

APPENDIX K
PRIME FARMLAND CONSULTATION



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October 7, 2021

Jennifer Smith
State Soil Scientist
Natural Resources Conservation Service
8030 Excelsior Drive, Suite 200
Madison, Wisconsin 53717-2906

SUBJECT: Request for Farmland Conversion Impact Rating – Badger State Solar Project

Dear Ms. Smith,

AECOM is working with the United States Department of Agriculture (USDA), Rural Utility Service (RUS) (Peter Steinour, 202-961-6140) in the preparation of an Environmental Impact Statement associated with the construction of a 149 megawatt (MW) solar farm located in Jefferson County, Wisconsin. The proposed project would include two development alternatives, the 1,750 acre alternative (Figure 1) and the 1,200 acre alternative (Figure 2). The Badger State Solar Project would consist of 127,752 single-axis tracking PV panels. The proposed collector substation would be located within the project area. Should the Project be constructed, Dairyland Power Cooperative (Dairyland Power) would purchase the power generated by the facility under a Power Purchase Agreement with Badger State Solar, LLC.

USDA RUS is in the process of conducting investigations and preparing the National Environmental Policy Act (NEPA) compliance documentation for the proposed Project. This documentation will include a comprehensive analysis of pertinent environmental impacts, including prime or unique farmlands, and an analysis of Project alternatives. This letter is being submitted under the provisions of the Farmland Protection Policy Act.

Enclosed is Form AD-1006, the Farmland Conversion Impact Rating Form, with Parts I, III, VI, and VII completed and a map showing soil types and farmland classification of the proposed Project site (Figures 3 and 4). To ensure compliance with the Farmland Protection Policy Act and to support the NEPA process, USDA RUS requests that the USDA Natural Resources Conservation Service review the enclosed project-specific information and complete Parts II, IV, and V on the enclosed Form AD-1006. USDA RUS staff will also forward to your office, a copy of the draft NEPA document, when it is available for distribution, along with a request for comments.

If you have any questions regarding this proposed Project, please contact me at 719-323-8646 (carol.freeman@aecom.com) or Peter Steinour at 202-961-6140 (peter.steinour@usda.gov).

Sincerely,

AECOM Technical Services, Inc.

Carol Freeman
Deputy Project Manager

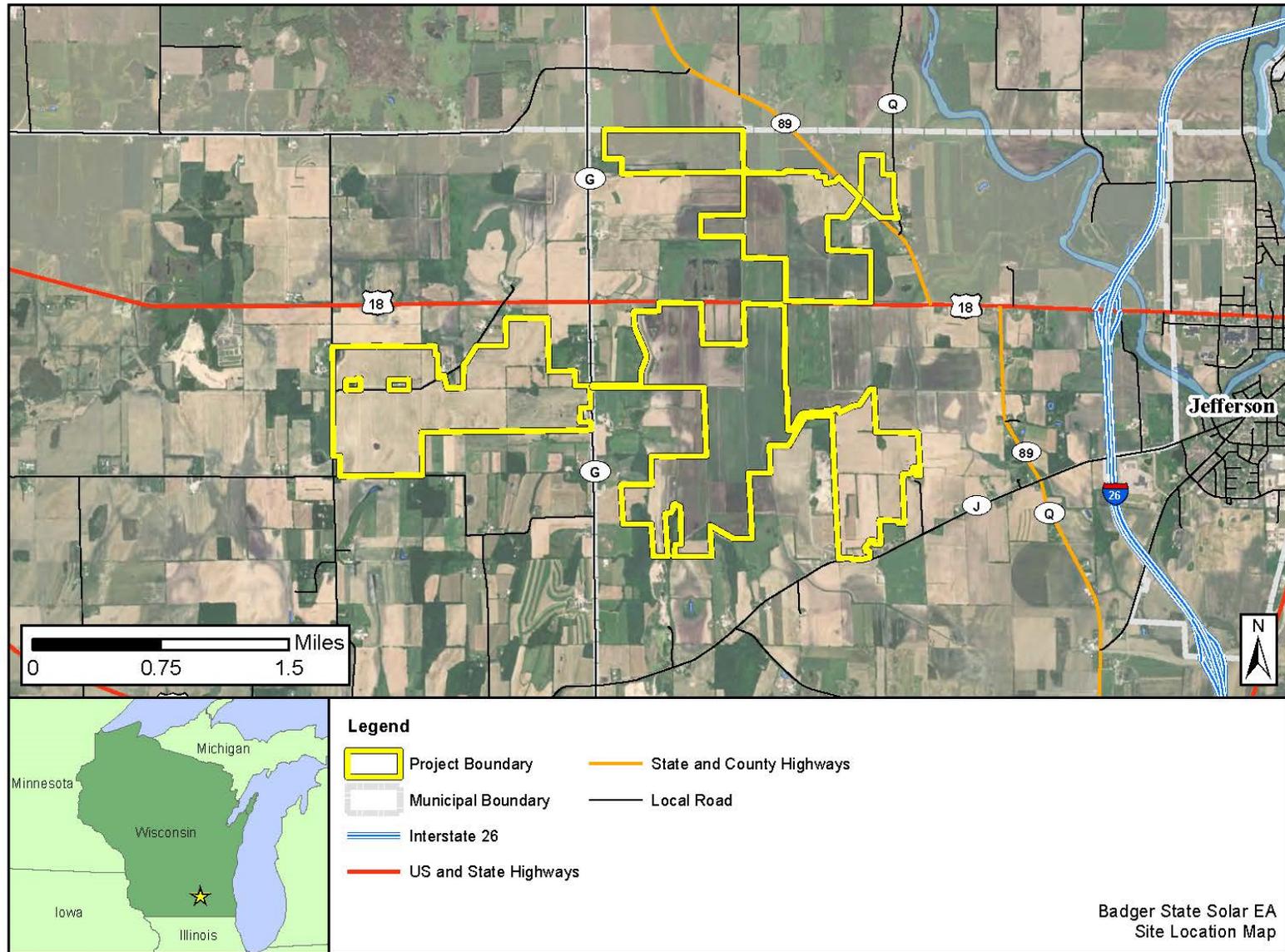


Figure 1. Proposed 1,750 Acre Badger State Solar Project Site (Site A)

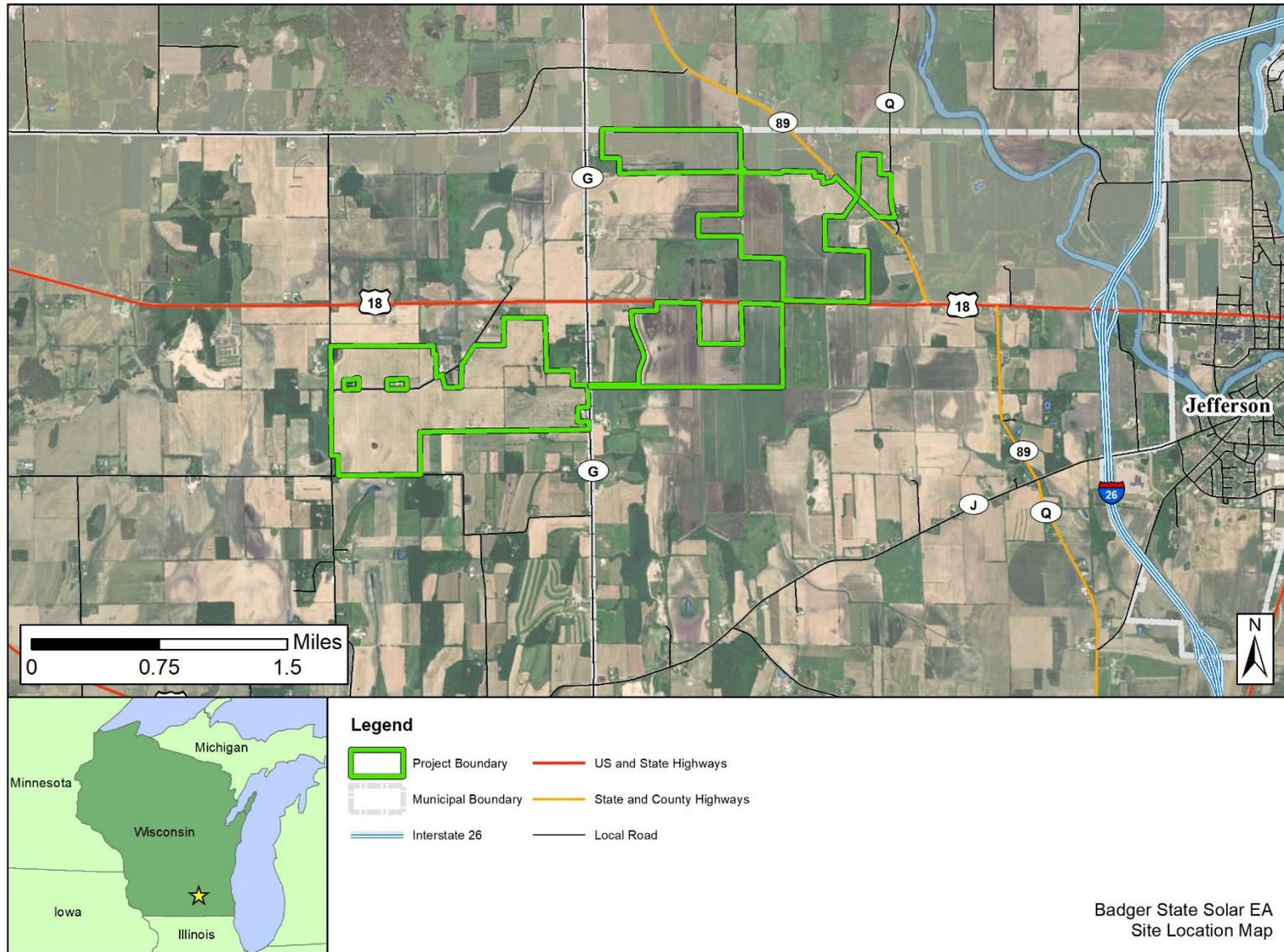


Figure 2. Proposed 1,200 Acre Badger State Solar Project Site (Site B)

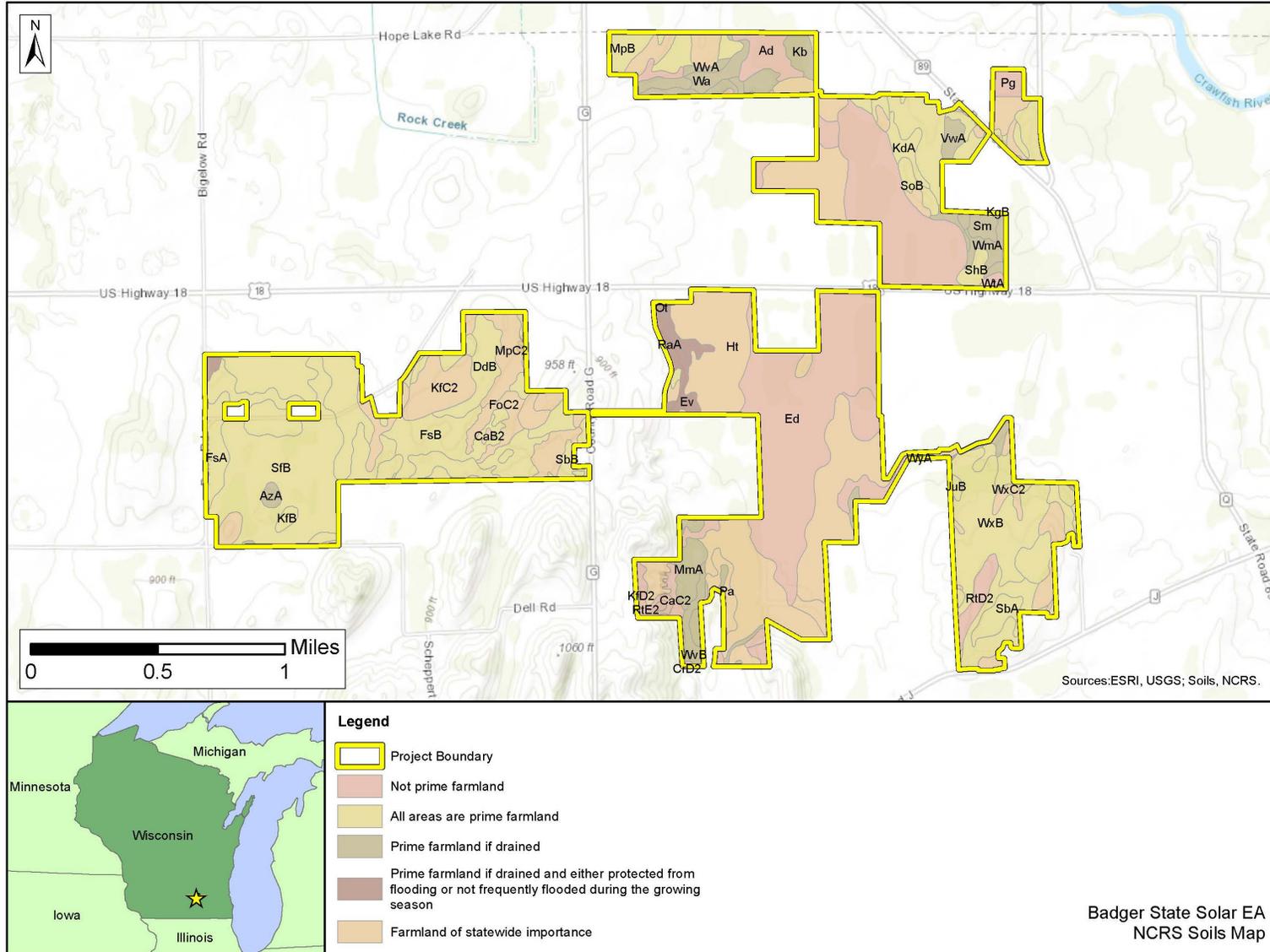


Figure 3. Prime Farmland Soils at the Proposed Badger State Solar Project Site A

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request			
Name of Project		Federal Agency Involved			
Proposed Land Use		County and State			
PART II (To be completed by NRCS)		Date Request Received By NRCS		Person Completing Form:	
Does the site contain Prime, Unique, Statewide or Local Important Farmland? <i>(If no, the FPPA does not apply - do not complete additional parts of this form)</i>		YES <input type="checkbox"/>	NO <input type="checkbox"/>	Acres Irrigated	Average Farm Size
Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %		Amount of Farmland As Defined in FPPA Acres: %		
Name of Land Evaluation System Used	Name of State or Local Site Assessment System		Date Land Evaluation Returned by NRCS		
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly					
B. Total Acres To Be Converted Indirectly					
C. Total Acres In Site					
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland					
B. Total Acres Statewide Important or Local Important Farmland					
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted					
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value					
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)					
PART VI (To be completed by Federal Agency) Site Assessment Criteria <i>(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)</i>		Maximum Points	Site A	Site B	Site C
1. Area In Non-urban Use		(15)			
2. Perimeter In Non-urban Use		(10)			
3. Percent Of Site Being Farmed		(20)			
4. Protection Provided By State and Local Government		(20)			
5. Distance From Urban Built-up Area		(15)			
6. Distance To Urban Support Services		(15)			
7. Size Of Present Farm Unit Compared To Average		(10)			
8. Creation Of Non-farmable Farmland		(10)			
9. Availability Of Farm Support Services		(5)			
10. On-Farm Investments		(20)			
11. Effects Of Conversion On Farm Support Services		(10)			
12. Compatibility With Existing Agricultural Use		(10)			
TOTAL SITE ASSESSMENT POINTS		160			
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100			
Total Site Assessment (From Part VI above or local site assessment)		160			
TOTAL POINTS (Total of above 2 lines)		260			
Site Selected:	Date Of Selection	Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>			
Reason For Selection:					
Name of Federal agency representative completing this form:					Date:

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

- Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006. The Land Evaluation and Site Assessment (LESA) process may also be accessed by visiting the FPPA website, <http://fppa.nrcs.usda.gov/lesa/>.
- Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s) of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The USDA Office Information Locator may be found at http://offices.usda.gov/scripts/ndISAPI.dll/oip_public/USA_map, or the offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)
- Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days.
- Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.
- Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.
- Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form and return the form with the final selected site to the servicing NRCS office.
- Step 7 - The Federal agency providing financial or technical assistance to the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

(For Federal Agency)

Part I: When completing the "County and State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them or other major change in the ability to use the land for agriculture.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities planned build out capacity) that will cause a direct conversion.

Part VI: Do not complete Part VI using the standard format if a State or Local site assessment is used. With local and NRCS assistance, use the local Land Evaluation and Site Assessment (LESA).

1. Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, power line and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.
2. Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule after submitting individual agency FPPA policy for review and comment to NRCS. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications or Mitigation).

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, convert the site assessment points to a base of 160.

Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \times 160 = 144 \text{ points for Site A}$$

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 10/07/2021			
Name of Project Badger State Solar		Federal Agency Involved USDA Rural Utility Service			
Proposed Land Use Solar Farm		County and State Jefferson County, Wisconsin			
PART II (To be completed by NRCS)		Date Request Received By NRCS 10/7/2021		Person Completing Form: Jeremy Ziedler	
Does the site contain Prime, Unique, Statewide or Local Important Farmland? <i>(If no, the FPPA does not apply - do not complete additional parts of this form)</i>		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		Acres Irrigated _____ Average Farm Size 70	
Major Crop(s) Cash Grain		Farmable Land In Govt. Jurisdiction Acres: 342497 % 91.9		Amount of Farmland As Defined in FPPA Acres: 276394 % 74.1	
Name of Land Evaluation System Used LESA		Name of State or Local Site Assessment System LESA		Date Land Evaluation Returned by NRCS 10/15/2021	
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly		1750	1200		
B. Total Acres To Be Converted Indirectly		0	0		
C. Total Acres In Site		1750	1200		
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland		1100	800		
B. Total Acres Statewide Important or Local Important Farmland		350	200		
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted		.006	.004		
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value		.005	.003		
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)		62	69		
PART VI (To be completed by Federal Agency) Site Assessment Criteria <i>(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)</i>		Maximum Points	Site A	Site B	Site C
1. Area In Non-urban Use		(15)	15	15	
2. Perimeter In Non-urban Use		(10)	10	10	
3. Percent Of Site Being Farmed		(20)	20	20	
4. Protection Provided By State and Local Government		(20)	0	0	
5. Distance From Urban Built-up Area		(15)	10	10	
6. Distance To Urban Support Services		(15)	10	10	
7. Size Of Present Farm Unit Compared To Average		(10)	10	10	
8. Creation Of Non-farmable Farmland		(10)	10	10	
9. Availability Of Farm Support Services		(5)	5	5	
10. On-Farm Investments		(20)	5	5	
11. Effects Of Conversion On Farm Support Services		(10)	2	2	
12. Compatibility With Existing Agricultural Use		(10)	0	0	
TOTAL SITE ASSESSMENT POINTS		160	97	97	0
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100	62	69	0
Total Site Assessment (From Part VI above or local site assessment)		160	97	97	0
TOTAL POINTS (Total of above 2 lines)		260	159	166	0
Site Selected: Site B		Date Of Selection _____		Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>	
Reason For Selection: Site B avoids other resources and has a more optimal location based on site planning.					
Name of Federal agency representative completing this form: _____					Date: _____



October 15, 2021

Larry Neal
Senior Project Manager, Environmental
10 Patewood Drive
Bldg 6, Suite 500
Greenville, South Carolina 29615

SUBJECT: Badger State Solar Project

The Natural Resources Conservation Service (NRCS) staff has reviewed the above plan with respect to requirements of the Farmland Protection Policy Act (FPPA). The purpose of the Farmland Protection Policy Act (FPPA) ,as you are aware, is to minimize the extent that federal programs contribute to the unnecessary and irreversible conversion of prime and important farmland to non-agricultural uses. The FPPA requires federal agencies involved in projects that may convert farmland to determine whether the proposed conversion is consistent with the FPPA. Upon reviewing the project, your project is subject to FPPA. I have completed the NRCS portion of the AD-1006 from.

Thank you for the opportunity to comment on this proposed project. If you have any questions or future projects in need of review, please feel free to contact me.

Regards,

 Digitally signed by
JEREMY ZIEGLER
Date: 2021.10.15
12:37:04 -05'00'

Jeremy Ziegler
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