

REVISIONS TO
SOLAR ENERGY
FACILITY IMPACT
ANALYSIS DUE TO
ADDITION OF
OPERATIONS AND
MAINTENANCE
BUILDING

OAK TRAIL SOLAR PROJECT CURRITUCK COUNTY, NORTH CAROLINA OAK TRAIL SOLAR, LLC

PREPARED BY:
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T: 704-357-8600 WSP.COM March 21, 2023

Prepared By: WSP USA Environment & Infrastructure Inc. 2801 Yorkmont Road, Suite 100 Charlotte, NC 28208

Prepared For: Oak Trail Solar, LLC 6688 N. Central Expressway, Suite 500 Dallas, TX 75206

WSP Project No.: 6706-19-0060



LIST OF ACRONYMS

E&SC erosion and sediment controls

Facility solar photovoltaic power generation facility

First Solar First Solar, Inc.

H&H hydrologic and hydraulic

NCDOT North Carolina Department of Transportation

Site Oak Trail Project Site
Oak Trail Oak Trail Solar, LLC

O&M Operation and Maintenance

PV photovoltaic ROW right-of-way

SEF Solar Energy Facility

SPCC Spill Prevention, Control, and Countermeasure Plan

SWP3 Stormwater Pollution Prevention Plan

TMEIC Toshiba Mitsubishi-Electric Industrial Systems Corporation

UDO or Currituck County Unified Ordinance Development

Ordinance

UL Underwriters Laboratory

USACE U.S. Army Corps of Engineers

WOUS Waters of the U.S.

SOLAR ENERGY FACILITY IMPACT ANALYSIS

1.0 REVISIONS TO APPROVED IMPACT ANALYSIS DUE TO ADDITION OF OPERATIONS AND MAINTENANCE BUILDING

A Solar Energy Facility (SEF) Impact Analysis was prepared for the Currituck County Use Permit application related to the development of a solar photovoltaic (PV) power generation facility (Facility) at the Oak Trail Project Site (Site). The Use Permit for the Facility was approved by the Board of Commissioners on November 16, 2020 (PB 20-18). This amendment being sought for the addition of the Operations and Maintenance Building ("O&M Building") does not impact the vast majority of the previously reviewed and approved Impact Analysis. The only sections requiring revisions due to the addition of the O&M Building are provided below.

2.0 CONSTRUCTION ACTIVITY PLAN

2.1 AMOUNT OF LAND DISTURBANCE

Construction operations <u>have begun land disturbance under NCDEQ Project ID</u>: <u>Curri-2021-013</u> for clearing and grubbing within areas intended for development of Facility components (e.g. PV modules, substation, utility switchyard, and support construction areas [e.g., construction entrances, laydown yards, etc.]). <u>The addition of the O&M Building, related access road, and parking will add approximately 1.32 acres of land disturbance and a permit modification will be submitted to NCDEQ.</u>

Once construction is complete, temporarily disturbed areas will be restored, including removal of excess road material, de-compaction, and rock removal in agricultural areas, and returned to their approximate pre-construction contours. Exposed soils at the Site will be stabilized by seeding, mulching, and/or plantings.

2.2 LAND SURFACE CLEARING AND GRADING PLAN

O&M Building, access road and parking construction will require additional clearing or disturbance of approximately 1.32 acres. Most of the intended disturbance is expected to occur in previously-disturbed agricultural lands. Existing trees will be protected, to the extent possible. The total construction area under Project ID: Curri-2021-013 is 778.0 acres.

Areas that require grading are expected to be freed from irregular surface changes, smoothed, compacted, and sloped to drain. Where concrete slabs are to be installed, final earth grade will be sloped away to maintain proper drainage. Embankment slopes shall be protected against rutting and scouring during construction in a manner similar to that

required for excavation slopes. Site grading will be compatible with the general topography for the area. As described in Section 2.7, proper erosion and sediment controls (E&SC) will be employed in all disturbed areas.

2.3 ENERGY, WATER, AND MATERIAL NEEDS

Gasoline and diesel fuel are expected to provide the energy needs to equipment and vehicles during construction. Fuel will be properly stored while onsite. Contractors are expected to utilize temporary fuel tanks (stored within proper secondary containment) within the laydown yards for truck refueling during the construction phase.

Temporary power may be required during construction. If construction trailers will require power, temporary service will be obtained from the local electric service provider. Other sources of power during construction include portable generators to be deployed as needed.

The majority of water use during construction will likely be for dust suppression, although another suppressant, such as calcium carbonate, may be used instead of water. If water-based suppression techniques are used, the suppression methods will limit the amount of water that leaves the site as runoff. It is anticipated that dust suppression will be needed throughout the duration of construction activities. Measurable quantities of wastewater will not be discharged from the Facility during construction, as temporary restroom facilities will be maintained and removed from the site at the completion of construction activities.

The primary materials needed for site development include:

First Solar, Inc. (First Solar) panels:

- Series 4TM PV Modules, and
- Series 6TM PV Modules;
- Steel piles to support the panels;
- Single axis tracker systems;
- Toshiba Mitsubishi-Electric Industrial Systems Corporation's (TMEIC) Solar Ware inverters (or similar);
- Overhead/underground cables; and
- Material for construction of the Substation, Switchyard, and O&M Building.

2.4 FENCING AND LIGHTING PLANS

Proposed security fencing during construction will be chain link fence set back at least 150 feet from all North Carolina Department of Transportation (NCDOT) non-major arterial street rights-of-way (ROWs) and property lines in accordance with UDO § 4.2.3.K(3) of the UDO. As described in UDO § 5.2.6, a Type D opaque buffer will be installed for the constructed Facility in accordance with UDO § 4.2.3.K(6).

An O&M Building is anticipated for the Site, and lighting will be implemented in compliance with UDO § 5.4. Security and maintenance lighting is anticipated for the O&M Building.

substation, and inverter locations. The exterior lights will comply with illumination requirements, unless required for security or emergency purposes.

2.6 CONSTRUCTION WORK FORCE AND TIMEFRAME

Approximately 200 contracted workers may be present while constructing the Facility. Construction is anticipated to take 12 months, during which time contracted workers will stimulate the local economy. Construction is anticipated to proceed in the following sequence, with the potential for multiple activities to be performed concurrently:

- Site security;
- Installation of proper E&SC measures;
- Site clearing and grading;
- Access road construction;
- Buffer/screening installation;
- Grading and drainage;
- Pile foundation installation;
- PV module installation;
- Installation of the electrical collection system;
- Installation of inverters;
- Substation construction:
- Switchyard construction;
- <u>O&M Building construction</u>;
- Pollinator habitat installation and site revegetation; and,
- Facility commissioning and energization.

3.0 OPERATION PLAN

3.1 MAINTENANCE ACITIVIES AND SCHEDULE

All critical Facility systems and sub-systems will be properly maintained and will include a scheduled preventative maintenance regimen. Maintenance activities will also include routine equipment repair and responses to unplanned outages.

Facility staff will receive continuous site monitoring and remote control responses from the remote operations center, and the On-Site O&M Building. In addition, staff will receive

continuous predictive equipment health analytics algorithms and automated performance calculations.

On a monthly basis, a safety audit of the Facility and grounds will be performed and will include review of fencing, walkways, fire extinguishers, lighting, and eyewash stations. Staff will perform environmental inspections of any oil containing structures, site vegetation, and drainage in compliance with SWP3 and/or SPCC requirements. All Facility solar equipment will be visually inspected, and the weather station will be inspected and cleaned. Staff will receive remote data validation and performance engineering reviews and analyses.

The annual maintenance plan includes regularly scheduled visual, mechanical, and electrical maintenance activities and is intended to optimize Facility performance and protection. Activities include maintenance of equipment and systems such as: Gen-tie System; Switchyard; Transformers; Breakers; Batteries; Information Technology; Network and Communication Systems; Solar Panels and their Transformers; Inverters; Auxiliary Systems and Sensors, including Meteorological Gauges and Sensors; and Health and Safety Systems (e.g., eyewash stations, etc.

4.9 WATER MANAGEMENT

The Project Area is located in an agricultural area with extensive modified drainage networks and a high- water table. Jurisdictional aquatic features, existing floodplains, and canals will be avoided and protected using appropriate setbacks and BMPs. Prior to Site disturbance, a two-dimensional hydrologic and hydraulic (H&H) model of the Site will be created to simulate rainfall runoff flow, for both pre- and post-development conditions. The results of the drainage modeling and flow analysis will identify the necessary drainage basin size, required sedimentation basin volume, and outfall flow rate and velocity.

Methods will be employed to reduce runoff and water quality impacts including employing BMPs where necessary. Sedimentation controls and BMPs will be inspected throughout the construction process. Construction and operations SWP3s and a Major Stormwater Plan will be developed and implemented at the Facility. Small agricultural ditches within the former fields may be modified, following USACE approval. Setbacks from the flood zone, canals, and other jurisdictional WOUS will be maintained. The drainage ditches and canals adjoining the Site will be maintained to keep the ditches free and clear of drainage impediments.

The proposed Facility will not result in wide-scale conversion of land to impervious surfaces. While PV panels themselves are impervious, they are disconnected from the ground surface so rain can run off the panel and fall onto the pervious underlying surface. In fact, NCDEQ's stormwater design manual states that solar panels associated with ground-mounted solar farms are considered pervious surfaces if configured with the recommendations in the manual, which the Facility will be. The collection substation, O&M Building, O&M related parking, and access roads are the only source of impervious surfaces

within the Facility and are anticipated to generate minimal runoff. Therefore, no significant changes to the rate, make-up, or volume of stormwater runoff are anticipated.



Exhibit 4

Community Meeting Summary

Summary of Community Meeting – O&M Building for Oak Trail Solar, LLC

A community meeting was held at the event venue at Eagle Creek on Wednesday, March 15, 2023 from 6 to 8 PM to present the proposed addition of an operations and maintenance (O&M) building to the Oak Trail Solar Project, receive feedback from community stakeholders and attendees, and satisfy Step 2 of the Special Use Permit review process. A list of attendees and a summary of comments are provided below.

Attendees	Affiliation
Carol Andrews*	Community Stakeholder
Cory Arnold	Community Stakeholder
Doug Cowan	Community Stakeholder
Matt Crook	LRE Representative
Tom Evans*	Community Stakeholder
Owen Etheridge	County Representative
Tammy Glave	County Representative
Richard Harmon	LRE Representative
Mark Hoar	Community Stakeholder
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^{*}Names transcribed from the written sign-in sheet and spelling may be incorrect.

Feedback

Comments raised by attendees during the meeting include:

O&M Building:

- Questions about O&M building location
- Questions about what will be housed in O&M building

Solar Energy Facility Construction:

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Sign-In Cheet		
Oak Trail Solar O&M E	Oak Trail Solar O&M Bldg. Public Information Meeting	Oak trail solar
March 15, 2023		
Name	Address	Email/Phone
Pannie	176 Providence Dr	Strempels Ogmail. com
Grempel	Majock, No	0160-585-151
form pery	177 CAPULA PAS Morcia , NC	popertshane Kelly Egmail.com
Cory Arald	246 Oxford Road Mayork, AC 27957	cory garald@gmail.lon
Dobbie Ivarson Soun Ivarson	413 Groen Lake Rd. Moyock, N.C. 27458	Rutty bear @ Ital . com
Bret + Lisa Washburn	260 Oxford RD Moyock, NC 27958	bwashburn 100 verizon. net
Tammy Glause	Ding Staff	



SIGN-IN SHEET Oak Trail Solar O&M Bldg. Public Information Meeting		e Address Email/Phone	Velonie Valeid	A Manus S	Sta Sunnulak	n Caral	DOVCEAS COWAN 308 SUNNYCAKE ZD.	
Sign-In Sheet Oak Trail Solar	March 15, 2023	Name	Velonie Va	A D X	Str.	In Care	Doverns Co	

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Name	Address	Email/Phone
Pannie	176 Providence Dr	Strempels Ogmail. com
Grempel	Majock, No	0160-585-151
form pery	177 CAPULA PAS Morcia , NC	popertshane Kelly Egmail.com
Cory Arald	246 Oxford Road Mayork, AC 27957	cory garald@gmail.lon
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