SPECIAL USE PERMIT
APPLICATION NARRATIVE

ROUND HILL SOLAR PROJECT
GUTHRIE ROAD
AUGUSTA COUNTY, VIRGINIA

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JULY 2020
REVISED NOVEMBER 2020

KHA #116766007

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I. EXECUTIVE SUMMARY

Round Hill Solar, LLC, ("Round Hill" or the "Applicant") seeks the issuance of a Special Use Permit and a determination pursuant to 15.2-2232 for an 83 MW utility-scale solar facility (the Round Hill Solar Project or "Project"). Round Hill Solar LLC is a wholly owned subsidiary of Strata Solar, an experienced developer, constructor, owner and operator of utility-scale solar facilities, which has built and operates several similar projects in Virginia already under contract to Dominion Energy.

The Project site is located in south-central Augusta County approximately 1.5 miles north of Stuarts Draft. The project is to be located on an 880-acre tract of land comprised of eleven contiguous parcels, all zoned GA. The site is currently actively farmed, and the surrounding area is rural with primarily agricultural use and few immediate neighbors.

Approximately 560 acres of the total 880-acre site will be developed with solar photovoltaic (PV) panels mounted on single-axis trackers. The remaining unused site areas consist of small woodlots, stream or wetland areas, areas of unsuitable topography, and setbacks and vegetative buffer areas. The Project will interconnect to Dominion Energy's Waynesboro-Dooms 115kV transmission line which bisects the site via a small project substation and interconnection switchyard to be constructed in the center of the site adjacent to the transmission line. Ancillary project facilities will include inverters and stormwater management facilities. A high-quality grass/clover groundcover will be maintained across the site to minimize erosion, and native pollinator species will be planted in some setback areas. All panels areas will be encircled with chain link security fencing. Setbacks of 50-200' or more are proposed from adjacent property lines to panel arrays to be sensitive to neighboring properties. Significant new vegetative buffers will be planted within these setback areas around the perimeter of the project to screen the panel areas and reduce visual impact.

The Project represents an approximately $100 million investment in Augusta County and will bring a number of fiscal, economic, employment, environmental, and energy policy benefits to Augusta County and Virginia. Per the Economic and Fiscal Contribution Study in Attachment H, the benefits include:

- Revenue Share payments to Augusta County of $116,000 annually, totaling $4.1 million in cumulative county revenue over 35 years;
- One-time payment of $1 million to Augusta County at commercial operations pursuant to a proposed Siting Agreement;

- Additional real property tax potential estimated at $32,000 annually, totaling $1.3 million over the life of the Project;
- 400 Construction jobs and 8-10 permanent jobs;
- Economic stimulus to the area estimated at $30.1 million during construction and $704,000 annually during operations;
- Low cost clean, reliable, renewable energy for Virginia customers;
- Contribution to meet Dominion's and Virginia's renewable energy goals; and,
- Environmental benefits in reduced CO2 and other emissions.

Round Hill has designed the project and crafted this application to be consistent with the Augusta County Code Chapter 25, Division A, Article VI.D. Solar Energy Systems (the "Solar Ordinance"). The Project is compliant with the Solar Ordinance as demonstrated by the SUP Concept Site Plan, project design, and this application. Additionally, the proposed development is substantially in accord with the County's Comprehensive Plan or part thereof, as is detailed in the text of this narrative, which has been updated to reflect the County's changes to the Comprehensive Plan since the initial application submittal. The Applicant has proposed a number of conditions of approval to ensure compliance with the ordinance and ongoing responsible operations and maintenance. Key to those conditions is a proposed Decommissioning Plan (Attachment F) to ensure that at the end of the project life the facility will be decommissioned. All project components will be removed from the site and the site returned to agricultural use. Financial security is also proposed to backstop those decommissioning plans.

Solar energy is clean and efficient, and a properly sited solar facility such as Round Hill can be a safe, quiet and unobtrusive neighbor. Solar development brings significant benefits to the County, especially considering new legislation passed by the 2020 Session of the General Assembly which provides for the revenue share enabling legislation and siting agreement enabling legislation and the resulting fiscal benefits highlighted above. The Round Hill Project can also be Augusta County's contribution toward advancing the Commonwealth's newly revised Energy Policy and Plan. The Round Hill Project represents a new utility-scale solar industry in Augusta which can complement Augusta's agriculture and timber industries, diversify incomes for landowners and revenues for the County, and become an overall positive force in a community.

II. PROJECT DESCRIPTION

A. Proposed Use

This Application for a Special Use Permit is submitted to Augusta County pursuant to Article 25 VI.D Solar Energy Systems of the County Code to construct and operate the 83 MW Round Hill Solar Project ("Project").

Attachment A is a copy of the completed Special Use Permit Application Form for the Project.

B. The Applicant

The Project is being developed by and the applicant is Round Hill Solar, LLC ("Round Hill"), a wholly owned subsidiary of Strata Solar ("Strata"). Strata Solar is a leading developer, builder, owner, and operator of utility-scale solar PV facilities. Strata has extensive experience in Virginia, and has developed several projects, built and is operating seven projects representing 267 MW of PV capacity, and is currently constructing five projects totaling 362 MW in Virginia. More information on Strata Solar can be found at www.stratasolar.com or in Attachment B.

C. Project Location and Site Description

The Project is situated in the Riverheads District in south-central Augusta County. It is located approximately one and one-half (1½) miles north of Stuarts Draft and two (2) miles southeast of the intersection of Interstate 81 (I-81) and White Hill Road (SR 654), as shown on Figure 1. The project area is roughly located east of White Hill Road (SR 654), west of Tinkling Spring Road (SR 608), and south of Christians Creek Road (SR 648). Guthrie Road (SR 652) bisects the site.

The site is comprised of eleven parcels totaling approximately 880 acres currently under long-term lease by Round Hill Solar LLC. All parcels are all zoned General Agricultural (GA), and are largely utilized as agricultural land, either actively farmed or used as pasture. Land use in the vicinity is also predominately agricultural and some rural residential. See Attachment C – Tax Parcel Maps, for parcel information.

Figure 1 - Site Location Map

D. Site Selection

The Round Hill Project site is an excellent utility-scale solar project site. Round Hill selected it based on multiple considerations typical in siting such facilities, including:

<u>Proximity to Transmission with Capacity</u> – Dominion's Waynesboro-Dooms 115kV transmission line bisects the site. No new transmission line to connect the Project is required, and the Project's substation and interconnection switchyard can be constructed in an internal area of the site. Round Hill has applied for interconnection to that line via the grid operator, PJM Interconnection LLC, and has completed studies to confirm there is adequate transmission capacity on the line for a viable project. A sample plan and profile of a project substation and switchyard is included as Attachment V.

Suitable Topography – The site will readily accommodate the Project since it includes enough relatively flat or gently rolling and dry land to host an 83 MW project. The site's predominant topography – with less than 7% slopes – will also enable the Applicant to minimize the amount of mass grading required during the construction phase.

Avoidance of Sensitive Environmental Areas – The majority of the site to be used for the facility has been actively and intensively farmed for decades. The Applicant has already mapped wetlands and flood zones, and the site contains relatively few such areas. The Applicant will in any event avoid such areas in its development plan, with suitable setbacks and buffers.

Large, Rural, Well-Buffered Site – The relatively large 880-acre site allows for reasonable setbacks and significant vegetative buffers to help break up offsite visibility. The project site itself is in a rural area with few residences in proximity. It has no road frontage directly on Tinkling Springs Road, and limited road frontage on White Hill and Churchmans Mill Roads. Guthrie Road, which bisects the site, is a limited-use gravel state road.

Round Hill also selected the site following guidance provided in the Zoning Ordinance. These specific considerations include:

GA Zoning – The Project is located in an GA General Agricultural District, in which solar projects are permitted subject to a special use permit.

Not Located on Industrial Land – The site is located on a tract historically used for agriculture, is not in the General Industrial zoning district, and is not located in areas planned for future commercial nor industrial use.

No Impact to Airport – The Project site is 4.75 air miles west of the Eagles Nest Airport and over 15 miles southwest of the Shenandoah Valley Regional Airport and is expected to have insignificant impact to the airports' operations as described further in Section IV 25-70.6.

E. Project Components

The Round Hill Project will include the following key components:

- Rows of photovoltaic (PV) panels mounted on posts principally driven into the ground. Rows of panels are typically spaced 15-25 feet apart. The posts are placed individually in an effort to minimize the amount of on-site grading. These solar arrays may be either fixed on racks running east to west or mounted on racks running north to south that track the movement of the sun. Round Hill anticipates that it will use tracking arrays, and final technology used will be determined prior to site plan submittal. Like most technology, equipment improves continuously, and markets fluctuate, so the specific

manufacturer and models of equipment will not be known until the end of the engineering process. Figure 2 shows a typical single-axis tracker system like what would be installed on this site.

Figure 2 – Typical Single-Axis Tracker System

- Inverters and transformers within typically pad-mounted modular metal cabinets, which convert electricity from DC to AC and increases its voltage.

- Electrical collection and communications lines either mounted on the racking, buried in conduits, or located on overhead utility poles at sensitive stream or wetland crossings.

- A project substation located in the north-central portion of the site, adjacent to the interconnection switchyard, which includes breakers, main step-up transformer, bus work, and metering. A sample plan and profile of a project substation is included in Attachment V.

- Communications and facility control systems and equipment.

- An interconnection switchyard adjacent to the project substation and which interconnects the Project to Dominion's 115kV transmission line which bisects the site. A sample plan and profile of a project switchyard is included in Attachment V.

- Unpaved onsite access roads, grassy driving aisles, and gravel entrances from public roads.

- Chain-link security fencing located around the perimeter of the solar arrays and developed site areas.

- Stormwater and erosion and sedimentation control features and basins.

- Several storage containers placed on a gravel lot for spare parts and materials. The Project may also utilize existing residential structures and agricultural out-buildings onsite as office space and to store equipment and supplies.

A SUP Concept Site Plan showing the proposed Project layout is provided as Attachment E. The developed Project footprint (PV panel and equipment areas within the fence line) is approximately 560 acres of the total 880-acre site. All disturbed and developed areas will be planted and maintained with grass to stabilize the site and prevent erosion. The remaining site area includes unused land comprised of topographically unsuitable land, irregularly shaped and thus unusable site areas, setbacks and buffer areas, streams, wetlands and their related buffer areas.

F. Setbacks and Screening

1. Setbacks

The proposed SUP Concept Site Plan provided as Attachment E incorporates different proposed setbacks from the projects' property line or edge of road right-of-way to the Project fence line, depending upon the adjacent land use. Generally, three different setbacks are proposed and noted on the plan as follows:

1. 50' Setback: Proposed in areas bordered by agricultural fields and adjacent to lightly traveled roads;
2. 100' Setback: Proposed in areas bordered by large rural residential lots or adjacent to more highly-traveled roads;
3. 200'+ Setback: Proposed in areas adjacent to rural residential areas. In several of these areas setbacks of over 500' are proposed.

This approach is consistent with 25-70.6 E. which specifies a 200' setback *"unless the Board of Supervisors is satisfied that different setbacks are adequate to protect neighboring properties."* Given the adjacent agricultural use around much of the site, low residential densities on several

neighboring properties, and low traffic volumes on Guthrie and Churchmans Mill Roads, these proposed setbacks are considered adequate for the project. The proposed setbacks likewise will reduce impacts to adjacent properties and any future development along Tinkling Springs Road. All areas will include existing or proposed vegetative screening within the setback, regardless of setback depth, as further described below.

Note that no solar facilities will be located within these setback areas, with the exception of areas where underground electrical cabling may cross existing road rights-of way within the project area. Vegetative buffers and some stormwater and erosion and sediment control facilities will be located within certain setback areas.

2. Buffering

The Applicant proposes a combination of preserving existing vegetation and installing newly planted vegetative buffers within the setback areas to help screen the project and minimize visual impacts. A plan of where these existing and proposed vegetative buffers are to be located is provided in the Landscape Buffer Illustrative Exhibit as Attachment D. Existing wood lines and woodlots will be preserved in areas as shown on the Landscape Buffer Illustrative Exhibit t to better shield views of the site from surrounding areas.

In areas where existing vegetation does not exist, or exists but does not provide adequate buffering, the Applicant proposes three types of vegetative buffers for installation along the perimeter of the site. These types incorporate a mix of plant material and knowledge of the growth pattern and spacing requirement of tree species. The three types are summarized as follows:

- Type A – 30’ wide buffer of a continuous mixed evergreen screen;
- Type B – 35’ wide buffer of mixed evergreen and ornamental tree screen; and,
- Type C – 50’ wide buffer of a mixed evergreen and ornamental tree screen with shrub plant material.

In addition to the buffer materials and widths mentioned above, a 10’ wide strip of native grasses and wildflowers will be planted adjacent to newly planted buffers to provide native pollinator habitat around the project and a diversity of plant material within the setbacks. These areas are proposed adjacent to all buffer types planted within the Project. The Applicant proposes to complete the Virginia Pollinator-Smart/Bird Habitat Scorecard Version 2.0a and plans to achieve 80 points, Certified VA Pollinator-Smart status. After submittal of the Scorecard, the Applicant will follow subsequent submittal criteria, submit a long-term

management plan, and plans to achieve lifetime pollinator-friendly status in year 10 of the Project life per the Scorecard.

Type A buffers (30' wide) are proposed along the majority of the property lines where adjacent uses are agricultural land, residential land greater than 200 feet from the project area, and where distances from Tinkling Spring Road to the Project area further restricts views of the site from public right-of-way. These buffers are intended to provide some break-up of the viewshed in areas where denser or more varied plantings types would be less effective.

The Applicant placed these buffers in the southeastern portion of the property considering both site topography and existing vegetation to maximize the impact of these planted buffers. The cross-section view contained in Attachment D from Tinkling Spring Road shows the existing natural vegetation and topographic pattern that significantly breaks up the view of the project and blocks most of the site, independent of the planted buffer proposed.

Type B (35' wide) buffers are proposed for Guthrie Road, along the interior property lines and where the project borders adjacent landowners to the north along Guthrie Road. Type B buffers are also proposed along Churchmans Mill Road to break up the viewshed from the public right-of-way. The substation and switchyard areas, located on the interior of the Project more than 950 feet from Guthrie Road, will also be screened on three sides with Type B buffer sections. The intent of this buffer is to provide screening of the project along lower-trafficked public rights-of-way with a natural mix of evergreen and ornamental vegetation.

Type C buffers (50' wide) are proposed along White Hill Road to shield views of passing vehicular traffic and some properties to the south. The proposed combination of plant material achieves a natural aesthetic mix while providing maximum screening of the Project area along adjacent high-trafficked right-of-way or residential properties.

The Applicant proposes that the composition and placement of each buffer type satisfies the intent of the Zoning Ordinance to achieve the maximum level of protection. Each type provides appropriately placed screening and plant species to best shield adjacent properties from views of the Project, taking into account the existing vegetation, topographic factors, and neighboring properties and land uses. See the Landscape Buffer Illustrative Exhibit package, provided as Attachment D, for buffer details and renderings of typical elevation views and line-of-sight profiles at key points throughout the Project site. See also Section IV of the Project Narrative below for a discussion of visual impact mitigation and Section V for demonstration of compliance with the Zoning Ordinance for these proposed buffers.

G. Development Phases

The four major life cycle phases of the Project are (1) development, (2) engineering, procurement and construction (EPC), (3) operation, and (4) decommissioning.

The Round Hill Project has been in the development phase for approximately two years, and this phase is expected to be completed in late 2021. The development phase includes land site identification, land leasing interconnection application and studies, engineering and environmental studies, permitting, and commercial efforts toward a power purchase agreement. Multiple due diligence studies are performed during development, including environmental and geotechnical studies, boundary and topographic surveys, preliminary engineering, title research, and archeological/cultural/historic resource evaluation. Key permits include County special use permit and the Virginia Permit by Rule (PBR), 9VAC15-60-10, et seq. – administered by the Virginia Department of Environmental Quality. The PBR is a comprehensive clearing-house process that requires documentation of all required state and local permits. Land use approvals are an essential part of development due diligence and are required for the final development permit – the Virginia Permit by Rule.

Engineering, procurement, and construction begins only after completion of all development work described above. The development schedule anticipates that civil site work would begin in late 2021 or the first quarter of 2022. Construction would begin immediately thereafter and be completed within the fourth quarter of 2022. Operations would commence at the beginning of 2023 and decommissioning would occur at the end of the project's life.

H. Operations and Maintenance

The Project is expected to operate for approximately 35 years. The power generated from the solar farm would be connected to the power grid for use by consumers. Although those consumers could be anywhere in the PJM region, it is highly likely output of the facility will be utilized by utility customers in the region and within Virginia. All consumers benefit from the availability of clean energy and the replacement of fossil fuels, and that clean energy is needed to meet the goals of the Virginia Energy Plan described below.

The Project will be monitored from a network operations center in Strata's Durham, North Carolina, headquarters, pictured below in Figure 3. This is a secure, regulated facility from which the Applicant operates the solar energy equivalent of three large conventional power plants.

In addition to construction jobs, the Project will permanently employ 8 to 10 full-time grounds maintenance personnel and electrical and mechanical technicians to service equipment during

operations. The Applicant will also either (a) utilize existing residential structures on-site as office space and agricultural out-buildings to store equipment and supplies, or (b) require an offsite local maintenance facility building to store equipment and supplies.

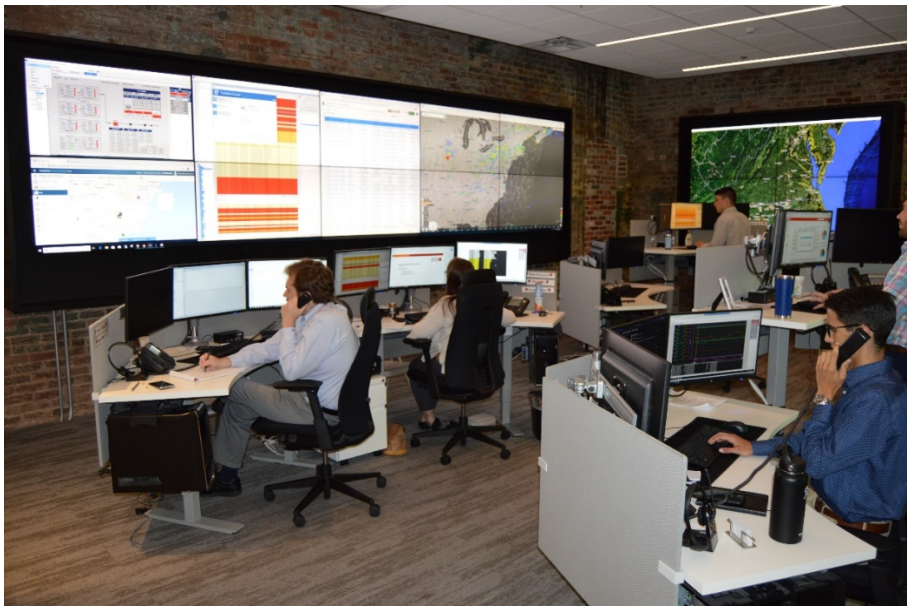

Figure 3 – Strata Network Operations Center in Durham, NC

I. Decommissioning

When the Project has served its useful life, it is disconnected from the grid, decommissioning is performed, and the site is restored to its pre-construction agricultural use or some other use. All materials would be removed from the site, recycled, or re-used. The solar modules, for instance, are warrantied to operate at over 70% of original energy output in 30 years. The panels are the single biggest cost in a solar farm, so it is anticipated that there will be a market for the still-viable equipment at a fraction of new cost. All metal components are recyclable.

Consistently with the requirements of Va. Code § 15.2-2241.2 and the County Code 25-70.8 Decommissioning and 25-70.9 Bonding, Round Hill has proposed a Preliminary Decommissioning Plan as Attachment F and preliminary decommissioning estimate that is provided as Attachment G. The plan includes a decommissioning bond or security with the County to ensure that there are enough funds to remove all the site components whenever the facility ceases operations, at no cost to the public or landowners. All facilities will be removed per the plan, except for the interconnection switchyard, which will become a permanent part of Dominion's transmission infrastructure in the area. The cost estimate includes a preliminary opinion of probable cost for decommissioning, which excludes salvage values. Both the Preliminary Decommissioning Plan and Preliminary Decommissioning Estimate will be updated

and resubmitted to the County at the time of site plan submittal, once the Facility's final design details are known.

III. PROJECT BENEFITS

The Project will bring a number of fiscal, economic, employment, environmental, and energy policy benefits to Augusta County and Virginia. A full economic impact study for the Project was completed by Mangum Economics and is provided as Attachment H. Below is a summary of the multiple benefits the Project will provide.

A. Revenue Share/Taxes

The new Virginia statute permits a locality to replace the tax on machinery and tools for solar projects with a "revenue share" approach. The statute provides for up to $1,400 per MW per year payment to the County in lieu of the conventional tax on equipment, which on average nearly doubles payments to the County over the life of the Project. Because Round Hill supports the adoption of a revenue share ordinance at the maximum allowable rate, this will result in a flat revenue share payment to the County of $1,400 x 83 MW = $116,200 per year. There is no depreciation, so that amount will remain level for the life of the project, totaling more than $4,067,000 over 35 years. The revenue share also has no effect on the County's Composite Index, so it creates no risk of lowering school funding as does the conventional machinery and tools tax approach.

B. Siting Agreement

Another new Virginia state statute allows solar project developers to enter into a siting agreement with the County to fund capital improvement projects, including, but not limited to the development of broadband. The siting agreement proposed by Round Hill in conjunction with the Project will include a substantial lump sum payment of $1,000,000 to Augusta County at the time commercial operations of the Project commence. A Notice of Intent to Enter a Siting Agreement and draft siting agreement have been provided to the County in conjunction with this application.

C. Land Reassessment

Currently, tax payments to Augusta from the land upon which the Project is located are approximately $4,500 per year. Augusta County will reassess the parcels once a solar facility is constructed. Round Hill estimates that this could increase property tax payments to Augusta County by approximately $35,000 per year, depending on the assessed valuation as determined by the Assessor and the Commissioner of the Revenue. There would be some additional revenue from the one-time 5-year roll-back tax that would have to be paid when properties are removed from the Land Use program. This increase in tax payments would yield approximately $1,320,000 over the life of the project.

D. Job Creation

Solar energy is a growth industry in Virginia as elsewhere. As further described below, the Virginia Energy Policy and Plan and Dominion Energy's long-range plan include development of many thousands of MW of renewable energy. That demand will create thousands of good jobs in Virginia across a broad spectrum of professional, technical, construction, operations, and maintenance employment. Local engineering, construction trades, maintenance, and supply businesses will be needed as well. Strata has helped to launch the SHINE program (https://www.shine.energy/about) to develop a qualified solar workforce and provide a pathway for Virginians to build sustainable solar careers, and will encourage local institutions such as Blue Ridge Community College to participate.

The Applicant estimates approximately 400 construction jobs will be created due to construction of the project. Many construction employees will be retained for other Strata projects and have opportunities for future promotion. In addition to construction period jobs, the Project will permanently employ eight (8) to ten (10) full-time maintenance personnel including groundskeepers and electrical and mechanical technicians during operations.

While in times past the local employment statistics have indicated a very low level of unemployment in Augusta County and Town, recent job losses caused by COVID-19 and the steps that have been necessary to address its impact, may mean that there are those locally who would benefit from the employment opportunities that will become available with a major solar project.

E. Local and Regional Economic Benefits

The Round Hill Project represents a capital investment of over $100 million in Augusta County. In addition to direct payments to Augusta County, additional economic benefits will accrue to Augusta and the region from this investment, as estimated by the Mangum Economic Report provided as Attachment H.

Construction and operation of the Project will generate labor income, economic development for regional businesses, including engineering and construction, consulting, landscaping, and hospitality firms. This "ripple" economic effect in Augusta County is estimated at over $30,000,000 expended during construction and over $700,000 annually during operations.

The Project will also be a source of state and local sales tax for in the County and statewide in Virginia, direct and indirect, during construction, plus additional sales tax revenues during operations, estimated at over $800,000 during construction.

Finally, the project will generate substantial revenue for landowners who are participating in the project through the lease of their land.

F. The Commonwealth's Energy Policy, Energy Plan, and Environmental Benefits

Virginia has had an Energy Policy and Plan since 2006. At the 2020 Session of the General Assembly, however, the legislature made dramatic changes to the relevant statutes that cannot go without notice.

The General Assembly has now established an aggressive objective of the Commonwealth to establish enough supply and delivery infrastructure to enable "widespread deployment of distributed energy resources [solar and wind energy producers] and to maintain reliable energy availability[.]" Va. Code Ann. § 67-101 (6). Even more dramatically, it has set a significantly enhanced goal of reaching net-zero greenhouse gas emissions by 2045, across the electric power, transportation, industrial, agricultural, building, and infrastructure sectors. To this end, it is requiring the development of energy resources sufficient to produce 30% of Virginia's electricity from renewable sources by 2030. By 2040, 100% is to be from carbon free sources. Va. Code ann. § 67-101 (10), (12). Among other things, the State Corporation Commission, DEQ, and the Clean Energy Advisory Board, among others, are charged with "an assessment of state and local impediments to the expanded use of distributed resources [wind and solar] and recommendations to reduce or eliminate these impediments."

It also amended Va. Code Ann. § 56-585.1(g)(6) to instruct the State Corporation Commission that whereas before July 2020 the purchasing or leasing for a new utility-owned or -operated generation facility or facilities producing 5,000 megawatts of solar or wind power was required to be deemed in the public interest, after July 1, 2020, it must include the construction of such facilities as well, and in the staggering amount of 16,100 megawatts. Dominion Power is to have completely achieved net-zero carbon dioxide and methane emissions from its power generation and gas infrastructure operations by 2050, and on May 1, 2020, it filed its new Long-Term Integrated Resource Plan with the State Corporation Commission to begin implement these goals.[1]

The Commonwealth is thus now profoundly committed to a clean energy future, and Round Hill wishes to be a part of that future in Augusta County, and in doing so bring a myriad of benefits to Augusta County. Once operational, the Project will produce enough clean efficient reliable

[1] https://bit.ly/3epSLfY; SCC Case No. PUR-2020-00035.

renewable power for up to 14,000 Virginia homes in the region. Additionally, the renewable energy produced will offset annual carbon dioxide emissions approximately equivalent to removing 42,000 cars from Virginia highways, 1,100 railcars of coal, or 440 million pounds of carbon emissions as compared to conventional electricity sources. (Source: Greenhouse Gas Equivalencies Calculator, US EPA https://bit.ly/2CUYIU1.)

G. Community Benefits

Other beneficial aspects of the Project for the community include:

- The Project bring significant revenue share, tax, and siting agreement revenues and stimulates economic development in the County with minimal requirements for Augusta County facilities or services. In the past this has meant a modest increase in real estate tax and machinery and tools tax revenues, but with changes in the law discussed above, those benefits have increased significantly.

- Although the site will be developed as a solar facility, the Project offers a kind of long-term open land preservation strategy for the County. Over the 35-year project life continued development pressure in the area most certainly would otherwise result in portions of the site being developed into housing stock. Given the project's development this will not happen, and the site can be returned to agricultural use after decommissioning.

- The Project will implement criteria to achieve lifetime pollinator-friendly status per the Virginia Pollinator-Smart/Bird Habitat Scorecard Version 2.0a, to include planting of diverse native seed mix, approval of a vegetation management plan, monitoring of vegetation, mapping and control of invasive species, and including publicly accessible signage of habitat.

- Finally, Round Hill will continue to educate the public about solar energy and will work cooperatively with schools and other organizations in this manner, helping Augusta and its citizens to be part of Virginia's clean energy future.

IV. POTENTIAL IMPACTS AND MITIGATION

A. Construction

1. Erosion and Sedimentation Control

The Augusta County Code regulates Erosion and Sedimentation Control and operates as an adjunct to the Zoning Ordinance. It incorporates by reference the regulatory requirements promulgated by the Commonwealth and found in the Virginia Administrative Code at 9VAC25-840 et seq., the Erosion and Sediment Control Regulations. These requirements apply to any land disturbing activity in which Round Hill will engage. Erosion and Sediment Control measures will generally consist of silt fence, diversion berms and sediment basins which will be designed as part of the overall grading and phasing plan during the design phase of the project. These measures consider slope, existing drainage areas, and the establishment of permanent vegetation prior to removal of protective devices. The sequence of construction for a solar facility like Round Hill Solar naturally results in more distributed and less intense land disturbance than a large shopping center or industrial project. The natural topography is left intact where possible, requiring only limited land disturbance activities like pile driving, wiring, and module installation. Where grading is required, each drainage area is typically protected by a sediment trap or basin, brought online individually and stabilized for close out individually. Such measures limit erosion onsite and mitigate water quality sedimentation impacts.

2. Traffic

There will be substantial construction traffic for approximately 12 months during the initial construction of the project. Round Hill will route truck traffic hauling material and equipment deliveries from I-81 via White Hill Road, thus minimizing such construction traffic in Stuarts Draft. Once operational, long-term traffic is projected to be very low. Refer to the Traffic Management Plan in Attachment I for more information.

3. Noise

Like any construction site, noise will be generated intermittently during the construction period. Utility scale solar construction will consist of driving small steel pile supports into the ground which produces repetitive metallic impact noises for a short period of time. Other noise will consist of heavy equipment and trucks hauling materials to the site and grading activities. Because of the rural nature of this project site, the resultant sound levels are not expected to be unreasonably high or long-lasting in duration.

Solar projects are very quiet neighbors during operations. Panels create no noise and the only noise created are from the inverters which are generally positioned in the middle of the arrays

and well away from property lines. Due to the low level of noise produced, distance from property lines, and vegetative buffering, inverter noise will be inaudible offsite.

Refer to Attachment J for further information on project noise and mitigation.

B. Operations

1. Health and Safety

Solar farms do not endanger public health or safety. The facility will be designed and built to all applicable electrical, construction, and environmental codes and regulations. Security fencing will be provided around all equipment to prevent unauthorized entry.

Such facilities do not generate significant EMF, nor do they interfere with telecommunications. All equipment must comply with FCC rules to limit any radio frequency power that is emitted by electronic devices.

Solar projects to not contain hazardous materials which are leachable and pose no threat of soil, groundwater, nor surface water contamination. The facility will not produce any emissions.

No glare will impact the airports in the region. Solar panels are designed to absorb light and not reflect it.[2]

The North Carolina State University has published *Health and Safety Impacts of Solar Photovoltaics* which details the negligible health and safety impacts of utility-scale solar facilities and is provided as Attachment K.

2. Visual Impact

Buffering is a key component of the Round Hill Project design. A combination of existing topography and vegetation to remain, along with several types of planted buffers, is proposed as described above in Section II and serves to mitigate and break up potential visual impact of the Project.

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[2] FAA, "Technical Guidance for Evaluating Selected Solar Technologies on Airports" (November 2010), p. 8. Airports increasingly are interested in on-site solar panels. The 17 MW solar project at the end of the runways of the Indianapolis International Airport is thought to be the world's largest at an airport. http://www.indsolarfarm.com/.

Much of northern boundary of site is comprised of existing woodlots and wooded areas along drainage features which will remain, and which, combined with topography, completely screens the project from offsite views from the north.

The significant setbacks provided on the east side of the project near Tinkling Spring Road, combined with existing tree lines there and new vegetative buffers, will provide significant viewshed protection, particularly near-field. The cross-section view contained in Attachment D from Tinkling Spring Road shows the existing natural vegetation and topographic pattern that significantly breaks up the view of the project and knoll that blocks most of the site, independent of the planted buffer proposed.

Setbacks of 50' combined with buffer placement immediately adjacent to Guthrie Road will produce significant mitigation of both nearfield and far views. While at the time of planting buffers will break-up nearfield view, once mature these buffers will provide significant viewshed screening and protection. Buffer types and placement along Guthrie have been proposed according to input from the adjacent landowners.

Along White Hill Road, the wider buffer provided will largely screen the facility from views of passing motorists. Setbacks of 200-800' are provided from nearby rural residential properties in this area to minimize near-filed visual impacts. At higher elevations here, some far-field views will remain, although such viewshed will be broken up significantly by topography, existing vegetation, and the new vegetative buffers proposed.

3. Stormwater Management

The proposed site design will protect against soil erosion and sedimentation, as all such facilities must develop erosion and sediment control and stormwater management plans that satisfy applicable state and County requirements during the site plan process. Following construction, temporary basins will remain as permanent features of the site enabling additional and conservative collection, detention, and infiltration of stormwater runoff.

Currently, the site consists of pasture and crop fields, which typically includes frequent tillage, disturbance, grazing, and chemical applications associated with agricultural production. With the proposed site design, the entire site will be stabilized and maintained with vegetative cover; areas beneath the solar arrays will be planted with grass to stabilize the site. Vegetative cover will generally consist of native grasses, clover, and pollinator seed mixes where appropriate.

The conversion of the intensively farmed and tilled agricultural land to stable, permanent vegetation is beneficial to reduce runoff and improve downstream waterways. During a rain event, the proposed permanent and deep-rooted vegetation better slows and captures runoff

than disturbed and grazed areas. There will be no further broad-scale application of chemicals associated with ongoing agricultural activities, meaning no more downstream runoff or adjacent property drift from these chemicals during the life of the project. The proposed vegetative covers not only project the site against erosion, but also provide nourishment to the soils over the life of the project, allowing the soil to rest from crop production or intensive grazing.

4. Property Values

Although the solar industry is frequently faced with claims to the contrary, there is no evidence that development of the Project will create an adverse impact to property values in the vicinity. A property value impact study is enclosed as Attachment L.

5. Land Use

Development of the project will result in a change of land use, from agriculture use to solar energy production. However, the approximately 560 acres to be developed represents only 0.27% of the more than 209,000 acres of productive agricultural land in Augusta County[3]. As such, the Project will provide the numerous benefits described above in Section III with no material adverse impact to the overall agricultural community in Augusta County. The North Carolina State University has published *Balancing Agricultural Productivity with Ground-Based Solar Photovoltaic (PV) Development,* which discusses the land-use implications of ground-based solar PV development and is provided for reference as Attachment U.

6. Other

Solar farms are clean, safe, quiet, low impact uses. They are completely dark at night except for a small number of safety lights at the switchyard and substation that are unobtrusive and directed downward. The sites do not use groundwater during or after construction, preserving rural aquifers for other uses.

Solar farms require virtually no County resources. They do not add students to crowded schools or school buses. They have no public water or sewer needs. Additionally, they require little to no protection from law enforcement, and generate no trash for disposal or recycling that cannot be hand carried away. To the extent that they may require fire, or emergency services,

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[3] Table 50. Existing Land Uses in Augusta County, 2005 from Augusta County Comprehensive Plan Update 2007-2027 – Volume 2, *April 25, 2007, as amended January 28, 2009*. https://www.co.augusta.va.us/home/showdocument?id=1870

Round Hill will offer both access and training to Augusta County or local volunteer forces to the extent requested or required.

V. CHAPTER 25-70 COMPLIANCE

For a simplified checklist of this Project's compliance with the Augusta Zoning Ordinance, please refer to the checklist provided as Attachment T. For overlays showing the project location on Augusta County's current zoning map and future land use map, please see Attachments R and S.

25.70-4 Standards for Uses Permitted by Special Use 25.70-4

A.1. Conformity to Comprehensive Plan

Like all special use permit applications, the proposed project must be reviewed for conformity with the County's Comprehensive Plan. As of the date of this application, the Comprehensive Plan does not mention solar energy generation specifically. As a result, the Planning Commission must determine whether the location, character, and extent of the proposed facility is substantially in accord with the Comprehensive Plan or part thereof. See Code of Virginia § 15.2-2232.A. The proposed project is consistent with several of the County's policy and land use goals identified in the Comprehensive Plan, as discussed below.

Agriculture

Goal 2: Protect existing agricultural and forestry operations in the Rural Conservation and Agricultural Conservation Areas from conflicts with other land uses and from being converted to other land uses.

Objective B: Discourage encroachment of residential land uses into areas that have good prospects for long-term farming or forestry activities.

Applicant Comment: The Comprehensive Plan establishes a goal of locating 90% of future residential growth in the Urban Service Areas (80%) and Community Development Areas (10%). The Urban Services Areas are "appropriate locations for development of a full range of public and private land uses of an urban character on public water and sewer." Comprehensive Plan Update, page 8. The Community Development Areas are "local community settlements which have existing public water or public sewer systems in place or which have relatively good potential for extensions of either of those utilities" and are "appropriate locations for future low density, rural land uses based upon road access, the existing land use pattern, and proximity to existing public facilities and services." Comprehensive Plan Update, page 9. Accordingly, future residential development is discouraged in areas of the County where public investment in water and sewer utilities has not been made or is not planned.

The proposed project is consistent with this Objective because most of the proposed project would not occupy land where the County has planned for future residential development. None of the project parcels are in an Urban Service Area and only a small portion of the project parcels (approximately less than 15%) are in a Community Development Area. The proposed project would protect the land from residential development for many years during the useful life of the solar energy system. Upon decommissioning, the protected land could be returned to an agricultural use. Therefore, from a long-term planning perspective, the proposed project discourages encroachment of residential development into areas that have good prospects for long-term farming or forestry activities. Moreover, as described above, while the Project does represent a change in land use, it utilizes only 0.27% of the County's productive agricultural land. This change will not significantly or adversely affect the overall agricultural community.

Economy

Goal 1: Promote business retention and attraction strategies that are complementary to both new and existing businesses.

Objective A: Attract industries and businesses which are compatible with and enhance the county's economic climate as well as its environmental, scenic, agricultural, and historic character.

Policy 5: Balanced Industry Base. The county should seek to attract businesses and industries that will help to maintain a balanced economy. The county should, in particular, respond to any loss of businesses and industries by attracting new businesses and industries that will help to regain that balance.

Applicant Comment: In addition to bringing significant tax revenues, increased economic activity, and new jobs and a new employer, the proposed project would bring a new business and industry to the County. Solar and renewable energy generation represents an innovative and growing industry. By providing employment and job training opportunities to Augusta County residents, the proposed project would make Augusta County workers more skilled and competitive participants in an important growing industry in Virginia.

Consistent with this Policy, the proposed project offers a unique and exciting opportunity to introduce a new business to the County and diversify both tax revenues to the County and income streams to residents and the labor force.

Goal 4: Identify key sites and ensure they have the physical infrastructure and site readiness necessary to be attractive to new businesses and industries.

Objective A: Provide adequate land and facilities for future business and industrial development.

Policy 5: Private Efforts. Assist private developers with the identification and development of appropriate areas for commercial or industrial facilities.

Applicant Comment: The proposed project requires minimal governmental development efforts to bring a new employer and revenue source to the County. Moreover, the proposed project is located in areas where the County has not made significant investments to attract development. Instead, the proposed project protects the County's existing and planned investments because it does not take up land where investments have been made to accommodate more intensive uses. As a result, the project parcels are especially appropriate for a solar energy system, and the proposed project would further this Policy of the Comprehensive Plan.

Land Use and Development

Goal 1: Encourage a compact, orderly, and coordinated development pattern in the Urban Service and Community Development Areas

Objective C: Prevent conflicts between residential, business, and industrial land uses as well as agricultural uses located in adjacent Rural Conservation and Agricultural Conservation Areas.

Policy 1: Buffers. The county should encourage that adequate buffers be provided on each site to provide protection and transition between uses of differing densities or intensities. Buffers should use existing topography and vegetation to the maximum extent possible but should provide additional buffer materials, such as walls, fences, berms, or additional landscaping, wherever necessary to provide adequate visual protection between adjacent properties.

Business and industrial developments should be encouraged to provide adequate landscape or topographic buffers and screening between the business or industrial use and any existing or planned adjacent non-business or industrial uses.

Applicant Comment: Consistent with this Policy and the requirements of the County solar ordinance, the proposed project includes buffers to minimize the visual impact of the proposed solar facility equipment from other non-business uses. The proposed landscape buffers are shown on the attached site plans and make use of existing topography and vegetation to achieve buffering where possible. In addition, the proposed project includes plantings where appropriate to provide a buffer from non-business uses. The proposed buffers would allow for harmonious integration of the solar energy system into the existing landscape. As a result, the

proposed buffers provide a transition between the solar energy system and other nearby uses in a way that prevents conflict between the proposed project an adjacent Agricultural Conservation Areas and Rural Residential Areas. Additionally, a low-impact use such as large scale solar provides an orderly transition from more intensively developed areas to the south near Stuarts Draft to more rural Agricultural Conservation areas to the north.

Natural Resources

Goal 3: Promote development layout that protects natural and scenic resources by design.

Objective B: Consider adopting performance standards that can be incorporated into the zoning and subdivision ordinances, and which would apply to all development applications. Consider making the standards mandatory in the Rural Conservation and Agricultural Conservation Areas, while maintaining flexibility in the Urban Service and Community Development Areas.

Policy 1: The Performance Standards Table identifies a stream buffer of 100 feet on either side of a stream or the limit of the flood plain (whichever is wider).

Applicant Comment: Consistent with the goals of this Policy, the proposed project includes stream buffers adjacent to solar panel areas. The width of the proposed stream buffers varies depending on the unique features of the property. The proposed steam buffers have been carefully designed to protect natural and scenic resources on the property. The proposed project proposes stream buffers of various widths in different areas of the site. Many of proposed buffers range from 50 to 100 feet, and the minimum of any proposed stream buffer is 35 feet.

- There are no named streams on-site. Project design is aimed at protecting smaller streams and wetland areas per our USACE delineation, with minimum buffers 35 feet and 100 feet or more in many cases throughout the site.
- Much of the perimeter of the site will be ditches and stormwater basins to collect runoff from the project and release it in a controlled manner. These features would likely be located within 100 feet of streams and wetlands, due to the topography of the site. Essentially, features are placed to minimize grading and preserve natural drainage patterns into existing features.
- Any project development (including stormwater management basins) that would be within 100 feet of these features would be low intensity. For example, most of these areas would comprise of vegetative cover with little to no impervious area.
- The stabilization of areas around the streams with permanent vegetative cover, whether through unused project areas, stormwater management areas, or proposed array areas, is functionally a far improved buffer compared to the crop production or intensive grazing occurring up to and within these features today. Thus, the proposed Project largely meets or improves upon the existing conditions within these buffer areas.

General Government

Goal 3: The county will strive to be a good steward of the environment.

Objective B: Continue to support recycling and other "green" initiatives.

Policy 1: Education. The county will continue to offer environmental programs to the public including those about recycling, rain barrels, composting, and other "green" initiatives.

Policy 2: Outreach Efforts. The county will continue to participate in events such as the Augusta County Fair, Sweet Dreams, and Earth Day educating the public about recycling and other environmental initiatives.

Applicant Comment: The proposed project is a green initiative. Having a large solar energy facility in the County would present a unique opportunity for community education and long-term community engagement with a state of the art renewable energy facility. The proposed project, like the initiatives mentioned in Policy 1, promote good stewardship of the environment. For example, the proposed project would generate enough green, emissions-free energy to power 14,000 homes, roughly the equivalent of the number of households in Stuarts Draft and Waynesboro combined, according to 2014-2018 U.S. Census data. Section III.F above further describes the resulting equivalent reduction in emissions as compared to comparable conventional energy production.

Utilities

Goal 2: Ensure that public sewer and water facilities are provided in an efficient and cost-effective manner in terms of the size, location, design, and pattern of the systems.

Objective A: Coordinate the provision of public water and sewer with the location of development.

Policy 3: Funding Infrastructure Improvements. The county should consider making strategic investments in infrastructure, such as sewer trunk lines and water tanks, to facilitate growth in key areas where there is a reasonable expectation for a return on the investment. The county may provide direct financial assistance for infrastructure projects in combination with other sources such as state and federal grants or loans, the establishment of service districts, privilege fees, or other similar mechanisms aimed at keeping the fiscal impacts on the Augusta County Service Authority rate payers, as well as the county citizens at large, to a minimum.

Applicant Comment: The proposed project does not interfere with existing taxpayer investment in expanding water and sewer service. The proposed solar facility would not permanently

prevent the eventual development of the small portion of the proposed project site designated for the Community Development Area. The project parcels that are in the Community Development Areas are on the perimeter of the project site. Given their peripheral location relative the proposed solar facility, these parcels could be readily repurposed and incorporated into future residential growth that may be proposed on contiguous parcels in the adjacent Community Development Areas. The Augusta County Service Authority (ACSA) owns an existing 6" diameter water main that traverses White Hill Road through the proposed project area. There are no known service lines to the property nor plans for residential development at this time.

Goal 4: Coordinate with non-public utility providers including telephone, gas and electric services in order to ensure adequate provision of services.

Objective C: Encourage distributed solar and carefully sited utility scale solar as a means of achieving renewable energy goals.

Policy 1: Economy. Recognize the employment opportunities, especially for distributed solar, and economic diversification opportunities that utility scale solar provide.

Applicant Comment: As noted in the Economic and Fiscal Contribution Study in Attachment H, and summarized in Section III.D of this narrative, the Project is expected to bring 400 construction jobs and 8-10 permanent jobs to the County, as well as additional workforce development opportunities. Strata will work with Blue Ridge Community College on both recruiting and workforce development opportunities, both directly and via the SHINE program (https://www.shine.energy/). The work experience and training of County residents provided by the Project will diversify the County's workforce and will allow County residents to participate in the innovative and expanding opportunities involved in the utility-scale solar industry. In addition to jobs, construction and operation of the project will provide an "economic boost" to the area given the project's purchase of local goods and services, local payroll, and payments to landowners. Finally, the Project would help achieve the Commonwealth of Virginia and Dominion Energy's long-term renewable energy goals, described in greater detail in Section III.F of this narrative.

Policy 2: Rural viewsheds. Desire to maintain rural viewsheds and agriculture as a predominant component of our economy, but sees synergy among agricultural and rural land development and utility scale solar development so long as the clustering, size, or fragmentation of such facilities does not have undue adverse impact on the surrounding neighborhoods.

Applicant Comment: As discussed in greater detail below in Section IV.B.2 of this narrative regarding visual impacts, Section V of this narrative regarding Section 25-70.6 of the Zoning Ordinance, and the Landscaping Buffer Illustrative Exhibit provided at Attachment D, the Project was sited with protection of rural viewsheds in mind. The location of the site helps to

minimize significant offsite views of the entire Project, as the topography helps to break-up viewsheds. The Project also proposes to use both natural buffers and newly-installed vegetative buffers to protect the viewsheds in the surrounding areas. Some of the proposed new buffers would be planted in places where no screening exists today and have been selected to blend in with existing vegetation and would contribute to the existing rural and agricultural landscape. In addition, because the Project is concentrated on several large parcels, allowing for generous setbacks, the Project avoids undue adverse impacts on surrounding properties. The selection of large parcels allows the Project to be designed in a way that minimizes clustering and fragmentation of the proposed solar equipment. The Project proposes viewshed protections through the landscaping shown on the Landscaping Buffer Illustrative Exhibit provided at Attachment D.

Policy 3: Agricultural landscape and economy. Siting of projects should evaluate the agricultural landscape of the project area and surrounding area to assess the effects of a project on the agricultural economy.

Applicant Comment: Although development of the Project will result in a change in land use of the parcels on which the project is sited, the Project will have no impact on the overall agricultural economy or landscape of Augusta County. Augusta County currently has over 300,000 acres of land zoned General Agriculture. Conversion of 880 acres to a utility-scale solar use represents a loss of less than 0.3% of the County's agricultural land. Other development pressures and land use conversions within the County exert commensurately greater impacts on the agricultural economy. For example, as noted at page 5 of the 2014/2015 Comprehensive Plan Update, "there are tens of thousands more building lots that could be created through the minor subdivision process." Over the life of the Project, by-right residential growth in the General Agriculture district is likely to have a much more significant impact on the agricultural economy than a utility-scale solar facility, which preserves land that can be returned to agricultural use upon decommissioning. A properly-sited utility-scale solar project such as this, with appropriate setbacks and vegetative buffers, can coexist with adjacent agricultural uses and not adversely impact the overall agricultural landscape of the region.

Moreover, the Project will keep several large parcels of land intact for many years. Preserving large parcels encourages agricultural uses and reduces increased residential units on agricultural land through subdivision. The Applicant notes that in fact a portion of the Project site was indeed included in a community development area which would have allowed such conversion. From a long-term perspective, the Project will help keep a significant portion of land available to support the County's agricultural economy in the future.

Policy 4: Prime farmland and Agricultural and Forestal Districts. Siting of projects in Agricultural and Rural Planning Policy Areas should consider the presence of prime farmland producing soils and/or adjacent Agricultural and Forestal Districts.

Applicant Comment: As shown on Map 42 of the 2007 Comprehensive Plan, some of the Project site is "prime farmland" as determined by the US Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS), or is "farmland of statewide importance" recognized by the state. A version of Map 42 showing the approximate boundary lines of the Project site is provided at Attachment W. In the area of the Project site, however, these land designations are not as concentrated as in other areas of the County (such as the area east of Stuarts Draft). Less than half of the Project site itself carries one of these soil designations, with "prime farmland" only accounting for approximately one-fifth of the Project site according to USDA soils data. Also, as noted above, the Project allows the underlying land to be returned to an agricultural use after the decommissioning of the proposed solar facility, will keep several large parcels of land intact for many years, will reduce pressure on rural residential subdivisions, and will ultimately keep a significant portion of land available to support the County's agricultural economy in the future. Additionally, since utility-scale solar and agricultural uses can coexist well, the project will have no impact on adjacent agricultural uses. The Project is not located near any of the County's four Agricultural/Forestal Districts.

Policy 5: Visual impact. Siting of projects should take into consideration surrounding neighborhood developments and how visual impacts to those neighborhoods can be mitigated through appropriate buffers. Siting and design of projects should strive to utilize existing vegetation and buffers that exist naturally when adjacent to public rights of way or other adjacent property.

Applicant Comment: As stated above and discussed in greater detail below in Section V of this narrative regarding Section 25-70.6 of the Zoning Ordinance, and on the Landscaping Buffer Illustrative Exhibit provided at Attachment D, the Project proposes appropriate setbacks and a variety of natural buffers and newly-installed vegetative buffers to mitigate potential visual impacts in the surrounding areas. The Project will specifically preserve and utilized existing vegetation and buffers that exist naturally to provide screening and reduce visual impact as described in Section II.F of this narrative and shown on the Landscaping Buffer Illustrative Exhibit provided at Attachment D.

Policy 6: Balanced land uses. Desire to balance the utility scale solar land use with other important and valuable land uses for our citizens. The size/extent of projects should be considered in proximity to other developed land uses so as not to have undue adverse impacts on the existence of nearby developed residential, commercial or mixed-use communities. Consideration of existing Augusta County Service Authority infrastructure be made.

Applicant Comment: The area in the immediate proximity to the Project is largely devoted to agricultural uses on large parcels. Given that the surrounding area is generally characterized by large tracts of land dedicated to a single use (*i.e.*, agriculture), the size and extent of the Project conforms to its immediate surroundings. Stuarts Draft is the nearest area with more intensive residential and commercial uses. The Stuarts Draft Small Area is comprised of 17,883 acres according to the Stuarts Draft Small Area Plan, whereas the Project is comprised of 880 acres.

Therefore, the Project, by itself, is of a size and extent that is much less intrusive than Stuarts Draft (the nearest area of intensive development). Because the Project has been carefully sited to be minimally intrusive, the proposed solar facility can be well integrated into Augusta County overall, even though the proposed site would be used for a different purpose than it is today in the years the Project is operational. The Project includes setbacks of 200-800' or more in combination with existing vegetation and proposed screening to minimize impacts on the rural residential area between White Hill and Churchmans Mill Road. Setbacks and screening from Tinkling Springs Road will also minimize impacts to adjacent properties and any future development along Tinkling Springs Road.

With regard to existing Service Authority infrastructure, as stated above, the proposed Project does not interfere with existing taxpayer investment in expanding water and sewer service because the proposed solar facility would not permanently prevent the eventual development of the small portion of the Project site within the Community Development Area. The Project would pause the future development of a small portion of the Community Development Area, which could result in an interim small loss in ACSA revenue during the duration of the lifetime of the Project life. However, any impact is this regard would be minimal to ACSA's overall budget. Moreover, if the Board of Supervisors elects to enter into the proposed Siting Agreement with the Applicant, the Board may elect to use some of the Siting Agreement funds to compensate ACSA for any effect the Project is deemed to have on ACSA's revenue growth.

Policy 7: Compact, interconnected development. Projects within Urban Service and Community Development Areas should not detract from the compact, interconnected, pedestrian-oriented development pattern.

<u>Applicant Comment</u>: While a small portion of the Project is with the Community Development Area, the Project does not prevent the eventual development of that land nor does it detract from the development of other Urban Service or Community Development Area land outside the Project site. The Project would be located on a cohesive site with minimal fragmentation, such that concentrated tracts of nearby Urban Service or Community Development Area land would remain undisturbed for future development. Likewise, the proposed buffers will mitigate the visual impact of the Project, such that adjacent land uses will not be affected.

Policy 8: Open space. Support projects that seek to actively create opportunities and partnerships that provide for natural open spaces and outdoor recreational activities such as pedestrian corridors, wildlife watching areas, and fishing areas, especially in publicly accessible land and rights-of-ways.

<u>Applicant Comment</u>: The Project is consistent with this policy in that portions of the Project site would remain open space and not otherwise developed. This land will be able to be returned to agricultural use at the end of its life. While it is not anticipated that the Project site would be open to the public., the Applicant would like to participate in educational initiatives or other opportunities for community engagement presented by the Project.

Policy 9: Interconnectivity. For projects that are adjacent to public spaces or other planned developments, encourage projects that provide for trails and linkages to adjacent land planned for or already developed.

Applicant Comment: This policy does not apply to the Project because it is not adjacent to public spaces or planned developments nor any existing or planned trails.

Policy 10: Resource considerations. Projects should be designed, sited, and constructed in a way that protects and preserves the County's natural, scenic, and cultural resources including:

a. Streams, rivers, wetlands
b. Fertile soils
c. Habitats
d. Native vegetation
e. Forests
f. Historic and archaeological resources

Applicant Comment: The Project has been designed, sited, and proposed, and would be constructed in a manner that considers the protection of each of these important natural and historic resources. For example, the Applicant mapped the streams and wetlands and has provided for appropriate buffers protecting these resources in the Project plans. Establishment of a robust grass/clover mix groundcover across the site will protect and replenish fertile soils. Similarly, the proposed plantings of pollinator-friendly species will support fertile soils, habitats, and native vegetation. Existing wooded areas on the northern boundary of the Project site would remain, supporting forests in the County. The Applicant has also undertaken preliminary archeological, cultural, and historic resource evaluations and has and will design the Project to avoid such features.

Policy 11: Natural resource benefits. The County sees value in projects that create additional natural resource benefits through the use of native vegetation, the creation of wildlife corridors, and the use of pollinator species in buffer areas and underneath panels.

Applicant Comment: Native pollinator-friendly species will be planted in some setback areas and in buffers surrounding the Project site. As a condition to the proposed Special Use Permit, the Project would be required to meet a standard measured by the Virginia Department of Conservation and Recreation's "Virginia Pollinator – Smart /Bird Habitat Scorecard" throughout the initial 10 years of operations and to achieve a lifetime certification of those standards. See proposed condition 13(b). The Scorecard evaluation, which measures the Project's achievement of certain natural resource goals, would be completed several times during the life of the Project. In addition, vegetative covering will be maintained across the site, including underneath panels, to minimize erosion. The vegetative cover will include a grass-clover mix across panel areas, and native grasses and pollinator-friendly seed mixes in buffer areas where appropriate.

2232 Review

The 2232 review considers whether the general location, character and extent of the proposed solar energy system are in substantial accord with the County's Comprehensive Plan or part thereof. On August 26, 2020, the Board of Supervisors amended the Utilities section of the Comprehensive Plan by adopting a new objective to "[e]ncourage distributed solar and carefully sited utility scale solar as a means of achieving renewable energy goals." Within this objective are eleven enumerated policies to help encourage carefully sited utility scale solar projects in the County. When one of these policies is discussed below, it is identified as a "Solar Policy."

The following analysis evaluates whether the location, character and extent of the proposed solar energy system are in substantial accord with the Comprehensive Plan in general, and the with the recent Comprehensive Plan amendments regarding utility scale solar projects in particular.

Location

The proposed project is sited on land all of which is zoned for General Agriculture and nearly all of which has a future land use designation of Agricultural Conservation Area. Three small parcels, and a portion of another parcel, on the perimeter of the project area are designated for the Community Development Area in the Comprehensive Plan. The proposed location is in substantial accordance with Solar Policy 7 (Compact, Interconnected Development), which provides that solar projects within the Urban Service Areas and Community Development Areas "should not detract from the compact, interconnected, pedestrian-oriented development pattern." Because the site is entirely outside the Urban Service Areas, and mostly outside the Community Development Areas, the proposed project would not detract from the future development pattern of those Areas as envisioned in the Comprehensive Plan.

The proposed location is outside the priority growth areas (Urban Service Areas), and thus would not further limit the amount of land available for the most intensive types of development. By avoiding growth areas, the proposed project will not conflict with public infrastructure investments in those areas. As such, the proposed location is in substantial accordance with the requirement in Solar Policy 6 (Balanced Land Uses) that "[c]onsideration of existing Augusta County Service Authority infrastructure be made." In addition, the proposed project location is near the Stuarts Draft small area, which allows for a mix of uses. The proposed project would serve as a transition between adjacent agricultural uses and the mix of uses, including low density residential, in the Stuarts Draft small area.

Character

The character of the project parcel and the surrounding areas is rural and agricultural. Recognizing the importance of preserving this character, the proposed solar facility has been designed to minimize visual impacts to the surrounding agricultural areas through generous setbacks and vegetative buffers. The proposed setbacks and buffers reflect a "[d]esire to maintain rural viewsheds" as identified in Solar Policy 2 (Rural Viewsheds). Likewise, the proposed setbacks and buffers "strive to utilize existing vegetation and buffers that exist naturally," as recommended in Solar Policy 5 (Visual Impact). In

addition, the vegetative covering proposed to be planted in the setbacks, buffers, and underneath the panels will protect natural resources by incorporating "the use of pollinator species in buffer areas and underneath panels," as recommended in Solar Policy 11 (Natural Resource Benefits). After construction is completed, the proposed project would not significantly impact traffic. The proposed project's long-term use of public roads would be more in keeping with (and perhaps less than) that of an agricultural operation than a traditional industrial facility.

Similarly, the proposed solar arrays are designed in a compact layout. The concentrated organization of the proposed arrays gives the project an internal focus – much like a traditional agricultural operation – rather than a sprawling and auto-centric organization more typical of an industrial facility. This aspect of the proposed solar facility's layout demonstrates that the design process has "evaluate[d] the agricultural landscape of the project area" and "assess[ed] the effects of a project on the agricultural economy" in accordance with Solar Policy 3 (Agricultural Landscape and Economy). The proposed layout will allow the project to be integrated into the surrounding agricultural landscape and economy.

Most importantly, the proposed solar facility will allow the land to be returned to agricultural use or open space upon decommissioning. Thus, any change to the character of the project parcels would not be permanent. Rather, the proposed project will keep several large parcels of land intact for many years, will reduce pressure on rural residential subdivisions, and will ultimately keep a significant portion of land available to support the County's agricultural economy. Some of the project land is "prime farmland" that would remain available for agricultural use after decommissioning of the proposed solar facility, consistent with Solar Policy 4 (Prime Farmland and Agricultural and Forestal Districts).

Extent

The extent of the proposed project is in keeping with existing uses on the project parcels. The entire project encompasses an area of 880 acres, with three of the project parcels in excess of 200 acres. In addition, the entire project area is owned by only two land owners. By siting the proposed project on large parcels under mostly common control, the extent of the project is consistent with the extent of existing uses on large parcels. Therefore, the proposed project is in substantial accord with Solar Policy 6 (Balanced Land Uses), which provides that "[t]he size/extent of projects should be considered in proximity to other developed land uses so as not to have undue adverse impacts on the existence of nearby developed residential, commercial or mixed use communities."

The proposed project does not create additional demand on County resources such as public water and sewer, schools, parks, and other public facilities. The largely passive nature of the proposed project further reduces the extent of its potential impact on County resources.

For these reasons, the Applicant respectfully requests the Planning Commission find that the Project complies with Virginia Code § 15.2-2232, because the Project is in substantial accord with the Augusta County Comprehensive Plan or part thereof.

A.2. Impact on Neighborhood

The Project will not have an adverse impact on the surrounding neighborhood given its rural location, setbacks, and vegetative buffers. Because the Project is proposed on large parcels, the majority of the solar panels will not be located near property lines with neighboring parcels. Moreover, the proposed vegetative buffers will preserve the overall rural visual character of the area. While the Project would represent a change in land use, the proposed use is a low-impact operation. Once the solar facility is built, there would likely be less activity on the project parcels than exists today with traditional agricultural uses.

B.1. Large Solar Energy Systems

The Round Hill Project will be connected to Dominion's and PJM's transmission system and as such power will be sold via the wholesale electricity markets and not used primarily for the onsite consumption of energy by a dwelling or commercial building.

25.70.5 Applications and Procedures

A. Community Meeting

A public meeting was held on June 30, 2020 at 7pm to inform the public about the planned solar energy system installation prior to the submittal of this application. The meeting was held online via GotoWebinar to prioritize the safety of the community during the COVID-19 pandemic. Property owners within one (1) mile of the property boundary were notified by mail on June 19, 2020 of the public informational meeting (within the at least five (5) business days and not more than twenty-one (21) working days prior to the meeting window). The date, time, and location of the meeting, along with a summary of the project and contact information of representatives, was included in the mailers. Attendees were able to submit questions and comments to the meeting facilitators who responded during the meeting. Attachment O – Community Meeting Report includes a mailing list of property owners notified, the notice sent, a sign-in sheet from the meeting, an agenda from the meeting, questions asked during open question-and-answer time, and the visual presentation from the meeting to provide a summary of content.

B. Project Description

A narrative description of the solar energy system is provided above in Section II.

C. Cost Benefit Analysis

The Project will bring a number of fiscal, economic, employment, environmental, and energy policy benefits to Augusta County and Virginia. A full economic impact study for the Project was completed by Mangum Economics and is provided as Attachment H. A summary of the multiple benefits the Project will provide is contained in Section III above.

D. Site Plan

A SUP Concept Site Plan is included as Attachment E of this application. The Site Plan includes the following information in accordance with Augusta County Solar Ordinance:

1. Property lines and setback lines;
2. Existing and proposed buildings and structures, including approximate locations of proposed solar arrays;
3. Existing and proposed access roads and potential laydown and storage yards; and,
4. Location of proposed substation and associated equipment;
5. Additional information relating to the site plan included in this application include scaled elevation views, site photos, photo simulations, and landscape plans provided in Attachment D;
6. Limited Power of Attorney forms documenting Applicants proof of control over the land are provided in Attachment Q;
7. A Decommissioning Plan is included as Attachment F.
8. A certificate of insurance providing proof of adequate liability insurance is included as Attachment P.

25-70.6 Location, Appearance, and Operation of Project

1. Visual Impacts

Consideration of visual impacts is a key component of the Round Hill Project design. The project has been carefully sited on large tracts of land to minimize visual impact of the project from neighboring properties and roadways. Where the project may give rise to potential impact on the visual character of a scenic landscape, vista, or scenic corridor, the Applicant proposes to use a combination of existing topography and vegetation, along with several types of planted buffers, to minimize the visual impacts. The proposed visual mitigation is shown on the Landscape Buffer plan within Attachment D and is described in greater detail in subsection 7 below.

2. Height Restrictions

The Applicant acknowledges that ground-mounted systems shall not exceed fifteen (15) feet in height when oriented at maximum tilt. Refer to Note 14 of Attachment E – SUP Concept Site Plan.

3. Signage

The Applicant proposes warning signage as required per the Solar Ordinance. Per Attachment E – SUP Concept Site Plan, aluminum signs reading "Danger – High Voltage" and "Danger – No Trespassing") measuring fourteen (14) by ten (10) inches in size will be placed on permanent security fencing, at each 100-foot interval around arrays. The Project will also employ nonobtrusive signage providing 24-hour emergency contact information. All property containing panels will be enclosed with chain link fencing 7' tall topped with barbed wire and secured with gates per 25-70.6G.H.

Publicly accessible signage for pollinator habitat areas is also proposed to per the Virginia Pollinator-Smart/Bird Habitat Scorecard Version 2.0a. The location and details of signage will be determined at Vegetation Management Plan approval.

4. Noise

As described in Section IV above, solar energy systems are quiet uses. Audible sound from the Project will not exceed 60dBA (A-weighted decibels), as measured at any adjacent non-participating landowner's property line. Please refer to Attachment J – Noise Memo for further information.

5. Setbacks

Round Hill has proposed varying setbacks from equipment to property lines ranging from a minimum setback of 50 feet along property lines bordering agriculturally used land to setbacks of 200 feet or more in other areas. Setbacks are also proposed along public rights-of-way interior to the site along Guthrie Road. Section IV above describes how such varying setbacks are adequate to protect neighboring properties and requests the Board of Supervisors concurrence with this as per 25-70.6E. The SUP Concept Site Plan provided as Attachment E includes the locations of these proposed setbacks.

Setbacks will be kept free of all structures and parking lots, except for permitted use in the buffer area per 25-70.6G.E. including but not limited to stormwater management facilities and temporary construction laydown areas. However, there shall be no reduction in vegetative buffer width based on the stormwater management facilities.

6. Ocular Impact Study

An ocular impact study was performed for the airport within five miles of the site and for several public road locations around the perimeter of the site. The study was performed using the Solar Glare Hazard Analysis Tool (SGHAT) which detected no glare at any location. The reports are enclosed as Attachment N.

Please note that glare is more commonly associated with fixed tilt solar systems, in the early morning and late evening, due to the fixed east-west orientation of the panels. Early or late in the day, glare can glance across the panels at a nearly flat angle. The proposed system here is not a fixed-tilt, but a tracking system, in which the panels are oriented north-south and rotate to track the sun during the day. The angle of the sun is closer to 90° to the panels as they track, which causes less opportunity for glare.

7. Buffering

As described above in Section II and shown in Attachment D, a buffer yard will be provided and maintained adjacent to any property line at the boundary of the Project and landscaped to mitigate the visual impact of the Project. The Applicant proposes a combination of preserving existing wood lines and woodlots where possible and planting new vegetative buffers in areas where no or insufficient buffers exist today.

The Applicant acknowledges the intent of buffers to provide the maximum level of protection per the Ordinance. To best mitigate visual impacts and comply with ordinance requirements, the Applicant proposes use of existing vegetation and three types of new vegetative buffers for the perimeter of the site. These types incorporate a mix of plant material and knowledge of the growth pattern and spacing requirement of tree species. The types are summarized as follows:

- Existing Vegetation – a minimum of 30’ of existing vegetation, or a minimum 30’ wide combination of existing treelines plus one of the buffer types described below

- Type A – 30’ wide buffer of a continuous mixed evergreen screen;

- Type B – 35’ wide buffer of mixed evergreen and ornamental tree screen; and,

- Type C – 50’ wide buffer of a mixed evergreen and ornamental tree screen with shrub plant material.

In addition to the buffer materials and widths mentioned above, a 10’ wide strip of native grasses and wildflowers will be planted adjacent to newly planted buffers to provide native

pollinator habitat around the project and a diversity of plant material within the setbacks. These areas are proposed adjacent to all buffer types planted within the Project.

Existing vegetation comprised of existing woodlots and treelines shall be used as buffers in areas as shown on the Landscape Buffer plan within Attachment D. This existing vegetation provides the required buffer benefits and is being proposed in these areas as an alternative to the buffer composition specified in the Ordinance and thus complies with the Ordinance per 25-70.6 G.F.6. Alternative Compliance. Much of the northern boundary of the site has existing woodlots which, combined with topography, screen the site from view from areas to the north of the Project.

Type C buffers comply with Ordinance buffer requirements of 25-70.6 G., Alternative 2 based on plant types provided, and in fact exceed these requirements as they are proposed at 50' wide vs. 20' wide. These buffers (50' wide) are proposed along White Hill Road to shield or break up views of passing vehicular traffic and some properties to the south. The proposed mix of plant material achieves a natural aesthetic mix while providing maximum screening of the Project area along adjacent high-trafficked right-of-way or residential properties.

Type B buffers (35' wide) are proposed for Guthrie Road, along the interior property lines and where the project borders adjacent landowners to the north along Guthrie Road. Type B buffers are also proposed along Churchmans Mill Road to break up the viewshed from the public right-of-way. The substation and switchyard areas, located on the interior of the Project, will also be screened on three sides with Type B buffer sections. The intent of this buffer is to provide screening of the project along lower-trafficked public rights-of-way with a natural mix of evergreen and ornamental vegetation.

Type A buffers (30' wide) are proposed along the majority of the property lines where adjacent uses are agricultural land, residential land greater than 200 feet from the project area, and where distances from Tinkling Spring Road to the Project area further restricts views of the site from public right-of-way. These buffers are intended to provide some break-up of the viewshed in areas where denser or more varied plantings types would be less effective.

Types A and B buffers comply with Ordinance buffer requirements of 25-70.6 G.F. Alternative Compliance, since in the locations proposed they meet one of more of the following criteria:

1. The buffer is parallel to an adjacent utility easement (e.g., areas north of Guthrie Road along the transmission line);
2. The buffer is between uses that are to be developed under a common development plan (along Guthrie and Churchmans Mill Roads)

3. The topography of the parcel is such that buffering would not be effective (or is effective regardless of which buffer type used - various locations)
4. There is existing vegetation that provides the required buffer benefits (various locations)

An example of this is the buffers in the southeastern portion of the property considering both site topography and existing vegetation to maximize the impact of these planted buffers, as discussed in the Alternative Compliance criteria of Section 25-70.6 G. The cross-section view contained in Attachment D from Tinkling Spring Road shows the existing natural vegetation and topographic pattern that significantly breaks up the view of the project and blocks most of the site, independent of the planted buffer proposed.

The Applicant proposes that the composition and placement of each buffer type satisfies the intent of the Ordinance to achieve the maximum level of protection. Each type provides appropriately placed screening and plant species to either shield adjacent properties from views of the Project, or minimize visual impact, taking into account the existing vegetation, topographic factors, and neighboring properties and land uses. See the Landscape Buffer Illustrative Exhibit package, provided as Attachment D, for buffer details and renderings of typical elevation views and line-of-sight profiles at key points throughout the Project site.

25-70.6 Safety and Construction

8. Design per Building Code

The Applicant shall ensure that the design of any buildings and structures associated with or part of this solar energy project complies with the applicable sections of the Virginia Uniform Statewide Building Code (USBC) (13VAC5-63). This requirement includes all electrical components of the solar energy facility. Compliance with this requirement will be met under submittal of final site construction plans.

9. Construction and Installation

The Applicant understands that *"Any electrical wiring used in the system shall be underground except where wiring is brought together for inter-connection to system components and/or the local utility power grid. Electrical distribution lines between the inverters and the point of interconnection shall be underground except where crossing creeks, floodplains, wetlands, and at the point of interconnection. Nothing in this condition shall prevent the ability to utilize underground boring technology" (Augusta County Draft Conditions for SUP Approval, dated May 22, 2019.)*

Wherever practicable, electrical wires associated with the Project will be attached to the panels and racking system or installed underground, except for wiring and bus work in the project substation and interconnection switchyard. In locations identified with subsurface rock or karst conditions, overhead crossings may be utilized. Overhead lines may also be utilized in areas with environmentally sensitive features or Department of Transportation (DOT) jurisdiction, to minimize impacts to these areas.

10. Ground Water Monitoring

Solar projects do not contain materials which can leach and cause ground water contamination. Nonetheless, the Applicant will work with Augusta County Staff to prepare and provide a Ground Water Monitoring Plan to monitor groundwater contamination prior to construction, every five years during operation of the Project, and at the completion of decommissioning. This Plan will be provided at the time of site plan approval prior to construction.

11. Traffic Impact Statement

There will be substantial construction traffic for approximately 12 months during the construction period of the project, but long-term traffic is not projected to be significant nor affect the area. Further information on the management of traffic is provided in Attachment I – Traffic Management Plan in this application.

25-70.8 Decommissioning

12. Decommissioning Plan

"As part of the project application, the applicant shall submit a decommissioning plan, which shall include the following: (1) the anticipated life of the project; (2) the estimated decommissioning cost in current dollars; (3) how said estimate was determined; (4) the method of ensuring that funds will be available for decommissioning and restoration; (5) the method that the decommissioning cost will be kept current; and (6) the manner in which the project will be decommissioned and the site restored."

A Decommissioning Plan is included in this application as Attachment F. A Decommissioning Cost Estimate, accompanied by a cover letter, also is provided as Attachment G. These documents comply with the above-mentioned Section 70.8. The plan shall be updated every five (5) years as necessary. The cost estimate incorporates the required twenty-five percent (25%) contingency of estimated removal costs, as further explained in 25-70.9 below.

25-70.9 Bonding

Section 25-70.9 of the Augusta County Solar Ordinance provides guidelines for the surety for decommissioning. Prior to the issuance of a Building Permit for a solar energy system, the Applicant, in summary, shall:

- Submit an itemized cost estimate of the work to be done to remove the energy system, plus twenty-five percent 25% of said estimated costs. This 25% contingency is a reasonable allowance for administrative costs, inflation, and potential damage to existing roads or utilities.

- Submit a bond, letter of credit, or other appropriate surety per the County shall be submitted to the Zoning Administrator.

- Ensure the surety shall remain in full force and effect until the Community Development Department has inspected the site and verified the removal of the solar energy system.

See Attachment F – Decommissioning Plan and Attachment G – Decommissioning Cost Estimate with Cover Letter for further information on the submission of surety.

VI. PROPOSED CONDITIONS

Round Hill Solar recognizes that a Special Use Permit for a utility-scale solar project typically contains conditions of approval. However, the County has not yet granted a Special Use Permit for a utility-scale solar facility, and as such has not developed a Board-approved final set of such conditions. In the absence of such, Round Hill is proposing conditions based largely on those conditions developed by staff and included in the staff report for the Augusta Solar project previously considered by the Board of Supervisors. Proposed Conditions of Approval for the Round Hill Solar Project are provided in Attachment M.

VII. CONCLUSION

Round Hill Solar, LLC respectfully requests approval of a Special Use Permit for the proposed Project and a 15.2-2232 determination of "substantially in accord" with the Comprehensive Plan. This narrative addresses the SUP application and Zoning Ordinance requirements and County and stakeholder questions that have been communicated throughout the preliminary planning of the Project. The Project plan as described herein, and the SUP Concept Site Plan in Attachment E, demonstrate a well-conceived Project that conforms to the Comprehensive Plan and Zoning Ordinance and provides substantial benefits to Augusta County.