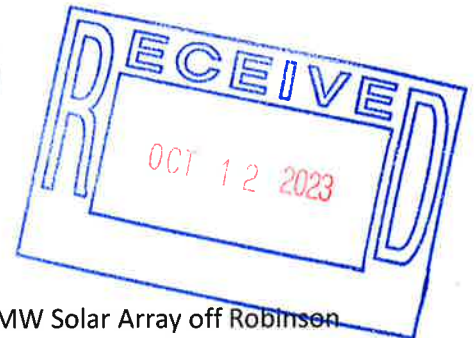




September 29, 2023

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



Re: Essex A North Lot Solar, LLC (GlobalFoundries) Petition for 4.95 MW Solar Array off Robinson Parkway, Essex Junction (case #23-2606-AN)

Dear Ms. Anderson,

The City of Essex Junction has received the 45-day notice of the above-named application submitted by Encore Renewable Energy to develop a 2.8 MW solar array to be located off Robinson Parkway in Essex Junction, VT on a parcel owned by GlobalFoundries, Inc.

The City's Planning Commission has reviewed this project's conformance with the Essex Community Enhanced Energy Plan, and with the Essex Junction Comprehensive Plan, both of which were adopted in 2019.

Essex Community Enhanced Energy Plan Renewable Energy Goal

The City finds that this project meets the intent of the Renewable Energy Generation Goal of the Enhanced Energy Plan, which aims to "generate between 211,386 and 353,629 Mwh of renewable energy by 2050".

The Enhanced Energy Plan recognizes the potential for a significant portion of the City's total solar generation potential to be realized on existing impervious surfaces, such as paved areas. Page 21 of the Plan states that "Because these sites are already developed, solar generation may be compatible with other land uses if developed in a way that is in harmony with existing development patterns and existing aesthetic norms". The proposed solar project is mostly sited on existing impervious surface parking lots.

Constraints Policies

The Enhanced Energy Plan states that renewable energy facility development should be located to avoid state and local known constraints, and to minimize impacts to state and local possible constraints. Our review indicates that the following constraints are located on the property:

State Possible Constraints

- **Agricultural and Hydric Soils.** Primary Agricultural Soils underlie a majority of the site, some of which may be considered previously impacted by the development of the existing parking lots. The City of Essex Junction requests that further impacts to the agricultural soils be minimized in accordance with the recommendations of the Vermont Agency of Agriculture, Food, and Markets.

Local Known Constraints

- **Slopes of 20% and steeper are NOT considered to be Local Known Constraints within the City of Essex Junction.** While the Enhanced Energy Plan generally lists the slopes of 20% and steeper to be a “local known constraint”, the City does not prohibit the siting of solar generation in these areas (unlike the Town of Essex, which does). As such, these areas are not shown within Map 2 of the Plan within the boundaries of the City of Essex Junction.

Siting Policies

The site meets the Essex Junction Enhanced Energy Plan’s siting policies, which define characteristics of sites where the City encourages renewable energy generation facilities. These relevant standards, with the most applicable components bolded for emphasis are:

- Policy 1: “The Essex Community strongly encourages development of renewable energy generation facilities on rooftops, **parking lots**, on parcels or directly adjacent parcels to a customer that has been allocated more than fifty percent of the net-metered system’s electrical output, **previously-developed sites**, brownfields, landfills, former mineral resource extraction areas, and municipally designated sites.”.
- Policy 5: “Locate energy generation **proximate to existing distribution and transmission infrastructure** with adequate capacity and **near areas with high electric load** to reduce the need for new distribution and transmission extensions.

This review is based on the information currently available. The City of Essex Junction will review and comment on materials submitted as the Section 248 review process continues.

Thank you for your time and attention.

Sincerely,



Patrick Scheld
Essex Junction Planning Commission Vice-Chair

CC: Essex Junction City Council
Chris Yuen, Essex Junction Community Development Director



September 29, 2023

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

Re: Essex B1 Parking Lot Solar, LLC (GlobalFoundries) Petition for 2.8 MW Solar Array off Robinson Parkway, Essex Junction (case #23-2607-AN)

Dear Ms. Anderson,

The City of Essex Junction has received the 45-day notice of the above-named application submitted by Encore Renewable Energy to develop a 2.8 MW solar array to be located off Robinson Parkway in Essex Junction, VT on a parcel owned by GlobalFoundries, Inc.

The City's Planning Commission has reviewed this project's conformance with the Essex Community Enhanced Energy Plan, and with the Essex Junction Comprehensive Plan, both of which were adopted in 2019.

Essex Community Enhanced Energy Plan Renewable Energy Goal

The City finds that this project meets the intent of the Renewable Energy Generation Goal of the Enhanced Energy Plan, which aims to "generate between 211,386 and 353,629 Mwh of renewable energy by 2050".

The Enhanced Energy Plan recognizes the potential for a significant portion of the City's total solar generation potential to be realized on existing impervious surfaces, such as paved areas. Page 21 of the Plan states that "Because these sites are already developed, solar generation may be compatible with other land uses if developed in a way that is in harmony with existing development patterns and existing aesthetic norms". The proposed solar project is mostly sited on existing impervious surface parking lots.

Constraints Policies

The Enhanced Energy Plan states that renewable energy facility development should be located to avoid state and local known constraints, and to minimize impacts to state and local possible constraints. Our review indicates that the following constraints are located on the property:

State Possible Constraints

- **Agricultural and Hydric Soils.** Primary Agricultural Soils underlie a majority of the site, some of which may be considered previously impacted by the development of the existing parking lots. The City of Essex Junction requests that further impacts to the agricultural soils be minimized in accordance with the recommendations of the Vermont Agency of Agriculture, Food, and Markets.

Local Known Constraints

- **Slopes of 20% and steeper are NOT considered to be Local Known Constraints within the City of Essex Junction.** While the Enhanced Energy Plan generally lists the slopes of 20% and steeper to be a “local known constraint”, the City does not prohibit the siting of solar generation in these areas (unlike the Town of Essex, which does). As such, these areas are not shown within Map 2 of the Plan within the boundaries of the City of Essex Junction.

Siting Policies

The site meets the Essex Junction Enhanced Energy Plan’s siting policies, which define characteristics of sites where the City encourages renewable energy generation facilities. These relevant standards, with the most applicable components bolded for emphasis are:

- Policy 1: “The Essex Community strongly encourages development of renewable energy generation facilities on rooftops, **parking lots**, on parcels or directly adjacent parcels to a customer that has been allocated more than fifty percent of the net-metered system’s electrical output, **previously-developed sites**, brownfields, landfills, former mineral resource extraction areas, and municipally designated sites.”.
- Policy 5: “Locate energy generation **proximate to existing distribution and transmission infrastructure** with adequate capacity and **near areas with high electric load** to reduce the need for new distribution and transmission extensions.

Alignment with area Master Plan

The City notes that the “Group B” solar installation are proposed to be sited within an area that was the subject of IBM’s 2012 North Quadrant Master Plan. Solar arrays are proposed within areas previously envisioned for new industrial and office buildings. Global Foundries has indicated that their plans have changed since the acquisition of the site from IBM. and as such, they plan on updating the master plan in the future to include the solar installations.

This review is based on the information currently available. The City of Essex Junction will review and comment on materials submitted as the Section 248 review process continues.

Thank you for your time and attention.

Sincerely,



Patrick Scheld
Essex Junction Planning Commission Vice-Chair

CC: Essex Junction City Council
Chris Yuen, Essex Junction Community Development Director

City of Essex Junction
2 Lincoln Street
Essex Junction, VT 05452-3154

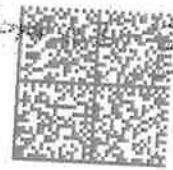


Holly R. Anderson
Clerk of the Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

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