

November 1, 2023

Holly R. Anderson
Clerk of the Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: GMG Farms, LLC – Charlotte – Net-Metering Petition for Certificate of Public Good (#23-3505-NM)

Dear Ms. Anderson,

The Chittenden County Regional Planning Commission (“CCRPC”) is in receipt of the above-named petition 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 polices 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 constraint** is present on the site but will not be impacted by the project.

- Class 1 and 2 Wetlands: The petitioner's site plans indicate that the proposed array will not impact any delineated wetlands on the site or their associated buffers. CCRPC has no further concerns regarding this constraint.

Our review indicates that the following **State possible constraints** are present on the site but will not be impacted by the project.

- Agricultural Soils and Hydric Soils: The proposed project appears to be located on primary agricultural soils and hydric soils. The petitioner's response to CCRPC's advance notice comments indicates that the proposed array is not located on land actively used for agriculture and will not impact drainage of nearby agricultural soils. Nevertheless, CCRPC requests that impacts to the agricultural soils be minimized in accordance with any recommendations of the Vermont Agency of Agriculture, Food, and Markets.
- Protected Lands: The petitioner states in their filing that the proposed facility will comply with the conditions of the property's restrictive covenant deed held by Vermont Land Trust. CCRPC has no further concerns regarding this constraint.

Our review indicates that the following **local possible constraint** is present on the site but will not be impacted by the project.

- Land in Active Agriculture: The parcel is actively being farmed, but the petitioner states in their filing that the proposed array will not impact agricultural operations because it will be located too close to the existing greenhouse for agricultural equipment to be used safely. Therefore, CCRPC has no further concerns regarding this constraint, but defers to any concerns that may be raised by the Town of Charlotte.

These comments are based on information currently available; we may have additional comments as the process continues. 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