LODESTAR ENERGY

PETITION OF LSE PHOBOS LLC FOR A DECLARATORY RULING THAT NO CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED IS REQUIRED FOR THE CONSTRUCTION, OPERATION, AND MAINTENANCE OF A 4.05 MW SOLAR PHOTOVOLTAIC FACILITY IN MORRIS, CONNECTICUT

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STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

I. INTRODUCTION

Pursuant to Connecticut General Statutes ("Conn. Gen. Stat.") §§ 4-176 and 16-50k(a) and Regulations of Connecticut State Agencies § 16-*50l*-38 *et seq.,* LSE Phobos LLC, a Connecticut limited liability company ("Lodestar" or "Petitioner") is pleased to submit to the Connecticut Siting Council ("Council") this Petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required for the development, construction, operation, and maintenance of a 4.05 MW solar photovoltaic facility, and associated equipment occupying a total of approximately 19.92 acres of fenced-in solar panels ("Project" or "Facility"). The Project is a single axis tracker system.

The total site spans about 37.3 acres (inclusive of solar panels, transformers, electrical switchgear, monitoring equipment, and access roadways) (the "Site" or "Property") located west of South Street in Morris, Connecticut. The landowners are Linda K. Bertolette and Leonard H. Kesten (Co-Trustees of The Abraham Kesten Family Trust and CO-Executors of the Estate of Bina Kesten). The Facility will occupy approximately 19.92 acres ("Project Area") of the Property, which is currently used agriculturally as a cornfield. The parcel is relatively flat with a modest slope downward from east to west. The Site vehicular and interconnection access will be to the west of South Street.

The Facility is named in memory of Ms. Bertolette and Mr. Kesten's parents, Bina and Abraham Kesten, courageous Holocaust survivors who hoped their land would be used with care and purpose in a way that meaningfully supports sustainability in their community.

The energy generated from the Facility will be sold directly to Eversource. The Town of Morris will get direct tax benefits from the Facility including the payment of both real and personal property taxes of up to $50,000 annually.

Conn. Gen. Stat. § 16-50k(a) provides, in pertinent part:

> Except as provided in subsection (b) of section 16-50z, no person shall exercise any right of eminent domain in contemplation of, commence the preparation of the site for, commence the construction or supplying of a facility, or commence any modification of a facility, that may, as determined by the council, have a substantial adverse environmental effect in the state without having first

> obtained a certificate of environmental compatibility and public need, hereinafter referred to as a "certificate", issued with respect to such facility or modification by the council. Any facility with respect to which a certificate is required shall thereafter be built, maintained and operated in conformity with such certificate and any terms, limitations or conditions contained therein.
>
> ….
>
> Notwithstanding the provisions of this chapter or title 16a, the council shall, in the exercise of its jurisdiction over the siting of generating facilities, approve by declaratory ruling (A) the construction of a facility solely for the purpose of generating electricity, other than an electric generating facility that uses nuclear materials or coal as fuel, at a site where an electric generating facility operated prior to July 1, 2004, and (B) the construction or location of any fuel cell, unless the council finds a substantial adverse environmental effect, or of any customer-side distributed resources project or facility or grid-side distributed resources project or facility with a capacity of not more than sixty-five megawatts, as long as: (i) Such project meets air and water quality standards of the Department of Energy and Environmental Protection, (ii) the council does not find a substantial adverse environmental effect, and (iii) for a solar photovoltaic facility with a capacity of two or more megawatts, to be located on prime farmland or forestland, excluding any such facility that was selected by the Department of Energy and Environmental Protection in any solicitation issued prior to July 1, 2017, pursuant to section 16a-3f, 16a-3g or 16a-3j, the Department of Agriculture represents, in writing, to the council that such project will not materially affect the status of such land as prime farmland or the Department of Energy and Environmental Protection represents, in writing, to the council that such project will not materially affect the status of such land as core forest.

The Project will support the state's energy policies as set forth in Conn. Gen. Stat. § 16a-35k, including the goal to "develop and utilize renewable energy resources, such as solar and wind energy, to the maximum practicable extent." The Project will also provide clean, renewable, solar-powered electricity, and assist the state in meeting its legislatively mandated obligations under Connecticut's Renewable Portfolio Standard. The Project will assist the State of Connecticut in reducing greenhouse gas emissions and reducing criteria air pollutants associated with the displacement of older, less efficient, fossil fuel generation facilities.

As discussed in this Petition, the Petitioner's goal is to design an environmentally compatible Project that produces the maximum amount of energy while avoiding and minimizing adverse environmental impacts. Based on the information presented herein, the Project will not result in a substantial adverse environmental effect, particularly when compared to other potential development. Accordingly, the construction, operation, and maintenance of the Project satisfies the criteria of Conn. Gen. Stat. § 16-50k(a) and a Declaratory Ruling should be issued.

II. PETITIONER

Lodestar is a Connecticut-based limited liability company that develops renewable energy projects in Connecticut and across New England. Lodestar's principal place of business is located in West Hartford, Connecticut at 18 North Main Street, 2nd Floor. Lodestar will lead the Project's development, construction and financing and plans to be the long-term owner and operator of the Project. Lodestar has worked with utilities, school districts, cities, housing authorities, counties, private businesses, commercial and governmental clients to develop more than 125 MW of solar projects with a value of more than $350 million across the Northeastern US, including eleven (11) projects in Connecticut, including Petition 1638, approved in January 2025.

Please address all correspondence and/or communications regarding this Petition to:

Lee D. Hoffman, Esq.
Kathryn E. Boucher, Esq.
Liana Feinn, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103
lhoffman@pullcom.com
keboucher@pullcom.com
lfeinn@pullcom.com

Please also provide a copy of all such correspondence and/or communications to:

Jeffrey J. Macel
Sam Valone
LSE Phobos LLC
c/o Lodestar Energy LLC
18 North Main Street, 2nd Floor
West Hartford, CT 06107
jmacel@lodestarenergy.com
svalone@lodestarenergy.com

All parties listed above agree to accept electronic communications related to this Petition.

III. PROPOSED PROJECT

A. PROJECT BACKGROUND

The Project has been awarded a contract through the statewide Share Clean Energy Facilities ("SCEF") Program. The SCEF Program was developed pursuant to Section 7(a)(1)(C) of Public Act 18-50, An Act Concerning Connecticut's Energy Future, codified as Section 16244z(a)(1)(C) of the General Statutes of Connecticut. The SCEF Program seeks the deployment of new or incremental Class I renewable generation projects ranging in size from 100 to 5,000 kW (AC) for a 20-year term. Eligible projects are chosen through a competitive bidding procurement process each year, for a total of 6 years.

B. SITE SELECTION

Lodestar and its experienced development team designed the proposed project to minimize or avoid potential environmental impacts. Site selection was guided by key criteria, including location suitability (size, topography, and the absence of significant biological or hydrological constraints identified in the initial screening), as well as proximity to existing electrical infrastructure and the ability to secure interconnection approval from the local utility.

The site selection process was systematic and multi-staged. Lodestar began by evaluating interconnection opportunities across several substations and circuits in Connecticut. From this analysis, 200 potential sites were identified that met preliminary requirements for interconnection, environmental sensitivity, and buildability. During the site selection and evaluation process, Lodestar retained the following consultants to assist in the evaluation and design of the Project:

- Solli – civil engineering, stormwater design, environmental assessment
- Archaeological Consulting Services LLC– archeological consulting
- ArcDesign – interconnection design and medium voltage analysis
- Vanasse Hangen Brustlin (“VHB”) – acoustical analysis

C. PROPERTY DESCRIPTION

The proposed Project will occupy ±19.92 acres of the Property, which is designated as 03/680/166 by the Town’s Assessor’s Office and which is zoned as 6-1 Farm Land. Interconnection and vehicle access will extend west off of South Street. The Property’s existing topography modestly slopes downward from east to west, ranging from approximately 250 feet above mean sea level (“AMSL”) to 1,000 feet AMSL. The surrounding area includes a mix of undeveloped wooded land and residential development. The Project will not alter or obstruct views from state or local roads. The nearest residence to the Project, 57 North Terrell Road, will be 194 feet from the nearest fence line of the Project Area. The nearest open space, Camp Columbia State Park, lies about 0.2 miles from the site and contains hiking trails. With existing tree cover and site grading, the Project will not be visible from these trails, ensuring no scenic or visual impacts to the park or surrounding areas. A remote field review is provided in **Exhibit 10**.

D. PROJECT DESCRIPTION

If this Project is approved by the Siting Council, Lodestar will proceed to construct, operate, and maintain the solar facility at the Project Site. Upon its completion, the Facility will consist of one (1) array with a total of 8,600 photovoltaic modules (“Panels”) and associated equipment. A single axis tracker racking system will be used to secure the Panels. Construction of the Project will require 5.47 acres of tree clearing. Once complete, the Facility will occupy approximately 16.42 acres inside the project fence, with an additional 3.5 acres of improvements beyond the fenced limits, for a total Project Area of ±19.92 acres. There will be an eight-foot security fence around the perimeter of the array. For further screening, plantings of Evergreen trees will be added along the northern and southern edge of the array. Emergency access will be available via South Street and will be designed in accordance with local requirements to accommodate emergency vehicles and fire trucks. The panels will be mounted on a driven post racking system. The system will be an east-west single axis tracker, with a maximum angle of 60 degrees East-West to maximize energy production. The maximum height of the panels will be approximately ten (10) feet. The image below is an example of the type of panels and racking system that will be utilized.

Inverters will be mounted at a centralized pad location, where small concrete pads will also be installed for transformers and switchgear. The inverters are 201 feet from the nearest property line. At the end of the operational life of the Project, Lodestar will remove all equipment (e.g., racking system, Panels, inverters, electrical collection system, equipment pads, etc.) from the Project Site, recycle all recyclable materials, and dispose of all non-recyclable materials in accordance with applicable law. Lodestar will install the Project in the area shown on the Site Plan in **Exhibit 1**. The image below is an example of a similar solar array field installed by the Petitioner.

Estimated project costs are eight million nine hundred thousand dollars ($8,900,000), including engineering, procurement, construction, and interconnection upgrades.

The permits required for this Project include a general permit for the discharge of stormwater and dewatering wastewaters from construction activities (“Stormwater Permit”) from the Department of Energy and Environmental Protection (“DEEP”) and an encroachment permit from the CT Department of Transportation. Local permits will consist of local building and electrical permits from the Town of Morris, which will be obtained closer to construction.

E. CONSTRUCTION

The construction of the Project is anticipated to take six to nine months, depending on the timing of applicable approvals, requiring the services of local electrical, civil and structural contractors. The initial phase of construction will include the creation of an access road, clearing and grubbing of the stormwater controls and, as required by DEEP, construction activities will not commence until full site stabilization has occurred.

Next, steel foundations will be driven into the ground for the arrays. Steel racking components will be mounted on these foundations followed by the installation of photovoltaic modules. The electrical contractor will then install conductors from the photovoltaic modules to the inverters and then to the transformers on the equipment pad. Eversource will install three (3) utility poles at the interconnection and the customer will install three (3) new utility poles at the interconnection access point to facilitate utility interconnection to the site. The electrical contractor will then install a medium voltage circuit underground to the equipment pads on the eastern edge of the array. The construction schedule will be based on a six (6) day work week, Monday through Saturday between the hours of 7:00 AM and 5:00 PM, but may be modified if required to comply with Town of Morris requirements. As noted above, the Petitioner will utilize erosion and sedimentation control consistent with the Connecticut Guidelines for Erosion and Sedimentation Control throughout construction of the Project.

The Project construction period is estimated to take approximately six to nine months from issuance of all required permits, due to the required growing season between periods of disturbance. The Petitioner anticipates commencing construction in 2027.

Anticipated Project Schedule:

Task	**Approximate Duration**
Mobilization and site preparation	2 weeks
Civil work: road construction, tree clearing, grading and stormwater controls	4-8 weeks
Site Stabilization	8-12 weeks
Racking, panel & electrical installation	8 weeks
Interconnection and medium voltage	3 weeks
System testing	1 week
Approvals & commissioning	2 weeks

F. UTILITIES AND INTERCONNECTION

Lodestar proposes interconnecting the Project to an existing 23 kV overhead circuit that runs along South Street on the eastern edge of the Property, which is part of Eversource's distribution system. The circuit connects to the 11S Carmel Hill Substation which is 23.9 MVA. Lodestar previously completed an interconnection application and Eversource determined that the distribution circuit located along South Street is suitable for the additional output from the Project. The interconnection impact studies are complete, and the Project has received an interconnection services agreement to allow the Project to interconnect in the manner set forth above.

Eversource's interconnection of the array will require the installation of six (6) new poles off South Street. The Petitioner has worked with Eversource to minimize the number of necessary poles. For each interconnection, Eversource will own and install an angle pole on the first new pole, a pole- mounted recloser on the second new pole and a pole-mounted primary meter at the third new pole. The point of common coupling will be on the load side of the primary metering cluster. The customer will install a load break on the fourth new pole, a recloser on the fifth new pole, and a riser for the sixth pole which will then direct the interconnection underground to the array. This is a similar process and configuration that has been used on all of Lodestar's previous projects across Connecticut.

G. EQUIPMENT AND ENERGY PRODUCTION

The design of the Project focuses on maximizing the efficiency of the system based on existing conditions of the Site and local weather patterns while, at the same time, minimizing environmental impacts. Within this layout, approximately 8,600 photovoltaic panels will be installed as a single-access tracker system. The selected modules are manufactured by Silfab SIL-580-XM+Bifacial, each with a capacity of 580 watts. The array will feed 27 SMA PEAK3 SHP 150kW inverters for a total output of approximately 4.05 MW. **Exhibit 6, Appendix D** contains a manufacture specification sheet for the modules and inverters. **Exhibit 9** is a copy of the passing Toxicity Characteristic Leaching Procedure (TCLP) test results from the manufacture, verifying that the panels comply with TCLP requirements.

The operational life of the Project is based on the designed life expectancy of the equipment. The equipment for the Project consists of modules, racking and inverters.

Photovoltaic modules and racking equipment have a designed life and warranty extending for no less than twenty (20) years. Therefore, the anticipated operational life of the Project is twenty (20) plus years. At the end of the operational life of the Project, Lodestar will remove all equipment (*e.g.*, racking system, Panels, inverters, electrical collection system, etc.) from the Project Site, recycle all recyclable materials and dispose of all non-recyclable materials in accordance with applicable law. See **Exhibit 4.**

In the event of a fault or power outage within the solar facility and/or the South Street distribution circuit, the Project is required to be isolated from the distribution circuit per IEEE standard 1547 and UL standards 1741 and 1741SA. The Project's inverters continuously monitor for deviations in frequency, current and voltage outside of Eversource's parameters. If a fault is detected, the inverter automatically restricts the Project from production, effectively preventing the flow through the distribution circuit.

IV. PROJECT BENEFITS AND NEEDS ANALYSIS

Lodestar has conducted an independent analysis of the Carbon Debt and Carbon Offsets of this Project, as seen in **Exhibit 8**. There are demonstrable net benefits to the construction and operation of the solar Project which significantly offset the proposed 5.47 acres of clearing. The proposed solar Project is calculated to produce 6,947 MWh of energy during the first operational year. The net result of the Project is a carbon offset of 4,662.9 MT CO2 in the first year. It will take less than one (1) day to recover the loss of carbon sequestration by the 5.47 acres of cleared trees with benefits accruing over twenty (20) years. Greenhouse gas equivalencies for this estimated offset include:

- 1,089 gasoline-powered passenger vehicles driven for one (1) year;
- 5,184,558 pounds of coal burned; and
- 627 homes' energy use for one year.

Once the Project is at the end of its useful life, it will be fully decommissioned and removed. All recyclable materials will be recycled, and all non-recyclable materials will be disposed of in accordance with applicable law. This process will restore the land, making it available for future reuse – a sustainable conclusion to the Project's lifecycle.

As noted earlier, the Project has secured a 20-year Power Purchase Agreement (PPA) through the SCEF program. This reflects the state's assessment that the Project aligns with and supports its clean energy and zero-carbon objectives and that there is a public need for this Project to increase reliability of the State's electrical grid and to provide clean, renewable energy.

V. LOCAL OUTREACH & PUBLIC NOTICE

Lodestar virtually met with the Town of Morris' First Selectman, Tom Weik, on March 24, 2025. Lodestar shared the project concept plan and suggested another meeting with additional Town representatives. Tom Weik appreciated the visual screening, the setback from the road, and general discreteness of the Project.

Lodestar sent the technical report and site plan via USPS Priority Mail on April 16, 2025 to Representative Karen Reddington-Hughes, Senator Stephen Harding, the Town of Morris' First Selectman Tom Weik, Planning and Zoning Commission Chair David Wiig, Inland Wetlands Commission Chair Michael Doyle, Zoning Enforcement Officer Tony Adili, and the Town of Bethlehem's First Selectman Stephen F. Sordi, Inland Wetlands and Watercourses Agency Chairman Christopher T. Gallo, and Planning Commission Chair Marjorie B. O'Neill. The same technical report was also sent via email to Representative Karen Reddington-Hughes, Senator Stephen Harding, Tom Weik, and Stephen F. Sordi.

Lodestar presented the site plan to the Morris Board of Selectmen on May 20, 2025. Those in attendance included First Selectman Tom Weik, Selectman Vinnie Aiello, Selectman Denise Weik, and Zoning Enforcement Officer Tony Adili. During the meeting, Lodestar provided a high-level overview of the site plan and the proposed permitting pathway. The Town expressed appreciation for several aspects of the Project's thoughtful design. Notably, the Town indicated that it was pleased that the solar array is set back from the road. Lodestar confirmed that the front field will not have solar panels installed, maintaining open space and minimizing visual impact. The Project also includes substantial visual screening measures to further reduce visibility from public vantage points and neighboring properties. Additionally, the equipment pads are located far from nearby residences, addressing potential concerns related to noise or proximity. These design elements were well received by the Town. Lodestar followed up with Tom Weik, Vinnie Aiello, and Denise Weik over email on August 5, 2025 to give them the sheep grazing plan. All of the outreach is summarized in **Exhibit 5**.

VI. NO SUBSTANTIAL ENVIRONMENTAL IMPACTS

On May 14, 2025, the Petitioner participated in a pre-application meeting with DEEP, during which DEEP did not identify any specific concerns regarding the Project. Additionally, on December 16, 2024, DEEP's Natural Diversity Data Base (NDDB) issued a Final Determination for the Project (See **Exhibit 6, Appendix B**). Lodestar also plans to submit an application for a Stormwater Permit with DEEP.

A. AIR QUALITY

The Project will not generate any emissions but rather, as demonstrated in **Exhibit 8**, the Project will contribute to carbon reduction. The Project will not generate air emissions during operation and only very minor air emissions of regulated air pollutants and greenhouse gasses during construction from the conventional construction equipment used to install the Project. Lodestar will control any temporary emissions at the Project Site by enacting appropriate mitigation measures *(e.g.*, water for dust control; avoid mass early morning vehicle startups, etc.)

B. FOREST, SOIL AND WILDLIFE RESOURCES

Development of the proposed Project will primarily occur within existing cropland, a habitat that is common in this region of Connecticut and generally supports adaptable, generalist wildlife species. Impacts to this upland habitat are expected to be minimal and are not anticipated to adversely affect wildlife. The Project will minimize changes to existing vegetation, exclude only larger wildlife species through fencing, and reduce human-related disturbance both during and after construction.

Converting cropland into native grassland will create new opportunities for grazing, nesting, and pollination that will support a variety of species. Larger animals excluded from the fenced area will continue to use the surrounding forest and farmland, including extensive protected lands nearby. Because most of the species present are common and tolerant of disturbance, they are likely to adapt and move to suitable nearby habitats. For these reasons, the Project is not anticipated to result in significant adverse impacts to local wildlife.

NDDB maps indicate that the Project Site does not fall within a mapped buffer for listed species, but DEEP reviewed and confirmed potential impacts to the state-endangered Northern long-eared bat due to the Site's proximity to a known hibernaculum. DEEP recommends that tree removal will be restricted between April 15 and October 31, and the Petitioner will abide by this recommendation. More information can be found in **Exhibit 6**.

Approximately 11.1-acres of the Property is considered Core Forest. The proposed Project will replace approximately 1.3-acres of this system with a proposed grassland accommodating a solar array. For more information refer to **Exhibit 6** (Figure 6, Forested Habitat Impact Map, included in Appendix A). CT DEEP's Forestry Division determined the Project is not anticipated to materially impact core forest.

Of the total 37.3-acre Property, approximately 19.7 acres are classified as "Prime Farmland Soils," and 14.86 of those acres will be impacted by the Project's footprint. These soils will be protected through minimally intrusive construction practices and soil management measures. Grading will be limited through the use of solar tracker systems and by siting panels in areas where existing grades are similar to proposed conditions. In locations where prime farmland soils must be disturbed, topsoil will be stripped, stockpiled separately from subsoils, and redistributed to promote healthy vegetation growth. Over the life of the Project, grass within the fenced area will be maintained through sheep grazing, while exterior areas will be periodically mowed, reducing the need for mechanical or chemical vegetation management. Further, use of sheep at the site aligns with the Department of Agriculture's recommendations for co-use of agrivoltaics, such as the growth of crops and/or livestock grazing between or under solar panels.

At the end of the Facility's lifespan, the Project will be fully decommissioned, disturbed areas will be restored with native soils, and the Site will be reseeded with a pollinator-friendly blend or an equivalent seed mix approved at that time. These measures are intended to ensure that the Project does not result in permanent impacts to prime farmland soils. The Department of Agriculture has determined that this Project does not materially affect prime farmland (see **Exhibit 6, Appendix F).**

C. WETLANDS AND WATERCOURSES

A segment of East Spring Brook will be crossed using an engineered timber bridge supported by timber pilings. The bridge will measure approximately 14 feet in width and 117 feet in length. Construction will employ top-down, industry-leading, low-impact techniques that significantly reduce temporary and permanent disturbances to the surrounding wetlands. All dredged material removed during the installation of timber pilings will be contained, collected, and fully removed from the site, ensuring no redeposition on wetland soils or vegetation. The design and installation of the pilings will not result in a discharge of fill material, nor will it impair the reach, flow, or circulation of the wetland or adversely affect its existing aquatic functions. In fact, the proposed crossing will help maintain and improve the wetland and watercourse system's primary function of water conveyance by replacing the existing informal drive, thereby eliminating current soil erosion and sedimentation impacts to downstream areas. All other Project activities are located outside wetlands and watercourses, with most more than 100 feet away. With proposed soil erosion, sediment control, and stormwater management measures, no long-term adverse impacts to wetlands or watercourses are anticipated.

D. STORMWATER MANAGEMENT

The Project's stormwater design complies with the 2024 Connecticut Stormwater Quality Manual, DEEP's Stormwater Permit, including Appendix I for solar projects. It addresses peak flow management, water quality treatment, and soil erosion and sedimentation controls. A Stormwater Pollution Control Plan, subject to DEEP review, will guide construction-phase protections such as silt fencing, anti-tracking pads, phased clearing, and temporary stabilization.

To maintain existing drainage patterns within the state right-of-way, an 18" culvert is proposed under the access drive. The project includes unavoidable temporary impacts to the eastern wetland on-site to install timber pilings as part of a timber bridge system to provide access over the wetlands. The timber bridge will be designed and constructed utilizing the leading-edge top-down construction methods with low impact construction techniques that minimize both temporary and permanent disturbance to the wetlands.

In the long term, no adverse impacts from stormwater are anticipated. The Project introduces minimal impervious area, and with site stabilization, the land will be converted from cropland and woodland to meadow, improving infiltration and reducing runoff. Supporting calculations demonstrating decreased peak flows under proposed conditions are included in the Stormwater Report (**Exhibit 11**).

E. FLOODPLAINS

The most recent available mapping from the Federal Emergency Management Agency (FEMA) was reviewed regarding the presence or absence of flood zones or floodways at the

Property. According to the FEMA Flood Map Service Center, flood map number 0901760005A, effective on September 30, 1981, a majority of the Property and Project Area falls within "Zone X", as defined by FEMA as "areas of 1% annual chance flooding". This indicates that the Project Site is not within a regulated flood zone and requires no special considerations relative to flooding for its implementation.

F. DRINKING WATER RESOURCES

The Project is not anticipated to result in any adverse impact to either ground or surface water resources. The Site is not located in an Aquifer Protection Area. A public water system serves the area surrounding the Site. Typical construction techniques for installation of the Facility do not require blasting or other similar measures. Construction and operation of the Facility should have no impact on groundwater resources.

Provided that erosion and sediment controls are installed and maintained in accordance with the Connecticut Guidelines for Soil Erosion and Sediment Control and stormwater is managed in accordance with the Connecticut Stormwater Quality Manual, no adverse effect on surface water quality is anticipated from development and operation of the Project.

G. HISTORIC AND SCENIC VALUES

No state road or local road will be affected physically or impaired visually by the Project. The closest open space is Camp Columbia State Park which is approximately 0.2 miles from the Project Site. Protected trails are located within Camp Columbia State Park; however, due to tree cover and grading, the Project Area will not be visible from these trails. The Project will not physically affect or visually impair these spaces. For more information regarding resources located within one mile of the Site refer to **Exhibit 6** (Figure 8, Surrounding Features Map, included in Appendix A).

A Phase 1A cultural resources survey conducted by Archaeological Consulting Services LLC in March 2025 found the Project Area to have low sensitivity for historic resources and low to moderate sensitivity for prehistoric resources. The Petitioner will conduct a Phase 1B survey once the tenant farmer has finished their seasonal harvest. See **Exhibit 6, Appendix D** for Phase 1A report.

H. PUBLIC HEALTH AND SAFETY

Lodestar places safety as a top priority, and the Project will meet or exceed all health and safety requirements applicable for electric power generation. The Project would be designed to applicable industry, state and local codes and standards and will not pose a safety concern or create undue hazard to the public. The Project includes a proposed eight (8) foot high safety fence and locked gate (which is mandated by National Electric Code), which will limit access to authorized or emergency personnel only. Each employee working on the Project Site will:

- Receive required general and Site-specific health and safety training;
- Comply with all health and safety controls as directed by local, state, and federal requirements;
- Understand and employ the Site health and safety plan;
- Know the location of local emergency care facilities, travel times, ingress and egress routes;
- Immediately report all unsafe conditions to the construction manager; and
- Provide detailed safety and emergency response training for Morris municipal employees.

I. NOISE

VHB conducted an acoustical analysis (see **Exhibit 7**) of the Project's mechanical equipment, which includes twenty-seven (27) inverters, two (2) transformers, and three hundred forty-four (344) single axis tracking system motors. The analysis conservatively assumed that neighboring properties currently experience sound levels below DEEP's noise standards and that the high background noise areas guidance (Sec 22a-69-3.6) does not apply. A 5 dBA penalty was also factored in for potential tonal noise from the equipment. Given the low noise output of the equipment and the distance to nearby property boundaries, the sound levels are expected to be well below DEEP's noise standards, and as a result, noise mitigation measures are not proposed for this Project.

J. FEDERAL AVIATION ADMINISTRATION ("FAA")

The FAA Notice Criteria Tool was used to screen the Project Site and determine whether the Project triggers any FAA notice requirements. The initial screening, completed on January 29, 2025, concluded that no additional FAA notice is required. For further details, see **Exhibit 6, Appendix F**.

K. VISIBILITY

The solar panel Facility will feature trackers with a maximum height of 10 feet above finished grade. All areas disturbed during construction will be contained within an 8-foot agricultural fence. Existing trees along the Property's perimeter will be preserved and maintained to the extent feasible. Due to the surrounding tree coverage, most neighboring properties will only have seasonal views of the Facility. Year-round visibility is limited to three properties: 41 and 51 North Terrell Farm Road to the north, and 210 South Street to the south. To reduce year-round visibility from these locations, forty (40) Green Giant Arborvitae are planned along the northern boundary, and fifty (50) along the southern boundary. See **Exhibit 6, Appendix A** for the viewshed map.

L. ELECTRIC AND MAGNETIC FIELDS

Existing sources of electric and magnetic fields ("EMF") along the boundaries of the Project Site include the EMF associated with the Eversource 23-kV overhead distribution line to which the electricity from the solar arrays will connect. During Project operation, EMF on the Project Site is expected to originate from the following sources: (1) the DC solar panels, (2) DC cables connecting the solar arrays to the power inverter, (3) AC power inverters that convert DC power to AC, and (4) the underground 23-kV interconnection and the existing Eversource 23-kV distribution line.

The proposed DC solar panels will be positioned at least 50 feet from the Site boundaries and the proposed AC power inverters and AC transformers will be positioned at least 200 feet from the Site boundaries, with the nearest residencies located even further away. Although DC magnetic fields from the cables connecting the solar arrays to the inverters will generate a DC magnetic field, this EMF is expected to be only a small fraction of the Earth's natural static geomagnetic field.

Higher-frequency AC fields from the inverters, like the DC fields from the solar panels, generally reduce to near-background levels within a short distance of the equipment. Therefore, these sources are not expected to significantly affect EMF levels outside the Project Site. Given the substantial distance of the Project Area from the Site boundaries, EMF from the solar panels, power inverters, and associated equipment is not anticipated to impact EMF levels beyond the Project Site boundary. Recent studies on projects of similar scale have been conducted, with an example available in Appendix S of the Application in Docket 497.

VII. CONCLUSION

This Project is precisely the type of project that Connecticut legislature, regulatory agencies, environmental groups, utilities, and ratepayers have been promoting to support our State's renewable energy goals and provide savings and tax benefits to municipal customers like the Town of Morris. Accordingly, and for the reasons stated herein, the Petitioner respectfully requests that the Council approve the location and construction of the proposed Project by declaratory ruling.