FINDING OF NO SIGNIFICANT IMPACT

Gilchrist County Solar Project
Gilchrist County, Florida

Rural Utilities Service
U.S. Department of Agriculture

Florida Renewable Partners

Prepared by:
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A. INTRODUCTION

Florida Renewable Partners Gilchrist County Solar, LLC (FRP) plans to submit a financing request to the U.S. Department of Agriculture, Rural Utilities Service (RUS) to construct the Gilchrist County Solar Project (Project) and connect to Seminole Electric Cooperative, Inc.'s (SECI) electrical grid. The Project will be constructed on land owned by FRP, and electricity generated onsite will be delivered to the grid via interconnection to Duke Energy Florida's (DEF's) Newberry Substation. The Project is located on 578 acres of agricultural land and 3.5 acres of former commercial land, south of State Road (SR) 26, east of SE 80th Avenue, north of SE 110th Street, and west of SE 90th Avenue in unincorporated Gilchrist County, Florida.

RUS is considering this financing request. Prior to taking a federal action (i.e., providing financial assistance), RUS is required to complete an environmental impact analysis in accordance with the National Environmental Policy Act of 1969 (NEPA) (U.S.C. 4231 et seq.), the Council on Environmental Quality's (CEQ) regulations for implementing NEPA (40 CFR Parts 1500-1508), and RD's NEPA implementing regulations, Environmental Policies and Procedures (7 CFR Part 1970). After completing an independent analysis of an environmental report prepared by FRP and its consultant, RUS concurred with its scope and content. In accordance with 7 CFR § 1970.102, RUS adopted the report and issued it as the Agency's Environmental Assessment (EA) for the Project. RUS finds that the EA is consistent with federal regulations and meets the standards for an adequate assessment. FRP published a newspaper notice, announcing the availability of the EA for public review, in accordance with 7 CFR § 1970.102. In addition, RUS considers the Project an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 16 USC 470(f), and its implementing regulation, "Protection of Historic Properties" (36 CFR Part 800).

B. PROJECT DESCRIPTION AND PURPOSE/NEED

The Project will be developed for distributed solar power generation and comprises solar photovoltaic (PV) panel arrays with inverters, at-grade access pathways, an offsite collector yard, overhead distribution line, perimeter security fencing, and other ancillary equipment. The electricity generated onsite will be delivered to DEF's Newberry Substation via a 1.2-mile overhead 34.5 kV distribution line and collector yard. The distribution line is located within a 30-foot-wide easement west of and directly adjacent to SE 80th Avenue. The collector yard is located on SR 26, approximately one mile north of the solar array.

The purpose of the Project is to construct a distributed generation facility that will produce and supply SECI and its nine Member electric cooperatives with enough energy to power approximately 15,000 rural residential homes, in accordance with a 20-year Power Purchase Agreement (PPA) with SECI and a Large Generator Interconnection Agreement (LGIA) with DEF, which are both fully executed. The Project provides SECI the ability to secure competitively priced and reliable electric power over the next 20 years.

C. ALTERNATIVES EVALUATED

1. No Action

Under the No Action Alternative, RUS would not provide financial assistance to FRP, the Project would not be constructed, and the land would remain in agricultural use. SECI and its nine Member distribution electric cooperatives would not receive the required distributed power in accordance with the PPA. The anticipated generation from the renewable energy source would not be available,

and SECI would need to seek alternative electric generation sources to replace existing power supply contracts. Reliable, low cost, renewable electric service would not be provided to customers in this service territory, therefore failing to meet the increasing demand for electricity with renewable energy generation. The No Action alternative does not achieve the Project's purpose and need.

2. **Action Alternative (Preferred Alternative)**

Under the Action Alternative, RUS would consider financing the Project, and FRP would construct and operate a 74.5 MW solar energy center for SECI and its nine Member distribution electric cooperatives. The Project area is a combination of two primary components: a 578-acre photovoltaic solar array, one mile distribution line, and a 3.5-acre offsite collector yard. The solar array will be comprised of inverters aggregated to meet the total Project output. Electrical power from the solar array will be delivered to the collector yard via an approximately 1.2-mile overhead 34.5 kV distribution line within a 30-foot-wide easement, located west of and directly adjacent to S.E 80th Avenue, a public road. The collector yard will combine all alternating current (AC) power from the collection circuits and transform the electrical power to the appropriate voltage. The collector yard will increase the voltage of the Project to match the voltage of the interconnecting DEF substation. The entire solar array will be enclosed within a six-foot chain link fence topped with one foot of barbed wire. The collector yard will be enclosed within a seven-foot chain link fence topped with one-foot of barbed wire. Pathways, typically 12-feet wide and comprising compacted aggregate base material, will be constructed as needed to provide access between the solar arrays. Pathways will be constructed at-grade to maintain pre-development drainage flow patterns. Lighting, designed to minimize spillover into neighboring properties, will be installed at the site entry gate and collector yard. Operable lighting at each conversion station may be installed but will only be used during maintenance activities. Construction activities will include site preparation, system installation, inspections, and system acceptance. Prior to construction, controls will be installed to avoid discharge sediment and erosional material discharge outside work areas and to ensure debris does not leave the Project site. A Stormwater Pollution Prevention Plan (SWPPP) incorporating erosion control best management practices (BMPs) will be prepared prior to the start of construction. The Project is expected to result in a net improvement to stormwater quantity and quality by eliminating agricultural related activities and establishing large grass swales and vegetated buffer areas around proposed impervious areas. Once the Project is constructed, it will be operated on an unstaffed basis and monitored remotely with minimal, scheduled personnel visits for security, maintenance, services, and system monitoring. A Spill Prevention, Control, and Countermeasure (SPCC) Plan will be in place to ensure implementation of appropriate spill response measures. Maintenance kits, spill kits, and certain critical spares will be stored onsite, while all other components will be readily available from a remote warehouse facility.

3. **Alternatives Eliminated from Further Consideration**

Alternative locations and technologies must satisfy siting logistics, engineering, and cost constraints while minimizing social and environmental impacts. Technologies such as wind and geothermal power were not considered because they would not generate enough capacity to meet the required SECI demand. Other properties were considered for the Project, but they were either not available for purchase, did not meet size criteria, or had more environmental constraints which would ultimately result in additional impacts.

D. **SUMMARY OF ENVIRONMENTAL EFFECTS**

The analyses in the EA documented the Project would have no adverse effects to existing land use, important farmland, formally classified lands, floodplains, wetlands, water resources, coastal resources, biological resources, cultural/historic resources, air quality, social impact and environmental justice, noise, transportation, aesthetics, or human health and safety. A summary of anticipated impacts on the human environment is provided below, including any mitigation measures deemed necessary to avoid or minimize impacts. FRP is responsible for implementing these measures.

General Land Use
Land use within the Project area will change from agriculture and commercial to solar power generation. FRP received Special Use Permits from Gilchrist County in March 2021 for development of the solar array and offsite collector yard.

Important Farmland
Based on USDA Natural Resources Conservation Service data, no prime farmland exists within the Project area. No impacts to important farmlands will occur.

Formally Classified Lands
There are no formally classified lands within or adjacent to the Project; therefore, no impacts to formally classified lands will occur.

Floodplains
Approximately one acre along the Project's southwest boundary is mapped by the Federal Emergency Management Agency as being within the 100-year floodplain. However, no grading, fill, excavation, or other improvements will occur within this area; therefore, no impacts to floodplains are anticipated.

Wetlands
No wetlands are present within the Project area; therefore, no impacts to wetlands will occur.

Water Resources
There are no surface waters within the Project area, therefore, no impact to surface waters will occur. FRP will implement a SWPPP to minimize potential for offsite pollutant discharge as required by Florida's National Pollutant Discharge Elimination System (NPDES) Stormwater Program Construction Generic Permit. The Project will entail minor groundwater withdrawals from onsite wells during construction for dust suppression and/or soil conditioning. Overall, there will be a significant decrease from the current agricultural groundwater use associated with row crop irrigation. Additionally, FRP will have a SPCC Plan in place to ensure readiness for any potential fuel spills during construction and operation. Therefore, no adverse impacts to groundwater are anticipated.

Biological Resources – General Fish, Wildlife and Vegetation
The Project is located within previously disturbed land used for agriculture, commercial development, and pine plantation; therefore, impacts to biological resources are minor. While short-term displacement to foraging wildlife may occur during construction, the Project will not have significant long-term impacts to non-listed, common wildlife species, and suitable habitat will remain following construction. Additionally, reduced herbicide use may result in beneficial biological impacts over time. Revegetation with native seed mix will be implemented, and a control plan developed to manage invasive vegetation until desirable species are dominant.

Biological Resources – Listed Threatened and Endangered Species
Federally listed wildlife that may occur within the Project area include the threatened Eastern indigo snake. A request for consultation was submitted to the U.S. Fish and Wildlife Service (USFWS) on April 17, 2023. On June 16, 2023, the Service responded with no objection to Project development provided The USFWS Standard Protection Measures for the Eastern Indigo Snake are implemented. The USFWS Standard Protection Measures for the Eastern Indigo Snake (USFWS 2013) will be employed and enforced during construction to minimize impacts to this species.

Four state-listed threatened species occur or may occur within the Project area: Southeastern American kestrel (SEAK), gopher tortoise, Florida pine snake, and the short-tailed snake. The Southeastern American kestrel (SEAK), a threatened, non-migratory falcon, occurs within the Project area. FRP obtained a Florida Fish and Wildlife Conservation Commission (FWC) Incidental Take Permit (ITP) in November 2023 to allow for removal of one inactive nest cavity tree during the non-nesting season. FRP provided a financial contribution to FWC as compensatory mitigation. There will be temporary impacts to the gopher tortoise. Prior to construction, FRP will conduct a 100 percent burrow survey to support the submittal of a FWC gopher tortoise Conservation Relocation Permit application. FRP will excavate all burrows within 25 feet of the construction footprint, and captured tortoises will be safely relocated to an FWC-approved recipient site. If the Florida pine snake or short-tailed snake are located onsite during construction, FRP will relocate these species in accordance with FWC's Policy on the Relocation of Priority Commensals (FWC 2020).

Biological Resources – Bald and Golden Eagles/Migratory Birds
There are no bald eagles nesting within the Project or within one mile of the Project, per onsite field surveys and FWC data. The SEAK occurs within the Project and FRP obtained an FWC ITP in November 2023 to allow for removal of one inactive nest cavity tree during the non-nesting season. Other migratory avian species are likely to avoid the Project area during construction, and no adverse impacts are anticipated.

Biological Resources – Invasive Species
The Project primarily comprises row crops which limits the density of existing invasive plant species. While ground disturbance during initial site clearing may create a temporary increase in noxious weeds or invasive vegetation, FRP will revegetate graded areas as soon as feasible with a native ground cover seed mix appropriate for the geographic location, soil type, and season. If chemical control of noxious weeds is required, licensed applicators will be retained.

Cultural Resources and Historic Properties
A Phase I Cultural Resources Assessment Survey of the Project site was completed in April 2021. The survey was submitted to the Florida State Historic Preservation Office, The Coushatta Tribe of Louisiana, Miccosukee Tibe of Indians, Muscogee (Creek) Nation, Thlopthlocco Tribal Town, Ah-Ta-Thi-Ki Museum, and the Choctaw Nation of Oklahoma. The Florida Department of State, Division of Historical Resources (DHR) concurred with the findings of the report. No comments or concerns were received from any Tribes. If any inadvertent discoveries are found during construction, earthwork will cease, and the DHR and five federally recognized tribes will be contacted.

Aesthetics
There are no visually sensitive areas within or near the Project; therefore, no such resources will be affected. Construction will cause minor short-term and long-term impacts to aesthetics. A small portion of the Project (collector yard)

will be visible from SR 26 but is not expected to be intrusive and will be adjacent to an existing substation. After the arrays are constructed, they may be visible from neighboring residences located near the western portion of the Project. However, because the arrays are low-profile and will not obstruct view of the surrounding landscape, visual impacts are not considered significant. Additionally, the Project includes a perimeter vegetative landscape buffer, which reduces potential visual impacts to surrounding residences.

Air Quality
The Project area is in attainment and will not result in adverse impacts to air quality or exceed air quality standards. Emissions during the construction phase are expected to be temporary and minor. Implementation of BMPs, including soil stabilization and water trucks, will minimize fugitive dust generation. The solar array does not generate any emissions during operation; increasing reliance on renewable sources such as solar rather than fossil fuels to generate power may result in a foreseeable decrease in emissions of regulated pollutants over time.

Socio-Economic Impacts Assessment/Environmental Justice
The Project will have no adverse effects on minority or low-income populations within Gilchrist County. The Project is expected to have a positive regional and local effect, specifically through increased employment opportunities, economic benefits, and tax revenue. Temporary jobs will be created for contractors, foremen, electricians, and laborers during site construction. The Project will generate sales and use tax revenues through in-state expenditures, generating a positive impact on local businesses and economy during construction and operation. The Project will also create consistent electricity costs for SECI and its cooperatives over the life of the PPA.

Noise
Noise impacts may increase slightly during the construction phase but will be temporary, limited to daytime hours, and not expected to adversely affect sensitive offsite receptors. Construction will involve increased vehicular and truck traffic, heavy equipment, and portable installation equipment such as mechanical pile drivers. Once operational, the Project is not anticipated to increase ambient noise. The primary source of noise associated with operation of the Project will be from light vehicular traffic accessing the site during regular security and inspection activities.

Traffic and Transportation
The Project is expected to result in a temporary, short-term increase in traffic volumes during daytime hours on SR 26 and SE 80th Avenue due to the presence of workers, material and equipment deliveries, and the access/egress of heavy machinery or trucks. Street closures are not anticipated, and areas adjacent to the Project will remain open to property owners.

Human Health and Safety
A Phase I Environmental Site Assessment was performed for the solar site in July 2017 and the collector yard in April 2021 in accordance with the American Society for Testing and Materials (ASTM Standard Practice E1527-13 and the EPA All Appropriate Inquiry Rule for evaluation of commercial real estate. The assessments concluded that no Recognized Environmental Conditions (RECs) or Controlled RECs (CREC) were identified in connection with the site, by activities conducted on the site or by adjacent properties/activities. During construction, contractors will comply with all federal and state government and OSHA regulations. Workers will wear personal protective equipment, and standard OSHA recommended BMPs for safety will be implemented. Compliance with regulations and standard manufacturers'

protocols for storage, transportation, and use of any hazardous construction-related materials will be followed. Security fencing will remain in place throughout construction and operation of the Project. The public will not be allowed to enter the facility.

Climate Change/Greenhouse Gases
Solar panels and associated equipment will have an operating life of several decades; energy production that substitutes fossil fuels to meet the demand for electricity in Gilchrist County and surrounding communities is expected to reduce greenhouse gases and have a positive net benefit on climate change over time.

E. PUBLIC AND AGENCY INVOLVEMENT

Letters requesting comments from tribes and agencies were distributed during the preparation of the draft EA. Comments received were incorporated into the draft EA and were used to assist with the development of mitigation measures to ensure no significant adverse impacts to important resources. The availability of the EA for public review was announced on November 6, 7, and 8, 2023 in the Gainesville Sun, published in Alachua County, Florida, with circulation in Alachua and Gilchrist Counties. A 14-day comment period was announced in the local newspaper notices which ended on November 19, 2023. The EA was also available for public review at https://www.rd.usda.gov/resources/environmental-studies/assessments. RUS received no comments.

F. FINDING OF NO SIGNIFICANT IMPACT

Based on its EA, RUS has concluded the Project will have no significant impacts to existing land use, floodplains, wetlands, water resources, coastal resources, the surrounding community, air quality, noise, transportation, aesthetics, or human health and safety. The Project will have no effects on historic properties listed or eligible for listing on the National Register of Historic Places and no effects to federally listed species or designated critical habitat. The Project will not disproportionately affect minority or low-income populations.

In accordance with the National Environmental Policy Act, as amended (42 U.S.C. 4321 et seq.), the Council on Environmental Quality Regulations (40 CFR 1500-1508), and RD's Environmental Policies and Procedures (7 CFR Part 1970), RUS has determined that the environmental impacts of the Project have been adequately addressed and that no significant impacts to the quality of the human environment will result from construction and operation of the Project. Any final action by RUS related to the Project will be subject to, and contingent upon, compliance with all relevant federal and state environmental laws and regulations. Because RUS's action will not result in significant impacts to the quality of the human environment, RUS will not prepare an Environmental Impact Statement associated with the Project.

G. RUS LOAN REVIEW AND RIGHT OF ADMINISTRATIVE REVIEW

This FONSI is not a decision on a loan application and therefore not an approval of the expenditure of federal funds. Issuance of the FONSI and its notices concludes RUS's environmental review process. The ultimate decision on loan approval depends upon conclusion of this environmental review process in addition to financial and engineering reviews. Issuance of the FONSI and publication of notices will allow for these reviews to proceed. The decision to provide financial assistance also is subject to the availability of loan funds for the designated purpose in RUS's budget. There are no provisions to appeal this decision (i.e.,

issuance of a FONSI). Legal challenges to the FONSI may be filed in Federal District Court under the Administrative Procedures Act.

H. **APPROVAL**

This Finding of No Significant Impact is effective upon signature.

CHRISTOPHER MCLEAN

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For additional information on this FONSI and EA, please contact Robert Deems, Environmental Protection Specialist at Robert.Deems@usda.gov.