

June 15, 2023

DC Energy Innovations
Attn: Ben Gordesky
bgordesky@cdceivt.com
5072 US Route 2
North Hero, VT 05474

Re: GMG Farms, LLC – Charlotte – 45-day Notice of Application (#23-1438-AN)

Dear Mr. Gordesky,

The Chittenden County Regional Planning Commission (“CCRPC”) is in receipt of the 45-day notice of application submitted by GMG Farms, LLC for the construction of a 35 kW solar array to be located at 700 Greenbush Road in Charlotte, VT. CCRPC has reviewed this project’s conformance with CCRPC’s 2018 Chittenden County ECOS Plan, which gained a Determination of Energy Compliance from the Vermont Department of Public Service on August 9, 2018.

ECOS Energy Goal

CCRPC finds that this project meets the intent of the Energy Goal (Goal #17) of the *2018 ECOS Plan*: “Move Chittenden County’s energy system toward a cleaner, more efficient and renewable system that benefits health, economic development, and the local/global climate by working towards the State’s Comprehensive Energy Plan goals.”

Strategy 2, Action 4b of the ECOS Plan states “CCRPC supports the generation of new renewable energy in the County to meet the Vermont Comprehensive Energy Plan’s goals of using 90% renewable energy by 2050, in a manner that is cost effective and respects the natural environment.” Development of this solar array implements this action.

The ECOS Plan’s suitability policies help determine whether projects are cost effective and the ECOS Plan’s constraint policies help determine whether projects respect the natural environment.

Suitability Policies

The *2018 ECOS Plan* recommends the location of renewable energy generation facilities in appropriate locations, as defined by the policies in Strategy 2, Action 4b. Inability to meet these guidelines does not necessarily preclude the ability to develop renewable energy generation development. CCRPC finds that the location of this project meets the following suitability policies of the 2018 ECOS Plan:

1. Locate energy generation proximate to existing distribution and transmission infrastructure with adequate capacity and near areas with high electric load (See Green Mountain Power’s Solar Map and Burlington Electric Department’s Distributed Generation Map). The proposed project is located near a VELCO transmission line.
2. Locate ground-mounted solar larger than 15 kW AC...outside of state designated village centers, growth centers, downtowns, new town centers, neighborhood development areas, and historic

districts on the State or National Register. The proposed project is not located near a designated center or historic district.

Constraints Policies

The *2018 ECOS Plan* states that development should be located to avoid state and local known constraints that have been field verified, and to minimize impacts to state and local possible constraints that have been field verified (Strategy 3, Action 1.f and Strategy 4, Action 1.f and Action 2.e).

Our review indicates that the following **State known constraints** may be impacted by the project:

- Class 1 and 2 Wetlands: A Class II wetland appears to be located in the northwest corner of site. CCRPC requests that the wetlands be delineated by a qualified professional and wetland boundaries be shown in the full petition. If wetlands exist on site, the full petition should confirm that no new infrastructure will impact the wetlands; unless approval is received from the Vermont Agency of Natural Resources.

Our review indicates that the following **State possible constraints** may be impacted by the project:

- Agricultural Soils and Hydric Soils: The proposed project appears to be located on primary agricultural soils and hydric soils. CCRPC requests that impacts to the agricultural soils be minimized in accordance with the recommendations of the Vermont Agency of Agriculture, Food, and Markets.
- Protected Lands: Vermont Land Trust (VLT) holds a covenant on property. CCRPC requests that the applicant work with VLT to determine whether the proposed array is consistent with the easement restrictions.

Our review indicates that the following **local possible constraints** may be impacted by this project:

- Land in Active Agriculture: The parcel is actively being farmed, but the proposed array appears to be located in an area not currently used for cultivation. However, CCRPC recommends that the applicant work with the Town of Charlotte to determine how any potential impacts to this constraint may be avoided or mitigated.

These comments are based on information currently available; we may have additional comments as the process continues. We understand that the project may change between the submittal of the advance notice and the final petition. CCRPC will review the project location again with each new submittal to confirm our findings.

Please feel free to contact me with any questions.

Sincerely,



Charlie Baker
Executive Director

CC: CCRPC Board, Dean Bloch, Town Administrator