

VT Real Estate Holdings 1 LLC
58 Commerce Road
Stamford, CT 06902

March 6, 2023

By E-mail only

Mr. David Kiernan
Town Administrator
Town of Shaftsbury
PO Box 409
Shaftsbury, VT 05262

RE: VT Real Estate Holdings I LLC's Proposed 20 MW Solar Project in Shaftsbury, VT

Dear Mr. Kiernan,

As you are aware, VT Real Estate Holdings I LLC (to be referred to as "Shaftsbury Solar") sent a "45-day advance notice" letter on December 20, 2022 to the Town for its proposed 20 megawatt (MW) solar project ("the Project"), to be sited on two parcels of land adjacent to Holy Smoke Road and US Route 7 in Shaftsbury. We also participated in a town public meeting regarding our project on February 8, 2023. The meeting was well attended and several topics and concerns were raised at that meeting and in subsequent public comments to the Vermont Public Utility Commission ("PUC"). As several of the concerns raised are based on inaccurate or incomplete information, we thought it best to provide the Town with additional details about the Project in advance of your Town Meeting later today. Our forthcoming Section 248 petition, to be filed with the PUC, will address all relevant issues with supporting prefiled testimony and exhibits from Shaftsbury Solar and its expert consultants.

- **Project Location and Visibility** – The Shaftsbury Solar site was selected due to the natural screening provided by its largely forested borders; in addition, we are connecting to the high voltage transmission line on site, eliminating the need for additional land impacts. After reviewing the limited areas with potential visibility of the Project along Route 7 and Holy Smoke Road, we have developed a comprehensive landscape mitigation plan that augments the existing vegetation. Visual renderings will be provided as part of our petition to the PUC.
- **Property Tax Revenue to Shaftsbury and the State** – Vermont law requires solar project owners to contribute to the state education fund at a set rate (\$4,000/MW), and thus our contribution will be \$80,000 per year. As for municipal property taxes, we will pay property taxes to the Town in excess of \$100,000 per year, over and above the real estate taxes for the land itself. This figure was based on Vermont's required method for assessing solar projects, as applied to the Town's current tax rate.
- **Protection of Town Infrastructure** – We are working with the North Bennington Water District and have revised our site plan to relocate the existing 100 year old (+/-) waterline that is located on the site in order to ensure its protection and continuous access for future maintenance. We are continuing to work with the Vermont Agency of Transportation to seek approval for a temporary

construction access drive to the site directly to US Route 7. Regardless of the route, Shaftsbury Solar will repair road damage to local roads, should any occur, due to Project-related construction traffic.

- **Customers for Solar Energy** – The section 248 CPG process involves significant review of the Project by the PUC and other state agencies and parties, which may lead to design changes. Shaftsbury Solar has and will continue to actively seek wholesale customers for the power, particularly after the Project’s design is set. Regardless of who our ultimate customers are, local residents and all Vermonters will benefit by the Project’s renewable and carbon-free energy displacing fossil fuel generation on the power grid. The Agency for Natural Resources has also recently filed new regulations promoting the adoption of electric cars and trucks. New clean energy projects will be necessary to ensure that electric vehicle power is truly clean and emissions free.
- **Protection of Agricultural Soils** – Our site development plan will meet or exceed all state requirements for the protection of prime agricultural soils. There will be minimal grading to the Project site and all disturbed topsoil will be appropriately stored per AAFM’s guidelines. The Project will utilize native ground covers and will incorporate pollinator friendly ground covers where practical. We also are beginning outreach to local beekeepers and sheep farmers to gauge their interest in a cooperative use of portions of the Project site.
- **Protection of Wildlife and Natural Resources** –Extensive field studies have been completed for the Project to ensure that no critical wildlife habitat will be disturbed. The Project will utilize perimeter fencing that allows smaller animals access through the site. We will also have a 50 foot wide corridor near the center of the Project that connects forests on the east and west ends of the property, which will support additional wildlife connectivity. We will follow all state regulations to ensure impacts to wildlife are minimized.
- **Groundwater Protection, Weather Considerations** – Our solar modules will be Tier I crystalline silicon based, the same technology used throughout Vermont and nationally without any observation of groundwater impacts. These modules are encapsulated with high strength glass and/or plastics to ensure long life, anticipated to be a minimum of thirty years of production. Solar racking systems have been designed to withstand wind gusts of up to 150 miles per hour, and our Project will be designed with equipment to meet all local weather conditions.
- **Stormwater and Erosion Controls** – The Project is being designed to minimize grading and soil disturbance. Additionally, Project construction will be performed in accordance with an ANR Individual Construction Stormwater Discharge Permit, which will include requirements for erosion prevention and sediment control using proven Best Management Practices, revegetation, monitoring, and reporting. A second stormwater permit, referred to as an ANR Operational Phase Stormwater Permit, will regulate stormwater runoff from the access roads and concrete equipment pads once the Project is operational. This permit is based on a Project design to meet the “unified sizing criteria” which will address all concerns regarding the quantity and quality of runoff (including water temperature considerations), to ensure that the Vermont Water Quality Standards are met in all receiving waters.

Undoubtedly there will be additional topics that the Town Selectboard may wish us to address, and we want to work with you to identify each of those topics. We are looking forward to participating in a second public meeting to cover these and other topics in more detail. Shaftsbury Solar team is available for such a meeting within the next three to four weeks. In the meantime, we invite you to contact us with any questions or comments at the contact information below, as we welcome your input and suggestions to make this a successful project.

Sincerely,



Peter Ford
Vermont Real Estate Holdings I LLC
(aka "Shaftsbury Solar")
Email: info@freepointsolar.com

cc: Bill Colvin, Callie Fishburn, BCRC