

FINDING OF NO SIGNIFICANT IMPACT

Coggon Solar Project and
Coggon Substation Expansion

Linn County, Iowa

RURAL UTILITES SERVICE

United States Department of Agriculture

Coggon Solar, LLC

Prepared by:

Environmental & Historic Preservation Division Staff

Rural Utilities Service

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A. INTRODUCTION

Coggon Solar, LLC (Coggon Solar) plans to submit a financing request to the U.S. Department of Agriculture (USDA) Rural Development's Rural Utilities Service (RUS) to construct the proposed Coggon Solar Project (project) in Linn County, Iowa. 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 Rural Development's NEPA implementing regulations, Environmental Policies and Procedures (7 CFR Part 1970).

After completing an independent analysis of an environmental report prepared by Coggon Solar 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 proposed project. RUS finds that the EA is consistent with federal regulations and meets the standards for an adequate assessment. Coggon Solar 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 proposed 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 AND NEED

The purpose of the project is to construct a commercial solar facility to generate and distribute PV solar energy, a clean renewable energy source, to the existing electrical grid within Central Iowa Power Cooperative's (CIPCO) service territory and meet CIPCO's commitment to providing its member cooperatives and their communities, including Linn County, cost-effective, safe, and reliable energy. Coggon Solar executed a Power Purchase Agreement (PPA) with CIPCO for 100% of the project's energy output for a 20-year term beginning in 2023, and development of the project is consistent with goals and objectives specific to alternative and renewable energy set forth in the Linn County Comprehensive Plan.

CIPCO has determined that expansion of the existing substation is needed to accommodate project interconnection, meet future energy demands on the existing electrical grid, and provide reliable, low-cost electricity to CIPCO's member cooperatives and customers.

RUS has reviewed the applicant's purpose and need for the project and determined that the proposal will meet present and future needs of Coggon Solar and CIPCO.

C. ALTERNATIVES EVALUATED

No Action Alternative

Under the No Action Alternative, RUS would not provide financial assistance to Coggon Solar and the proposed project would not be constructed. No changes to the existing Coggon Substation would occur. This alternative would not allow Coggon Solar to generate and distribute a clean source of renewable energy.

Proposed Action Alternative (Preferred Alternative)

Under the Preferred Alternative, RUS would consider financing the proposed project, and the Applicant would construct, operate, and maintain the Coggon Solar Project. As part of this project, CIPCO is proposing to expand the existing Coggon Substation by constructing a new 161 kV substation terminal.

The proposed project would utilize solar modules, mounted on a steel racking system which will be anchored into the ground using driven steel piles, which will minimize the need for extensive ground disturbance. Access to the project area will primarily be from Coggon Road (County Road D62), Sutton Road, and Linn/Delaware Road (County Road W63). Project access roads will be located around the perimeter and within the PV array to allow for project maintenance and operation following construction. For public safety and security purposes, the perimeter of the project will be surrounded by eight-foot-tall chain link fencing. Secure access gates will be installed, and an on-site monitoring system will be managed remotely. Coggon Solar executed a Power Purchase Agreement with CIPCO for 100% of the project’s energy output for a 20-year term beginning in 2023. The project is expected to operate for approximately 35 years from COD at which time it is anticipated the project will be decommissioned.

Alternatives Eliminated from Further Consideration

In addition to the No Action Alternative and Preferred Alternative, Coggon Solar considered other technology and siting alternatives, which are documented in the Alternatives section of the EA.

D. SUMMARY OF ENVIRONMENTAL IMPACTS

The analyses in the EA documented that the proposed project would have no adverse effects to land use, floodplains, wetlands, water resources, coastal resources, biological resources, cultural/historic resources, aesthetics, air quality, socioeconomics and environmental justice, noise, transportation, and 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, as summarized below. Coggon Solar is responsible for implementing these measures.

Resource	Impact Analysis
Land Use	The project area was rezoned from Agricultural Area (AA) to Agriculture/Renewable Energy (AA/RE) following approval by Linn County in January 2022. Therefore, the project is in compliance with local land use policies. Under the Preferred Alternative, up to 640 acres of agricultural land will be directly converted (i.e., taken out of production). There are no practicable alternatives to the Preferred Alternative; however, measures will be implemented to prevent soil erosion, protect topsoil, and replenish nutrients in the underlying soil for future agricultural use by minimizing grading and underplanting solar modules with a mix of low-growing native grasses and wildflowers intended to prevent erosion and habitat for pollinators. The project is expected to operate for up to 35 years, at which time, project facilities will be removed, and land could once again be used for the production of agriculture at the discretion of the landowner. No farmland will be impacted as a result of the proposed expansion of the Coggon Substation. No formally classified lands or airports would be adversely affected by the project.
Floodplain	The project area does not overlap with a 500-year floodplain; therefore, no effects to the 500-year floodplain will occur as a result of the project. Coggon Solar will coordinate with the appropriate federal, state and county offices to obtain applicable floodplain permits for up to one permanent stream crossing within the 100-year floodplain. No impacts to floodplains will occur as a result of the Coggon Substation expansion.

Resource	Impact Analysis
Wetlands	No direct (permanent or temporary) impacts to wetlands will occur as a result of construction or operation of the solar development. Given the avoidance measures implemented during project design, and the implementation of Best Management Practices (BMP) and a Stormwater Pollution Prevention Plan (SWPPP) in compliance with Iowa Department of Natural Resources (DNR) requirements, no reasonably foreseeable adverse indirect effects to wetlands will occur as a result of the Preferred Alternative. Approximately 0.14 acre of wetland will be impacted by the proposed substation expansion. All applicable permits will be obtained by CIPCO prior to substation construction.
Water Resources	Three stream crossings (two temporary, one permanent) are proposed as a result of the Preferred Alternative. All applicable permits will be obtained prior to construction. No streams will be impacted as a result of the proposed Coggon Substation expansion. No sole source aquifers are located within the state of Iowa; therefore, no effects to sole source aquifers will occur as a result of the Preferred Alternative. No adverse effects to the drinking water supply or the groundwater system are anticipated as a result of the project.
Coastal Resources	Coastal resources are not present within the project area; therefore, impacts to coastal resources will not occur as a result of the project.
Biological Resources – Fish, Wildlife and Vegetation	No long-term adverse effects to vegetation are anticipated as a result of the Preferred Alternative. The solar arrays will be sited entirely within cropped areas, with the exception of access road or collection line crossings of road ditches which have limited wildlife habitat value for those species that require grassland habitat. Impacts to aquatic resources as a result of proposed stream crossings is anticipated to be minor with the implementation of BMPs.
Biological Resources – Threatened and Endangered Species	The Preferred Alternative will not result in adverse impacts to federally listed threatened or endangered species based on the lack of suitable habitat.
Biological Resources - Migratory Birds and Bald Eagles	No significant adverse effects to MBTA species or the bald eagle are anticipated as a result of the Preferred Alternative.
Historic and Cultural Properties	The RUS initiated the formal Section 106 process with the Iowa SHPO on November 8, 2021 and submitted a letter indicating a Finding of No Adverse Effect to Historic Properties. This finding is contingent upon implementation of vegetative screening to avoid potentially adverse visual effects to historic properties. A response was received from the SHPO via email on December 8, 2021, indicating concurrence with the Finding of No Adverse Effect with Conditions (i.e., implementation of vegetation screening). A finding of No Historic Properties Affected was recommended for the Coggon Substation.
Aesthetics	The Preferred Alternative will result in changes to the visual aesthetics within and adjacent to the project area over the 35-year life of the project; however, no significant adverse effects are anticipated. No changes to the visual aesthetic of the Coggon Substation will occur as a result of the Preferred Alternative.
Air Quality	Temporary and localized impacts to air quality will occur as a result of project construction, including the Coggon Substation, as well as decommissioning of the solar development, under the Preferred Alternative. No new sources of air pollutants would be generated by

Resource	Impact Analysis
	project operation and maintenance. Therefore, no significant adverse effect to air quality is anticipated to occur as a result of the project.
Socioeconomic and Environmental Justice	No adverse effects to minority or low-income populations are expected as a result of the Preferred Alternative and no adverse effects were identified that will disproportionately impact minority or low-income populations.
Noise	No long-term or significant adverse effect to noise levels will occur as a result of the Preferred Alternative.
Transportation	No adverse effects to county or local roads or traffic patterns are anticipated as a result of the Preferred Alternative.
Human Health and Safety	No significant risks to human health and safety are anticipated as a result of the Preferred Alternative.

E. PUBLIC AND AGENCY INVOLVEMENT

Local newspaper notices announcing the availability of the EA, participation under Section 106 of the National Historic Preservation Act were published on September 22, 2022, September 23, 2022, and September 24, 2022, in The Gazette newspaper (Cedar Rapids, Iowa [Linn County]). The notices also disclosed the conversion of up to 640 acres of Important Farmland per U.S. Department of Agricultural Department Regulation 9500-3. A copy of the EA was available on the RUS project website at: <https://www.rd.usda.gov/environmentalstudy/coggon-solar-project-and-coggon-substation-expansion>.

The 14-day public review ended on October 7, 2022. RUS received no public comments.

F. FINDING OF NO SIGNIFICANT IMPACT

Based on its EA, RUS has concluded that the proposed project would have no significant effects to the human environment as disclosed in the EA. The proposed 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 proposed project would not disproportionately affect minority or low-income populations.

In accordance with the NEPA, as amended (42 U.S.C. 4321 et seq.), the CEQ Regulations (40 CFR 1500–1508), and Rural Development’s Environmental Policies and Procedures (7 CFR Part 1970), RUS has determined that the environmental impacts of the proposed project have been adequately addressed and that no significant impacts to the quality of the human environment would result from construction and operation of the proposed project. Any final action by RUS related to the proposed 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 for its potential federal action associated with the proposed 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’ 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 FONSI is in effect upon signature:

Dated:

CHRISTOPHER MCLEAN

Assistant Administrator
Electric Program
Rural Utilities Service

Contact Person:

For additional information on this FONSI and EA, please contact Elisa Albury, elisa.albury@usda.gov