



0 200 400 800 Feet

- Utility Pole
- Property Boundary
- Solar Panels
- Existing Stockade Fence
- Proposed Fence
- Existing Access Road

- Proposed Access Road
- Swale
- Overhead Electric
- Underground Electric
- Delineated Wetland Boundary
- 100-foot Wetland Buffer
- 50-foot Wetland Buffer
- Delineated Wetland Area
- Basin
- Equipment Pad
- Successional Shrub
- Manicured Lawn
- Cropland
- Fallow Cropland/Early Successional Grassland

- Parcel Boundary



To: Gabriel Rusk, Senior Project Developer
Greenskies Clean Energy
127 Washington Avenue
West Building, Garden Level
North Haven, CT 06473
Via email: gabe.rusk@greenskies.com

Date: December 30, 2025
Project #: 43507.00

Memorandum

In response to your request, VHB, Inc. (VHB) has prepared the following memo specific to the presence of grassland habitat on the proposed 4.9-megawatt (MW) ground-mounted solar array site at 54 South Street in Morris, Connecticut. In summary, though constrained seasonally, VHB investigated the proposed project area on December 18, 2025, for the presence of grassland habitat. One area of fallow cropland/successional grassland, approximately 2.88-acres, located between two cropland fields, in the southern portion of the project area was identified (Figure 1). This successional area was recently used for corn production but was rested in 2025. No areas of contiguous upland meadow comprised of native plants presently exist within the proposed project area.

Background

Portions of the 74-acre subject parcel are mapped as potential habitat for state-listed flora or fauna, per the Connecticut Department of Energy and Environmental Protection (CT DEEP) Natural Diversity Database (CT NDDB). As a result, VHB, at the direction of Greenskies Clean Energy (GCE), submitted a determination request to NDDB and received a final determination number on September 12, 2024. The final determination letter identified a number of species with the potential to occur within the vicinity of the project area, including ground nesting birds, such as the bobolink (*Dolichonyx oryzivorus*) and Savannah sparrow (*Passerculus sandwichensis*). The NDDB letter included a recommendation to avoid ground disturbance activities, e.g. digging, ground clearing, heavy machinery driving/staging or trampling, which may fragment large parcels of grassland habitat between April 15 and August 15 in a calendar year. Grasslands are unique ecosystems, generally managed by mowing or prescribed burns, typically found on sandy or gravelly soils dominated by bunch forming grasses, such as little bluestem (*Schizachyrium scoparium*), switch grass (*Panicum virgatum*) and poverty grass (*Danthonia spicata*) and interspersed by forbs like golden rod (*Solidago spp*) and asters (*Asteraceae spp*). The time of year restriction is intended to minimize the potential for conflict with ground nesting birds.

Site Description

The project area occupies 57-acres of the 74-acre parcel. Existing ecologies within the project area consist primarily of cropland used for corn and other agricultural production, small areas of manicured lawn, successional shrubland, as well as small areas of fallow cropland/early successional grassland habitat. Mixed class palustrine inland wetlands are interspersed between the upland habitat and occupy almost 20% of the project area. The wetland systems consist of areas of emergent wetland meadow habitats. Due to the dominance of cropland on the parcel and the need for the farmer to routinely modify cropland areas to maximize yields and soil health, the cropland areas vary in location and size across the project area from year to year. In evaluating the presence of grassland on the parcel in December 2025, VHB identified a 2.88-acre area in the southern portion of the project area that was previously cropland but presently a fallow cropland/early successional grassland area, containing a mix of native and non-native herbaceous species. No other upland meadow areas were identified within the project area.

Proposed Project and Species Protections

The proposed ground-mounted solar array and associated appurtenances will occupy 21-acres of the 57-acre project area. Much of this work will occur within cropland with small inclusions of successional shrub and former cropland/early successional grassland. However, dependent on the project timing and agricultural production requirements, the area currently mapped as former cropland may be used for production in a subsequent growing season. The existing site ecologies do not include preferred grassland habitat, specifically upland meadows with a minimum of 2-acres comprised of native bunch grasses, suitable for the ground nesting birds identified in the Nddb letter. Nonetheless, to maintain species protection, VHB recommends conferring with the farmer to identify areas for agricultural production prior to the 2026 growing season. If the currently fallow cropland/early successional area is to remain fallow in 2026, VHB recommends adhering to the time of year restriction in the Nddb letter to prevent incidental impact to ground nesting target species.

Sincerely,

VHB

Megan B. Raymond, MS, PWS, CFM

Director Natural Sciences