwater Management

The Petitioner prepared a Stormwater Management Report in accordance with the 2024 State of Connecticut Stormwater Quality Manual and with the Connecticut General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ("Stormwater General Permit") effective November 2022. A copy of this Report is attached as Appendix E.

The Petitioner also reviewed online soil mapping and intends to perform a field geotechnical study to investigate the native soil conditions and infiltration rates at the proposed locations of the stormwater basins. A copy of the findings of this study will be provided to the Council when it is available. As indicated in the attached Stormwater Management Report, predevelopment drainage patterns have been maintained to the greatest extent feasible in an effort to maintain pre-development flows to off-site areas.

Four permanent stormwater basins with supporting swales have been designed and are strategically located within the Project Site to maintain existing drainage patterns and to

maintain water quality especially from those areas that will be cleared of trees. The basins will discharge stormwater towards where the existing runoff flows. The proposed basins do not exceed the 3 acre-feet volume limit; thus a CT DEEP Dam Safety permit is not required.

Petitioner developed a HydroCAD model, using TR-55 methodology, to evaluate the existing and proposed drainage conditions on the Property. The results of the analysis demonstrate that there would not be an increase in peak stormwater runoff rates for the 2-, 25-, 50-, and 100-year storm events to any sub watershed. Water quality treatment of the Project Site will be handled in the permanent stormwater management basins as well as within the vegetated buffer areas between the Project and adjacent wetlands.

3.4 Construction Schedule and Phasing of Construction

The Petitioner anticipates that construction of the Project will begin in the Fall of 2026 and will take approximately (9) months. Construction activities within the Project Site will include: tree clearing, grading to incorporate the Project's proposed stormwater management features, erosion and sedimentation ("E&S") control measures, and racking and module(s) electrical trenching; the installation of interconnection infrastructure; and, an improved access road(s) development. Existing grades throughout the Project Site will remain, except in areas where the Project's stormwater management features are proposed. For these areas, some regrading (i.e., cuts/fills) will be required.

Initial work would involve the installation of erosion and sediment control measures, including installation of sediment traps. A temporary staging area would be located in the eastern portion of the Project Site.

Upon completion of the installation of the erosion control measures, the Petitioner will commence the required clearing and begin the racking installation. Upon completion of the racking installation the modules and other electrical equipment will be installed. Final site stabilization, testing, and commissioning would be expected to be completed in the Summer of 2027. Construction activities would be expected to occur 7:00AM to

6:00PM Monday through Friday and Saturday between the hours of 8:00 a.m. and 5:00 p.m.

A Storm Water Pollution Control Plan (SWPCP) would also be developed and implemented by the project civil engineer that will include regular inspection of erosion control measures to prevent sedimentation or water quality impact. The Petitioner will also register for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities from CT DEEP. The Stormwater Management Report (Appendix E) provides Erosion and Sedimentation Control Best Management Practices – Maintenance/Evaluation Checklists for Construction Practices and Long-Term Practices. Construction sequencing is described in detail on sheet C-4.0 in Appendix A.

3.5 Operation and Maintenance

Required maintenance of the Project will be minimal; the Petitioner anticipates that the Project Site will require mowing and routine maintenance of the electrical equipment annually which will typically involve two (2) technicians. The Facility would be monitored remotely 24 hours a day, 7 days a week. The Petitioner does not expect that any snow removal operations will be necessary for the Project, given that the selective positioning of the solar panels allows for any accumulating snow to "sheet" off. Repairs to the facility components will be made on an as-needed basis. See Appendix C – Operation & Maintenance Documentation.

3.6 Decommissioning

At the end of its useful life, the Project will be decommissioned in accordance with the requirements of the Petitioner's land lease agreement and the Project's Decommissioning and Restoration Plan. See Appendix D – Decommissioning and Restoration Plan.

4.0 Project Benefits and Needs

The State of Connecticut has committed to develop its renewable energy market and mitigate the negative environmental impacts associated with traditional electric power generation. In so doing, it has set aggressive targets to reduce greenhouse gas ("GHG") emissions and to increase the deployment of Class I renewable energy.

The Governor's Council on Climate Change ("GC3") recommendation is that the Connecticut's Renewable Portfolio Standard ("RPS") reach a target of 40 percent Class I renewable energy sources by 2030, with an aim to reduce the carbon intensity of the RPS to achieve the State's decarbonization goals. Additionally, Governor Lamont has set a 100 percent zero carbon target for the energy sector by 2040. Owners of renewable-electricity generation projects receive one renewable energy certificate (REC) for every megawatt-hour of renewable electricity they produce. Those RECs are traded in a regional market for state RPS compliance. Connecticut establishes required annual REC percentages from three classes of renewable energy resources.

If approved, the Project will provide a wide range of environmental and economic benefits to the State of Connecticut and the Town, including:

- Once operational, the Project will generate approximately 3,035 MWh per year. This is enough renewable energy to power 800 homes for an entire year and would effectively offset 2,039 metric tons of carbon dioxide annually—the same amount as 33,718 tree seedlings grown for ten (10) years, or the emissions from 229,459 gallons of gasoline consumed.
- Reduction in energy demand during peak usage will decrease energy costs for ratepayers Statewide.
- The creation of construction jobs in the region.
- The Project will effectively increase new annual municipal tax revenues for Willington with no additional burden on town services.
- The Project will provide infrastructure upgrades that will improve the reliability of the electrical grid in the Town; and
- The Project will only occupy an estimated 10 acres out of a total 18.4 acres—

thereby leaving almost 50% of the Property undeveloped and available for other uses, including agriculture and open space.

5.0 State and Local Outreach/Input

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

On July 1, 2025, Willington Solar One project team, including VHB, met with the CT DEEP's Concierge team. The DEEP staff present at that meeting represented Dam Safety, Environmental Review and Strategic Initiatives, and Stormwater Divisions. CT DEEP staff provided feedback that the Project seemed straight forward and did not have any specific comments after VHB's presentation.

On June 18th, 2025, Willington Solar One sent a Project Fact Sheet and other related information about the Project to the abutting property owners and established a Project-specific website (www.verogy.com/Willington-solar-one) to keep the public informed about the Project. See Appendix I – Public Outreach Documentation for copies of Willington Solar One's Project Fact Sheet and a sample letter sent to abutting landowners as well as a list of the abutting landowners notified.

In addition, pursuant to the requirements of R.C.S.A. § 16-50j-40(a), Willington Solar One has sent out formal notice concerning this Petition to all abutters and applicable governmental officials. In addition to the information referenced above, Appendix I also contains: 1) a sample abutters' notice letter, a list of abutting property owners and a Certificate of Mailing verifying that the abutters' notices were mailed on July 24, 2025; and 2) a sample government officials notice letter, a list of government officials receiving notice and a Certificate of Mailing verifying that the government officials' notices were mailed on July 24, 2025.

6.0 Potential Environmental Effects/Impacts

6.1 Site/Community Setting and Scenic Character and Values

The Project is located in the westerly portion of the Property and will occupy approximately 10 acres of the 18.4 acres. The overall land use of the parcel/property consists of a tree farm, forested areas, wetlands. The surrounding land use is primarily low-density residential.

6.2 Public Health and Safety

The Project is not expected to create any adverse impact with regard to public health or safety issues. The 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 will be 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 be a designated construction manager and/or site safety officer or representative present at all times during construction, and such individual will be responsible for overseeing/implementing the site construction health and safety plan.

Construction vehicles accessing the Property will include standard construction pickup trucks, small earth moving equipment, and all-terrain forklift equipment. Vehicle trips would vary based on 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.

Some hazardous substances are required to be used or stored on the Property during construction or operation of the Project. Diesel fuel for construction equipment will be in regular use during construction activities, requiring some on-Property fuel storage. Further, the inverter step-up transformers located at each equipment pad will use biodegradable oil for cooling. Accordingly, a Spill Prevention, Control, and

Countermeasure ("SPCC") Plan (Appendix L) and an Operations and Maintenance ("O&M") Plan (Appendix C) have been developed for the Project.

6.3 Noise

6.3.1 Noise Level Guidelines and Regulatory Requirements

Potential Project-related noise is regulated by Connecticut General Statutes section 22a-69. The Town of Willington is not known to have its own separate noise ordinance.

General Statutes section 22a-69 is applicable to the proposed Project and requires the Project to meet the following sound levels: 61 dBA at the nearest residential property during the day (when the Project would be generating electricity); 51 dBA at the nearest residential property at night (when 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 majority of uses surrounding the Project are residential, and a 5 dBA penalty for tonal noise would be applicable to this Project, so it is anticipated that acceptable noise levels would be 56 dBA daytime and 46 dBA nighttime.

6.3.2 Proposed Project-generated Noise

Due to the nature of the use, facility design, required equipment and distance from potential noise receptors, the proposed Project is expected to have no adverse noise-related impact on the surrounding area. Existing uses around the perimeter of the Project site include single-family residential development.

The selected inverter has acoustic noise rating 65 dBA at 1 meter distance, as noted on the inverter specification sheet provided in Appendix B. All other selected system equipment will typically generate the same or lower levels of noise.

The nearest residential parcel is located at 8 Kucko Road approximately 265 feet to the south of the closest proposed inverter. It is anticipated that Project generated sound

levels at this nearest adjacent parcel line would be approximately 32 dBA during full site operation, and that sound levels to the existing residence at 8 Kucko Road as well as any other adjacent residential parcel lines, would be lower.

6.4 Air Quality

Because the Project is a solar energy generating facility, no air emissions will be generated during operations and, therefore, an air permit would not be required. Temporary, potential construction-related mobile source emissions would include those associated with construction vehicles and equipment. Any potential air quality impacts related to construction activities can be considered *de minimis*. Such emissions would be mitigated using available measures including limiting idling times of equipment; proper maintenance of all vehicles and equipment and watering/spraying to minimize dust and particulate releases. In addition, all on-site and off-road equipment would meet the latest standards for diesel emissions, as prescribed by the United States Environmental Protection Agency (USEPA) and, with the above mitigation measures, should reduce the exhaust emissions.

6.5 Visual Impact Assessment

Petitioner anticipates that the location of the proposed Project, coupled with the design of the proposed solar energy facility, would significantly limit, if not eliminate, any potential views from off the Property. The Project has been sited on land which is generally low visibility from surrounding roads, residences, and any designated public recreation area (i.e. playing fields, walking trails, or parks). Views into the Project Area from surrounding area are naturally mitigated due to a variety of distance, topography, and existing vegetation. Cross sections displaying the proposed Project elements in relation to two (2) different abutting parcels have been prepared in support of this Petition and are included in Appendix J.

6.6 Federal Aviation Administration Determination

Petitioner used the Federal Aviation Administration ("FAA") Notice Criteria Tool to screen the Project Site to assess if the Project triggers the FAA Notice Criteria. The result of the initial screening on December 17, 2024 is that no additional notice is required for FAA. See Appendix K, FAA Consultation.

6.7 Site Soils and Geology

6.7.1 Existing Site Soils and Geology

A review of available NRCS online soils mapping indicated the presence of multiple soils throughout the project area, with mostly Hydrologic Soil Groups of "B" and slopes ranging from 3 to 20%. Petitioner intends to perform geotechnical subsurface testing at the Site and the results will be provided to the Council for reference. Soils information is included in Figure 8 – NRCS Soils Information.

6.7.2 Preservation of Prime Agricultural Soils

The Property is currently undeveloped farmland and woodlands. A review of the USDA's soil mapping for the area indicates that no prime farmland exists on the Property . The Petitioner does not anticipate the need to export any soils from the Project Site or Property. Any excess material will be reused on site.

6.8 Historic and Archaeological Resources

Heritage Consultants prepared a 1A Cultural Resources Assessment Survey in March 2025. Heritage found that portions of the Project Site contained a moderate sensitivity for archaeological resources and recommended that a Phase 1B study be performed within these areas. Petitioner retained Heritage Consultants to perform a Phase 1B study in these areas and the investigation concluded that no impacts to cultural resources are expected by the proposed construction of the Project, and no addition archaeological examination is recommended. A copy of the Phase 1A & 1B reports are included in Appendix F, and the SHPO concurrence letter will be distributed to the Council upon receipt.

6.9 Wetlands and Watercourses

6.9.1 Wetlands Delineation and Methodology

A Davison Environmental registered soil scientist visited the site on December 2 and 3, 2024 to delineate Connecticut jurisdictional wetlands and watercourses. The delineation was conducted in accordance with the requirements of the Connecticut Inland Wetlands and Watercourses Act (P.A. 155). Inland wetlands include soil types designated as poorly drained, very poorly drained, alluvial, and floodplain by the National Cooperative Soils Survey as may be amended from time to time, of the National Resources Conservation Service (NRCS). Watercourses means rivers, streams, brooks, waterways, lakes, ponds, marshes, swamps, bogs and all other bodies of water, natural or artificial, vernal or intermittent. Intermittent watercourses shall be delineated by a defined permanent channel and bank and the occurrence of two or more of the following characteristics: *(A) Evidence of scour or deposits of recent alluvium or detritus, (B) the presence of standing or flowing water for a duration longer than a particular storm incident, and (C) the presence of hydrophytic vegetation.*

Soils were examined per the aforementioned regulatory requirements. Along each wetland boundary, a hand auger was used to investigate the soil profiles to a minimum depth of 20 inches. This was necessary to determine the U.S. Department of Agriculture drainage class (per State requirements). Soil profiles were reviewed approximately every 15-30 feet along the boundary, typically digging one hole on either side of the defining boundary to confirm the wetland limit.

Wetlands were delineated with pink plastic flagging tape labeled “Wetland Delineation” and numbered WF-1 to 28 and WF-1X to 58X, as depicted on the Project Site Plans.
A Wetlands Delineation Report dated December 6, 2024, was prepared outlining the survey process and findings. A copy of this report is included in Appendix G.

6.9.2 Existing Wetlands and Watercourses

There is a single contiguous hillside groundwater slope forested wetland that encompasses the east-northeast portions of the site. It is widest at the northcentral site boundary and narrows as it drains to the southeast. There is a small upland peninsula on the northeast potion of the wetland. The wetland system contains a series of embedded braided watercourses that drain to a culvert under the existing access roadway. The culvert outlets into a small ponded area that drains offsite to the southeast. The wetland has a saturated to temporarily flooded hydrology[1]. Wetland soil consists of the Ridgebury, Leicester and Whitman complex. This is an undifferentiated mapping unit consisting of two poorly drained (Ridgebury and Leicester) and one very poorly drained (Whitman) soil developed on glacial till in depressions and drainageways in uplands and valleys. Their use interpretations are very similar, and they typically are so intermingled on the landscape that separation is not practical. The Ridgebury and Leicester series have a seasonal high water table at or near the surface (0-6") from fall through spring. They differ in that the Leicester soil has a more friable compact layer or hardpan, while the Ridgebury soils have a dense to very dense compact layer. The Whitman soil has a high water table for much of the year and may frequently be ponded. A more comprehensive analysis of the various wetland systems can be found in the Wetland Delineation Report included in Appendix G.

6.9.3 Vernal Pools

A vernal pool assessment was conducted on June 18, 2025. Site wetlands were traversed and surveyed visually and with a dipnet. No vernal pool indicator amphibians were observed. While it is late in the season to conduct such a survey, the two common indicator species, the wood frog (*Rana sylvatica*) and spotted salamander (*Ambystoma maculatum*) are likely to still be present in larval stage, particularly spotted salamander which typically do not metamorphose until approximately July. Overall, the wetland lacks suitable vernal pool hydrology. It is a hillside groundwater slope wetland with gently

[1] Saturated Hydrology: substrate is saturated for extended periods during the growing season, but standing water is rarely present.
Temporarily Flooded Hydrology: flooded for brief periods during the growing season, but water table is otherwise well below surface.

sloping topography throughout and standing water restricted to shallow seeps and intermittent watercourses. Only one area of suitable vernal pool hydrology was found just downstream of the farm road crossing. This location is a flow through stream but does contain a small backwater pool. Due to the flashy hydrology of this area, it is suboptimal quality and no amphibians were observed.

6.9.4 Upland Habitats

Two upland habitats are present on the Site, mixed hardwood forest and late old field. Mixed hardwood forest consists of typical second growth forest on glacial till surficial geology. The dominant tree species include red oak (*Quercus rubra*), black oak (*Quercus velutina*), black birch (*Betula lenta*), scattered white pine (*Pinus strobus*), hickory (*Carya sp.*) and musclewood (*Carpinus caroliniana*), a shrub layer dominated by witch hazel (*Hamamelis virginiana*), mountain laurel (*Kalmia latifolia*), mapleleaf viburnum (*Viburnum acerifolium*) and scattered invasive Japanese barberry (*Berberis thunbergii*), and a groundcover that includes hay-scented fern (*Sitobolium punctilobulum*), and cinnamon fern (*Osmunda cinnamomea*). The majority of the forest is large poletimber with scattered sawtimber. There is a small sapling stand dominated by black birch.

Late old field habitat occurs within the fields that were previously utilized for the tree farm. They are abandoned fields that are infrequently maintained and are dominated by annual grasses with scattered trees and shrubs. Grasses consist predominantly of Eurasian cool season grasses including orchard grass (*Dactylis glomerata*), timothy (*Phleum pratense*) and quackgrass (*Elymus repens*). Other common herbaceous species include goldenrods (*Solidago sp.*), milkweeds (*Asclepias sp.*), Queen Anne's lace (*Daucus carota*), clover (*Trifolium sp.*), with dense vines along the fields perimeter including grapevine (*Vitis sp.*) and Asiatic bittersweet (*Celastrus orbiculatus*). Scattered trees and shrubs include remaining spruces from the former nursery operation, along with autumn olive (*Elaeagnus umbellata*), black cherry (*Prunus serotina*), sumac (*Rhus sp,*), and multiflora rose (*Rosa multiflora*).

6.9.5 Proposed Project and Mitigation

The Project has been designed to provide a vegetated buffer between the Project Site and the on site wetland systems, thereby maintaining an ecological edge zone that separates the solar panels and stormwater features from these on-Property wetland communities. The wetlands will be further protected by incorporation of the stormwater management features that have been designed to mitigate peak runoff rates and treat water quality that is generated from the development area.

In concurrence with CTDEEP Stormwater General Permit, the minimum buffer proposed for any grading activities or infrastructure development is generally 50-feet from any wetland resource, and the minimum buffer proposed for any solar panels is generally 100-feet from any wetland resource.

6.10 Wildlife and Habitat

6.10.1 Rare, Threatened and Endangered Plants and Wildlife

Based upon a review of NDDB documentation, there are no known Rare, Threatened, and Endangered (RTE) species at the Property. An overlay of the Project Site on NDDB mapping can be found within Appendix H.

6.10.2 Potential Impacts and Mitigation

The standard level of care for wildlife species will be employed during construction of the project and any RTE species discovered will be notified to CTDEEP Wildlife Division.

6.10.3 Core Forest

Review of CTDEEP Forestland Habitat Impact Map indicates that portions of the site contain Forestland Habitat Impact Area but it is fragmented on the site. This mapping can be found in Figure 10.

6.11 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.

6.12 Stormwater Management

6.12.1 Existing Conditions

Under existing conditions, untreated stormwater runoff from most of the Site generally flows easterly overland towards existing wetlands and off the Property.. This wetland conveys stormwater off the southeastern property corner. Portions of the development area convey stormwater runoff to the south across Property boundary.

Approximately 50% of the Project Site is comprised of forestland, with the remaining 50% are generally comprised of grass/orchards. Generally, the site is at its highest elevation within the northwestern portion of the Project Site, and slopes to the east towards the adjacent forested wetland systems. The majority of terrain slopes in the Project area range from 3% to 15% with portions ranging up to 20% slope.

Information and computations regarding existing conditions hydrology is contained in the Stormwater Report. A copy is included in Appendix E.

6.12.2 Proposed Conditions

The proposed stormwater management system for the Project has been designed to meet State standards found within 2024 Connecticut Stormwater Quality Manual and CTDEEP Stormwater General Permit effective November, 2022. The system consists of four proposed permanent stormwater management basins and accompanying drainage swales which have been strategically located throughout the Project site to maintain existing drainage patterns to the onsite wetlands. A seed mix of permanent turf forming grasses will be used to establish vegetation directly under the modules to help stabilize the topsoil from erosion, sequester nutrients and pollutants, and lower runoff rates. The only

impervious surfaces created by the Project will be a small amount of gravel access road and equipment pads.

Post-construction stormwater runoff will be collected and conveyed to the stormwater basins via overland sheet flow and permanent diversion swales. The ponds will include an outlet control structure designed to mitigate peak stormwater flows to predevelopment levels. Water quality treatment is provided in the basins and infiltration of stormwater runoff into the ground has been promoted to the maximum extents practicable. Information and computations regarding proposed conditions hydrology is contained in the Stormwater Report. A copy is included in Appendix E.

7.0 Conclusions

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

- The Project meets CT DEEP's air and water quality standards, with no material emissions associated with either construction or operation, and water quality standards associated with construction and operational stormwater management a primary focus of the Project's design;
- The Project has been configured to avoid any substantial environmental impacts by largely utilizing land which has been subject to former orchard/harvesting uses; and

In addition, the Project would not be visible from any public viewsheds and would be largely screened from surrounding properties; nor will there be any impacts from noise.

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