



To: Essex A North Lot Solar Project File

Date: May 13, 2026

Memorandum

Project #: R058972.001

From: Allison Slaney, PWS;
Environmental Scientist and
Adam Crary, SPWS, PWD;
Regulatory Team Leader, Renewables

Re: Supplement to the Section 248 Natural Resources Assessment

Introduction

On behalf of Essex A North Lot Solar, LLC ("EANL" or "CPG Holder"), VHB is providing this memorandum to describe VHB's review of impacts to natural resources following minor changes to the 3.5-megawatt ("MW") alternating current ("AC") ground-mounted solar project ("Project"), approved on GlobalFoundries property in the City of Essex Junction, Vermont, located between Maple Street (Vermont Route 117) and Robinson Parkway. The Project received a Certificate of Public Good ("CPG") from the Vermont Public Utility Commission ("PUC") (Case No. 24-1898-PET) on January 6, 2025, and is requesting a non-substantial change to the CPG as a result of minor Project modifications.

EANL was ultimately unable to secure the property rights to build the approved point of interconnection ("POI") infrastructure in accordance with the issued CPG. In response, EANL worked with GMP, GlobalFoundries, and the City, to develop a revised interconnection route that is acceptable to each party. The proposed Project changes are detailed in the Motion for Non-Substantial Change Determination and also depicted on the revised Vermont Wetland Permit Impact Exhibit, included as **Attachment 1**.

This memorandum is intended to supplement VHB's overall Natural Resources Assessment memorandum provided with the Project's CPG petition as Exhibit EANL-AC-2. Based on VHB's review of the 30 V.S.A. § 248(b)(5) natural resources criteria, Wetlands (§ 6086(a)(1)(G)) is the only one of the criteria that will be affected by the Project's changes. None of the other criteria VHB reviewed has the potential to be impacted. Details of proposed changes to VHB's review of the Wetland criterion are included below.

SECTION 248 NATURAL RESOURCES CRITERIA

WETLANDS (§ 6086(a)(1)(G))

EANL received a Vermont Individual Wetland Permit ("VIWP") that included authorization for this Project's impacts under VWR jurisdiction (DEC File# 2023-0380, issued April 1, 2025). As a result of the Project changes, VHB communicated with the Department of Environmental Conservation's ("DEC") District Wetland Ecologist who confirmed that EANL will need to submit for a *minor* amendment to the issued VIWP. Project changes to the POI will result in a reduction in the permanent impact under the Vermont Wetland Rules ("VWR") as follows:

- The approved interconnection route consisted of utility poles and overhead wires running from the POI to an existing pole tie-in, where it would then be buried. The majority of the interconnection route will now be installed underground by horizontal directional drilling ("HDD") running southwest from the intersection of Maple Street and the police station driveway toward the solar array. HDD is considered a Best Management Practice ("BMP") technique to avoid VWR impacts. Revised impact to accommodate the HDD will consist of a 24 square feet, 4-foot deep pit within Class II wetland buffer at the north end of the bore and will be captured in the VIWP minor amendment request, as shown on the revised plans in Attachment 1. The installation is

expected to be performed in one day and the hole will be backfilled and revegetated after the conduits are connected. Construction access to the boring pit may be achieved over native ground without excessive rutting or with the use of construction mats, which are considered an Allowed Use, as noted in Agency guidance for Section 6.22 *Best Management Practices for Installation of New Overhead Utility Lines*.

- The approved overhead line required four new utility poles in a new overhead line corridor within portions of wetland buffer, running along the west side of the police station driveway,. The revised HDD route requires two new utility poles in the wetland buffer, located in roadside locations at the southwest quadrant of the intersection of Maple Street, and the use of the HDD technique avoids any tree clearing in wetland or wetland buffer during installation or operation of the line.
- The POI changed from the existing pole, between the array and the southernmost existing utility pole outside of Class II area, to an existing pole at the southeast quadrant of the Maple Street/police station drive intersection to the existing pole in the northwest quadrant (opposite side of the Maple Street). This existing pole that will be the new POI is beyond VHB's limits of resource investigations; however, the existing pole will be replaced in-kind, which is considered an Allowed Use under Section 6.22 of the VWR and therefore will not require further wetland study or VWIP coverage.

Project modifications in Class II wetland buffer area will not begin until the VIWP has been reissued to authorize the revised impacts. The Project anticipates submitting the VIWP minor amendment request to the DEC in mid-May 2026. The Project changes will result in a reduction in impacts to impacts to wetlands which were already permitted and not undue and therefore do not raise a significant issue and will comply with the VWR.

Conclusion

Based on VHB's assessment of the proposed Project changes, with respect to the natural resources criteria assessed, VHB concludes that upon receipt of the VIWP amendment, The Project changes will have no undue adverse impact on Wetlands. The Project changes therefore have no potential to significantly impact any of the applicable 30 V.S.A. § 248(b)(5) natural resources criteria.

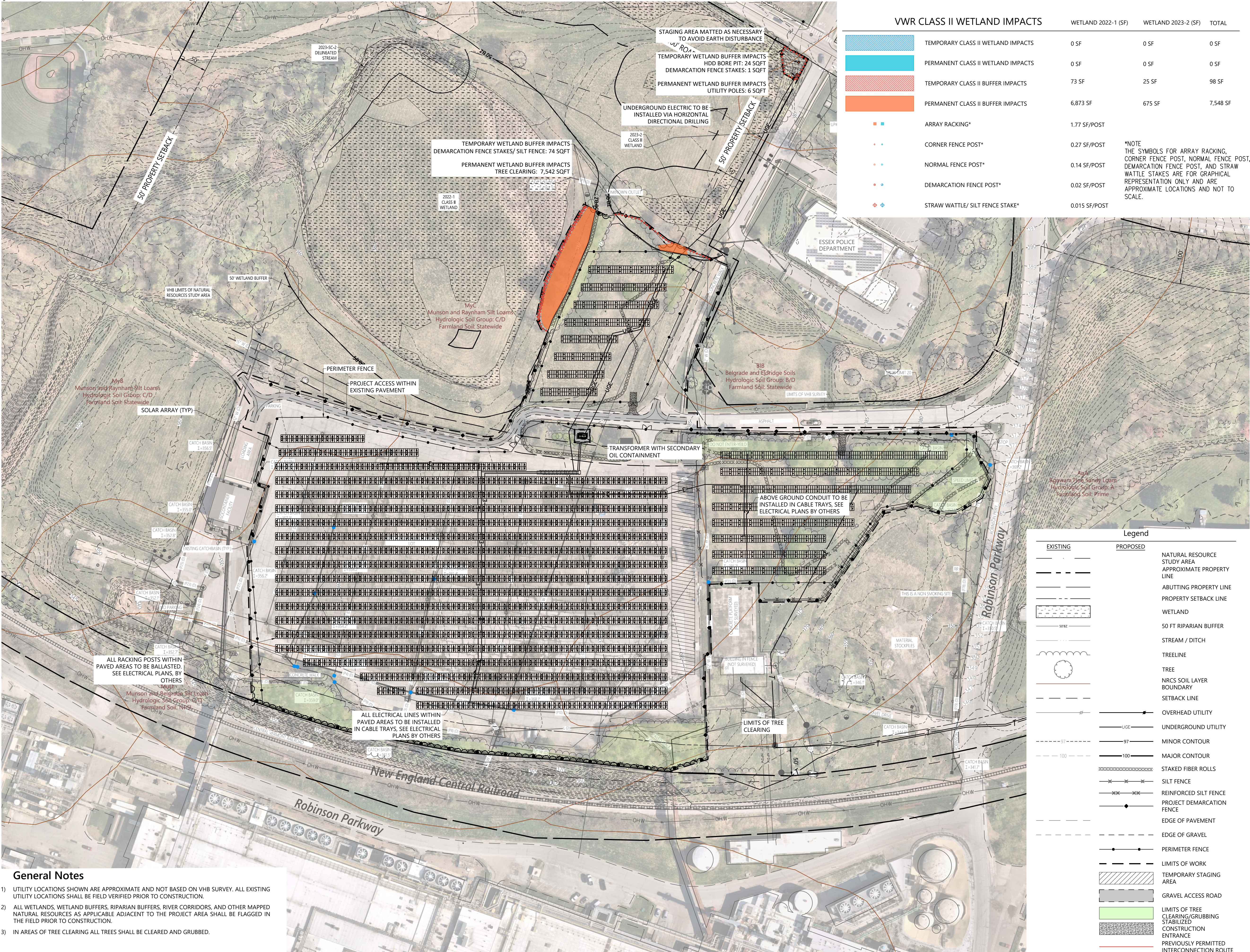
Attachments

1. Vermont Wetland Permit Impact Exhibit; Revised 5/7/2026

Attachment 1



20 Winooski Falls Way
Suite 400B
Winooski, VT 05404
802.497.6100



VWR CLASS II WETLAND IMPACTS		WETLAND 2022-1 (SF)	WETLAND 2023-2 (SF)	TOTAL
	TEMPORARY CLASS II WETLAND IMPACTS	0 SF	0 SF	0 SF
	PERMANENT CLASS II WETLAND IMPACTS	0 SF	0 SF	0 SF
	TEMPORARY CLASS II BUFFER IMPACTS	73 SF	25 SF	98 SF
	PERMANENT CLASS II BUFFER IMPACTS	6,873 SF	675 SF	7,548 SF
	ARRAY RACKING*	1.77 SF/POST		
	CORNER FENCE POST*	0.27 SF/POST		
	NORMAL FENCE POST*	0.14 SF/POST		
	DEMARCATION FENCE POST*	0.02 SF/POST		
	STRAW WATTLE/ SILT FENCE STAKE*	0.015 SF/POST		

*NOTE
THE SYMBOLS FOR ARRAY RACKING,
CORNER FENCE POST, NORMAL FENCE POST,
DEMARCATION FENCE POST, AND STRAW
WATTLE STAKES ARE FOR GRAPHICAL
REPRESENTATION ONLY AND ARE
APPROXIMATE LOCATIONS AND NOT TO
SCALE.

Legend	
	EXISTING
	PROPOSED
	NATURAL RESOURCE STUDY AREA
	APPROXIMATE PROPERTY LINE
	ABUTTING PROPERTY LINE
	PROPERTY SETBACK LINE
	WETLAND
	50 FT RIPARIAN BUFFER
	STREAM / DITCH
	TREELINE
	TREE
	NRCS SOIL LAYER BOUNDARY
	SETBACK LINE
	OVERHEAD UTILITY
	UNDERGROUND UTILITY
	MINOR CONTOUR
	MAJOR CONTOUR
	STAKED FIBER ROLLS
	SILT FENCE
	REINFORCED SILT FENCE
	PROJECT DEMARCATION FENCE
	EDGE OF PAVEMENT
	EDGE OF GRAVEL
	PERIMETER FENCE
	LIMITS OF WORK
	TEMPORARY STAGING AREA
	GRAVEL ACCESS ROAD
	LIMITS OF TREE CLEARING/GRUBBING
	STABILIZED CONSTRUCTION ENTRANCE
	PREVIOUSLY PERMITTED INTERCONNECTION ROUTE



Essex A North Lot Solar, LLC
1040 Robinson Pkwy
Essex Junction, VT

No.	Revision	Date	Appvd.

Designed by	PLU	Checked by	SMW
Issued for		Date	May 6, 2026

Permitting

Not Approved for Construction
Drawing Title
Wetland Impact Exhibit

Drawing Number

C0.00

Sheet 1 of 1

Project Number
58972.01

General Notes

- UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND NOT BASED ON VHB SURVEY. ALL EXISTING UTILITY LOCATIONS SHALL BE FIELD VERIFIED PRIOR TO CONSTRUCTION.
- ALL WETLANDS, WETLAND BUFFERS, RIPARIAN BUFFERS, RIVER CORRIDORS, AND OTHER MAPPED NATURAL RESOURCES AS APPLICABLE ADJACENT TO THE PROJECT AREA SHALL BE FLAGGED IN THE FIELD PRIOR TO CONSTRUCTION.
- IN AREAS OF TREE CLEARING ALL TREES SHALL BE CLEARED AND GRUBBED.