

December 13, 2016

Ms. Paige Morris  
North Carolina Department of Commerce  
Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4325


**Re: SCH File # 17-E-4600-0216; Amended Application of Pecan Solar, LLC for Certificate to construct a 74.9 MW Solar Photovoltaic Electric Generating Facility in Northampton Co. Docket #SP-5273, Sub 0.**

Dear Ms. Morris:

The above referenced environmental impact information has been reviewed through the State Clearinghouse under the provisions of the North Carolina Environmental Policy Act.

Attached to this letter are additional comments made in the review of this document. The attached comments should be taken into consideration in project development.

Sincerely,

  
Crystal Best

State Environmental Review Clearinghouse

Attachments  
cc: Region L

**NORTH CAROLINA STATE CLEARINGHOUSE  
DEPARTMENT OF ADMINISTRATION  
INTERGOVERNMENTAL REVIEW**

COUNTY: NORTHAMPTON

H11: ENERGY RELATED  
FACILITIES/ACTIVITIES

STATE NUMBER: 17-E-4600-0216  
DATE RECEIVED: 10/11/2016  
AGENCY RESPONSE: 11/07/2016  
REVIEW CLOSED: 11/10/2016

MR JOSEPH HUDYNIA  
CLEARINGHOUSE COORDINATOR  
DEPT OF AGRICULTURE  
1001 MSC - AGRICULTURE BLDG  
RALEIGH NC

**REVIEW DISTRIBUTION**

DEPT OF AGRICULTURE  
DEPT OF ENVIRONMENTAL QUALITY  
DEPT OF NATURAL & CULTURAL RESOURCE  
DEPT OF TRANSPORTATION  
DNCR - DIV OF PARKS AND RECREATION  
DPS - DIV OF EMERGENCY MANAGEMENT  
UPPER COASTAL PLAIN COG

**PROJECT INFORMATION**

APPLICANT: North Carolina Department of Commerce  
TYPE: State Environmental Policy Act  
Environmental Review

DESC: Amended Application of Pecan Solar, LLC for Certificate to construct a 74.9 MW Solar Photovoltaic Electric Generating Facility in Northampton Co. Docket #SP-5273, Sub 0. - View document at <http://starw1.ncuc.net/NCUC/portal/ncuc/page/Dockets/portal.aspx>, Type SP-5273 Sub 0 in the Docket Number search line.

Located east and west of Bethel Church Road approximately .6 to 2 miles north of the intersection of Bethel Church Road and Highway 186 in an unincorporated area approximately 2 miles east of Seaboard, NC

Amended due to the additional land added to the facility site.

CROSS-REFERENCE NUMBER: 17-E-4600-0070

The attached project has been submitted to the N. C. State Clearinghouse for intergovernmental review. Please review and submit your response by the above indicated date to 1301 Mail Service Center, Raleigh NC 27699-1301.

If additional review time is needed, please contact this office at (919)807-2425.

AS A RESULT OF THIS REVIEW THE FOLLOWING IS SUBMITTED: ☐ NO COMMENT ☒ COMMENTS ATTACHED

SIGNED BY: \_\_\_\_\_

DATE: 11/23/2016

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Dec 13 2016

RECEIVED  
Secretary's  
NOV 20 2016  
Office  
DOA



Dr. Richard Reich  
Assistant Commissioner

North Carolina Department of Agriculture  
and Consumer Services  
*Agricultural Services*

Joseph Hudyncia  
Environmental Programs

Crystal Best  
State Clearinghouse  
N.C. Department of Administration  
1301 Mail Service Center  
Raleigh, North Carolina 27699-1301

November 23, 2016

Dear Ms. Best:

The proposed Photovoltaic Electric Generating Facility has the potential to negatively impact agricultural/environmental/economic balance in the immediate area. The NCDA&CS discourages taking agricultural or managed forestland out of production. Far too much productive farmland has been, and continues to be, lost to development of various types in North Carolina. As farmland is taken out of production the associated jobs and potential for producing food and fiber for a growing population is reduced, and with it a substantial amount of associated economic activity generated by farming dollars that contributes revenue to the local economy and beyond year after year.

Prioritization of potential sites for solar development on this tract based on site agricultural productivity potential may help mitigate impacts of solar development on the agriculture sector. If implementation of the solar project moves forward on this tract of land, we encourage conservation of highly productive soils for their best use, i.e. agriculture, and we encourage the developer to place solar installations on less productive sites located on this tract if possible.

Additionally, if development of the project proceeds, the use of best practices in construction and maintenance of the facility are encouraged to insure that the productive capabilities of the land for any future agricultural activity is maintained and the integrity of unique or sensitive habitats is not destroyed. It is also recommended that a decommissioning plan that clearly defines the responsible party, process, time-line, and specific responsibilities (including restoration to prior condition) is incorporated.

We have cross-referenced the parcel for existing easements related to agriculture and found no CREP conservation easements, swine buyout easements, ADFP easements, plant conservation easements or plant conservation priority sites on the subject property.

Respectfully,

Joseph Hudyncia  
Environmental Programs  
NCDA&CS