

APPENDIX K
PRIME FARMLAND CONSULTATION



AECOM
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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

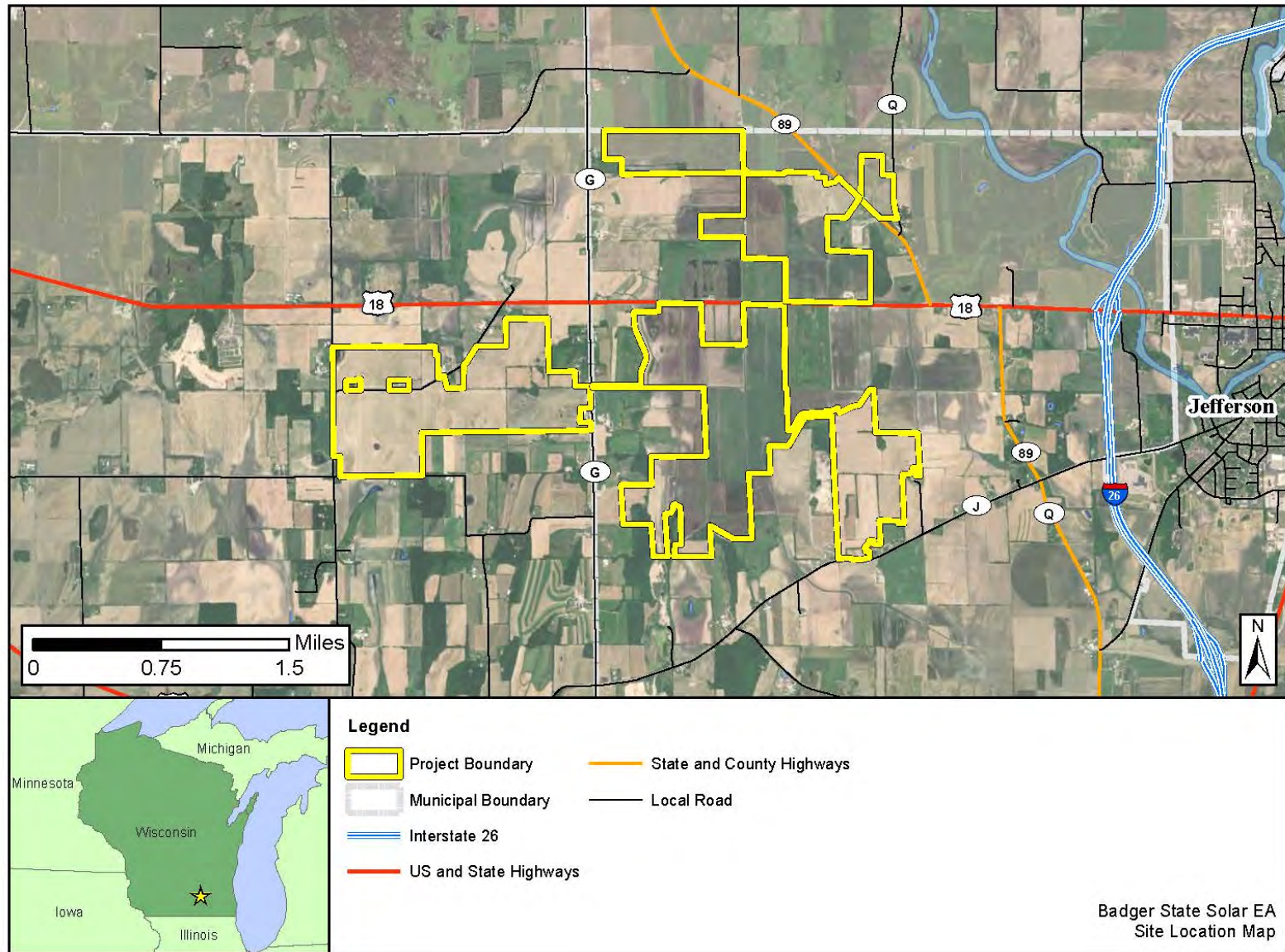


Figure 1. Proposed 1,750 Acre Badger State Solar Project Site (Site A)

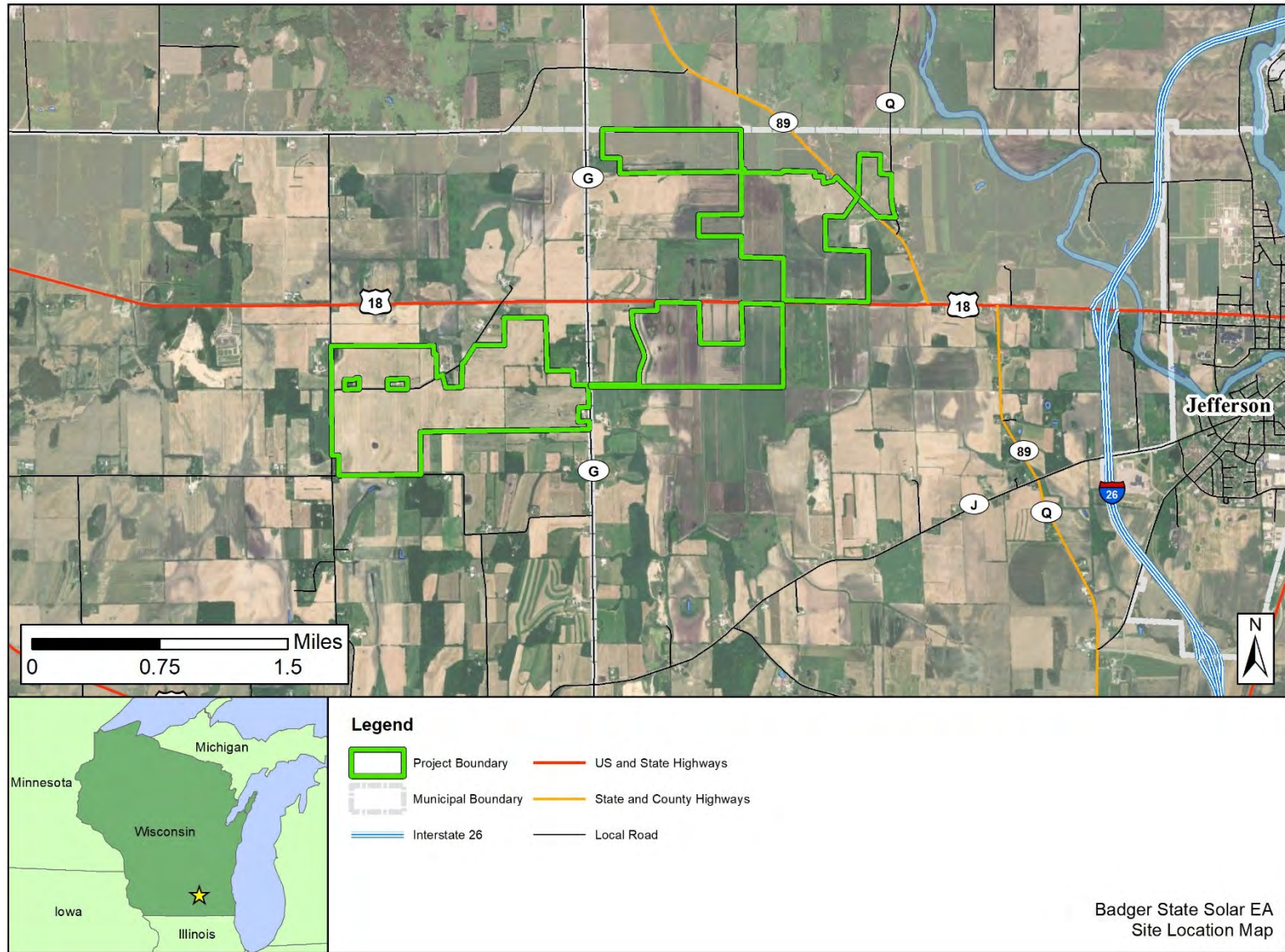


Figure 2. Proposed 1,200 Acre Badger State Solar Project Site (Site B)

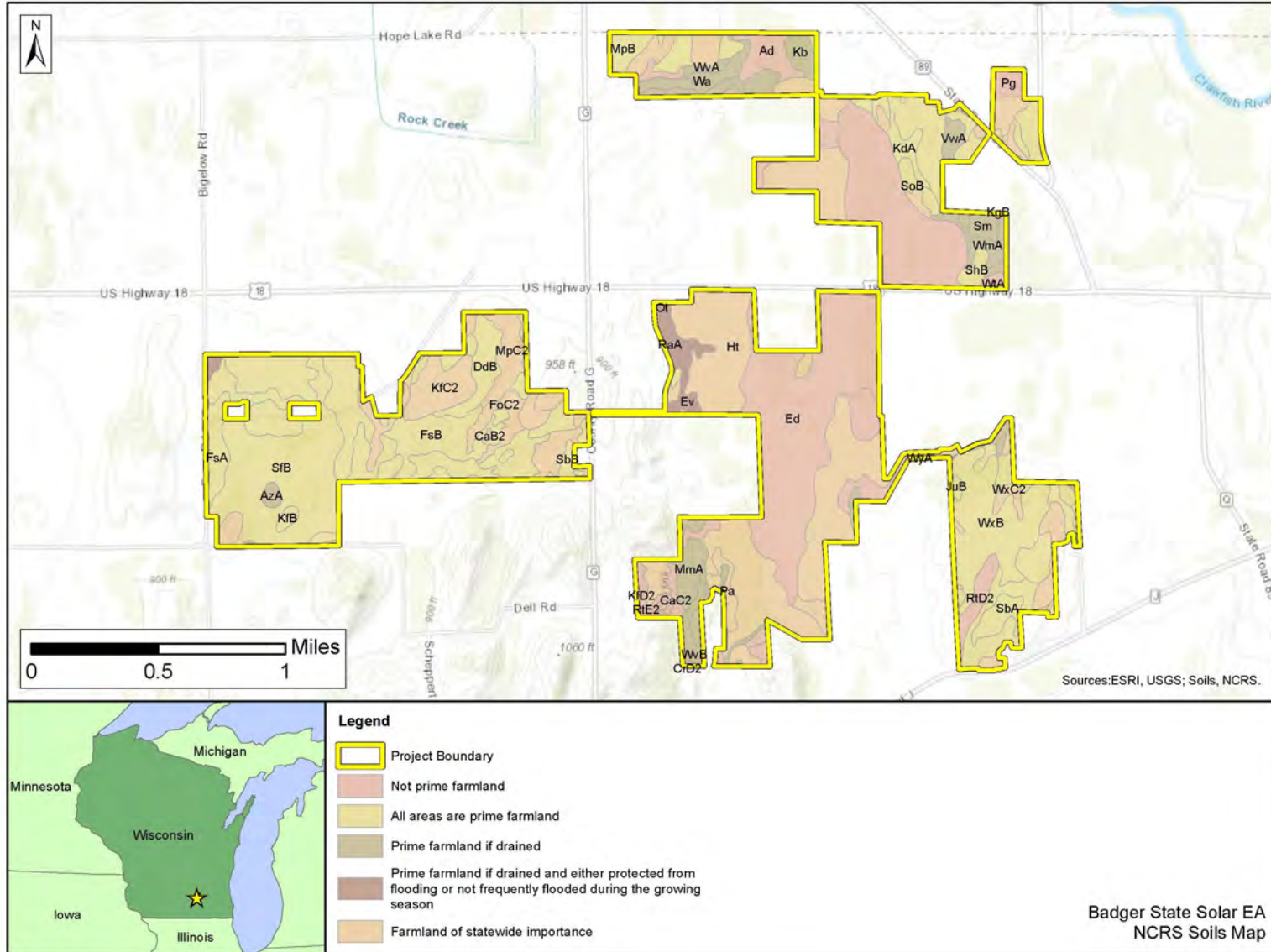


Figure 3. Prime Farmland Soils at the Proposed Badger State Solar Project Site A

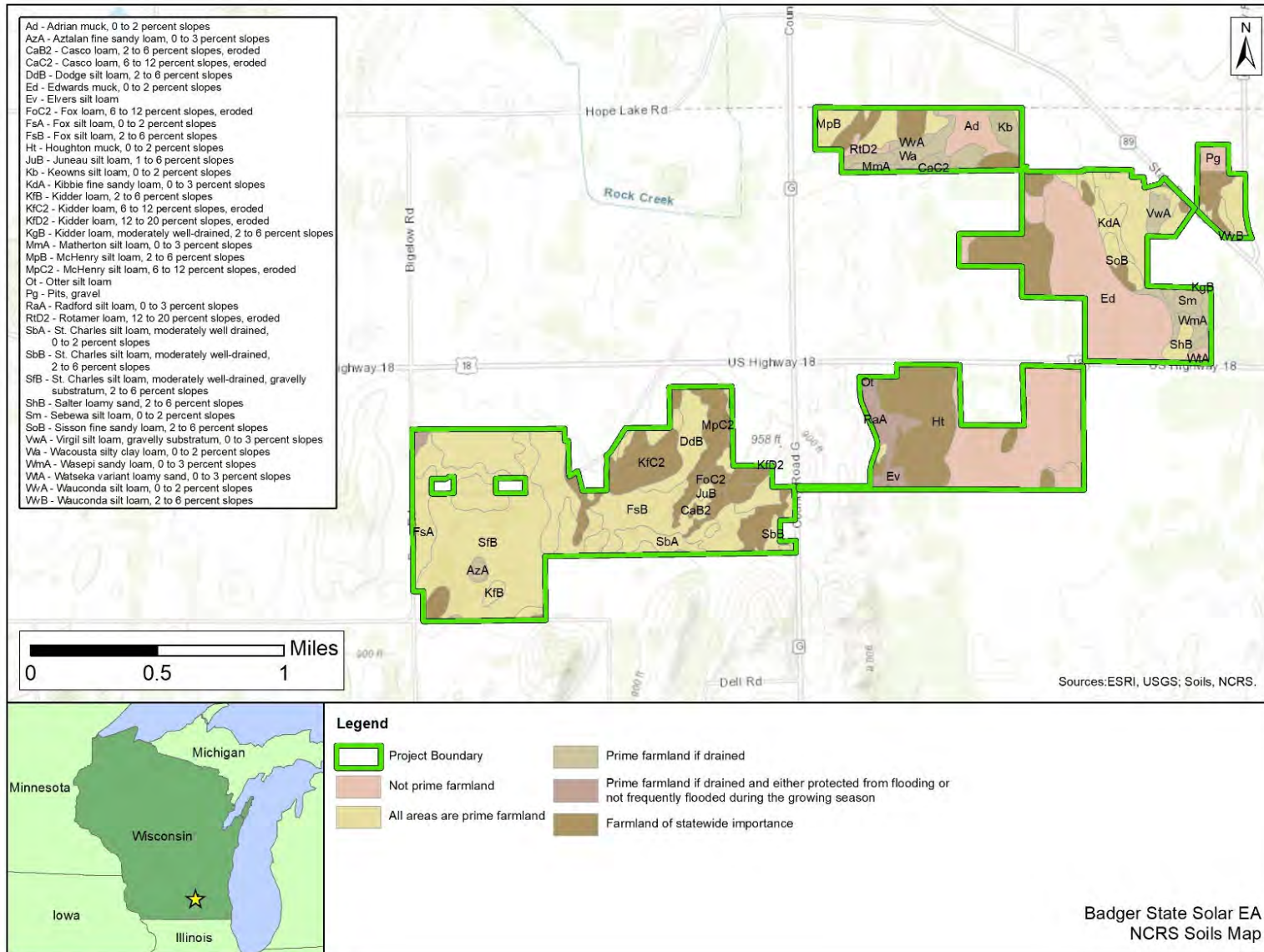


Figure 4. Prime Farmland Soils at the Proposed Badger State Solar Project Site B

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:

(See Instructions on reverse side)



October 15, 2021

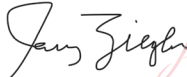
Larry Neal
Senior Project Manager, Environmental
10 Patewood Drive
Bldg 6, Suite 500
Greenville, South Carolina 29615

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
NRCS-USDA
Area Resource Soil Scientist
451 West North Street
Juneau, WI 53039
GOV Cell 920-210-9007
Office:920-709-3022

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: Jeremv 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)	20	20	
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)	18	18	
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	130	130	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	130	130	0
TOTAL POINTS (Total of above 2 lines)		260	192	199	0
Site Selected: Site B		Date Of Selection _____		Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Reason For Selection: Jefferson County Site B avoids other resources and has a more optimal location based on site planning.					
Name of Federal agency representative completing this form: Carol Butler Freeman				Date: 07/05/2022	



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February 17, 2022

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 – Additional Alternative Sites for the 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 Badger State Solar Project would consist of 487,848 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

A previous letter dated October 7th, 2021, was sent and included a description of the proposed project which included two development alternatives (1,750-acres and 1,200-acres in size). The Badger State Solar project is adding three additional alternative sites for consideration. These three alternative sites include the 1,199-acre Cambridge site (Figure 1), the 1,325-acre Rockland site (Figure 2), and the 1,518-acre Root River site (Figure 3).

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 and III completed and a map showing soil types and farmland classification of the three proposed additional sites (Figures 1, 2, and 3). 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

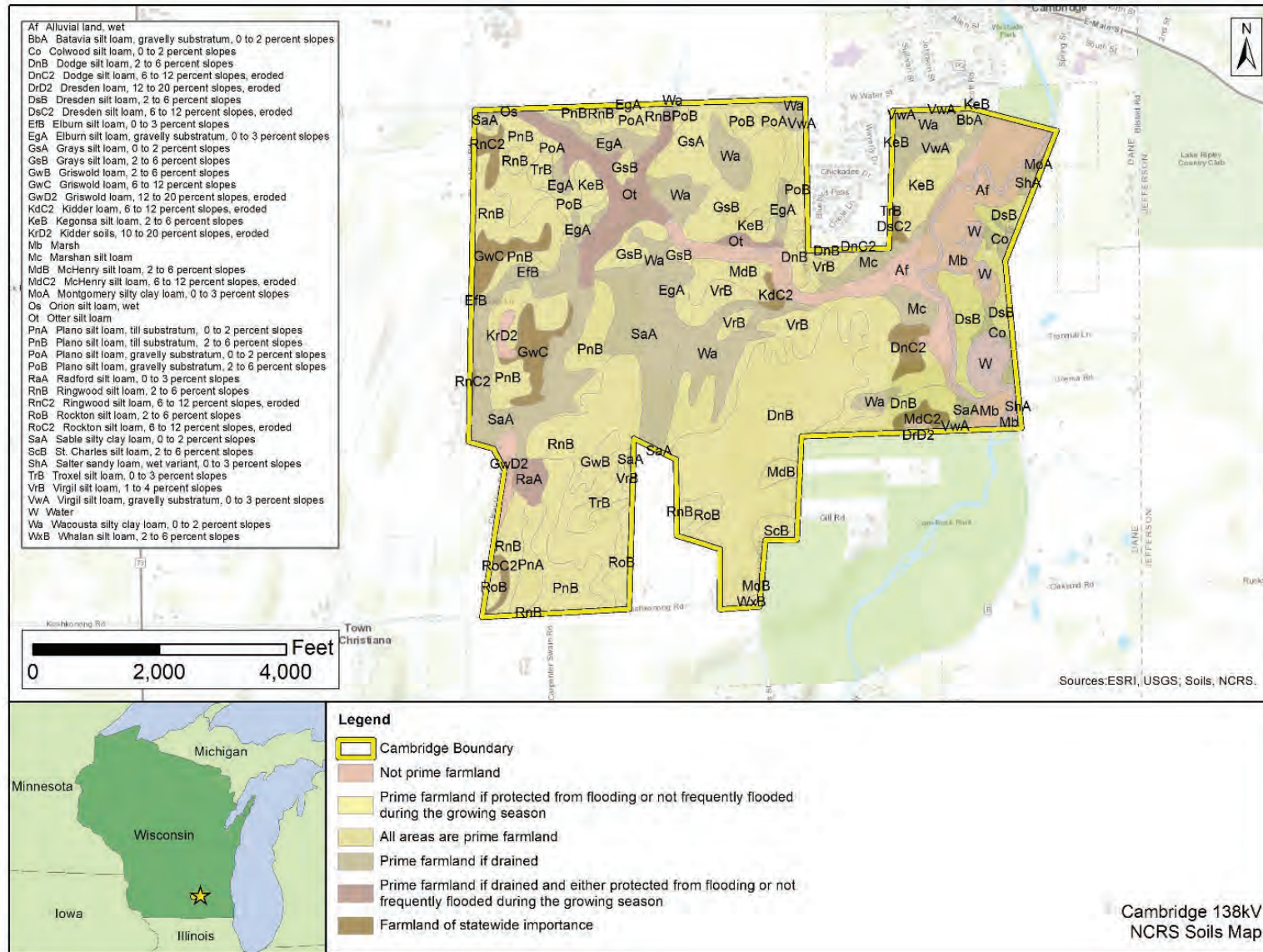


Figure 1. Prime Farmland Soils at the 1,199 Acre Cambridge Proposed Badger State Solar Project Additional Alternative Site.

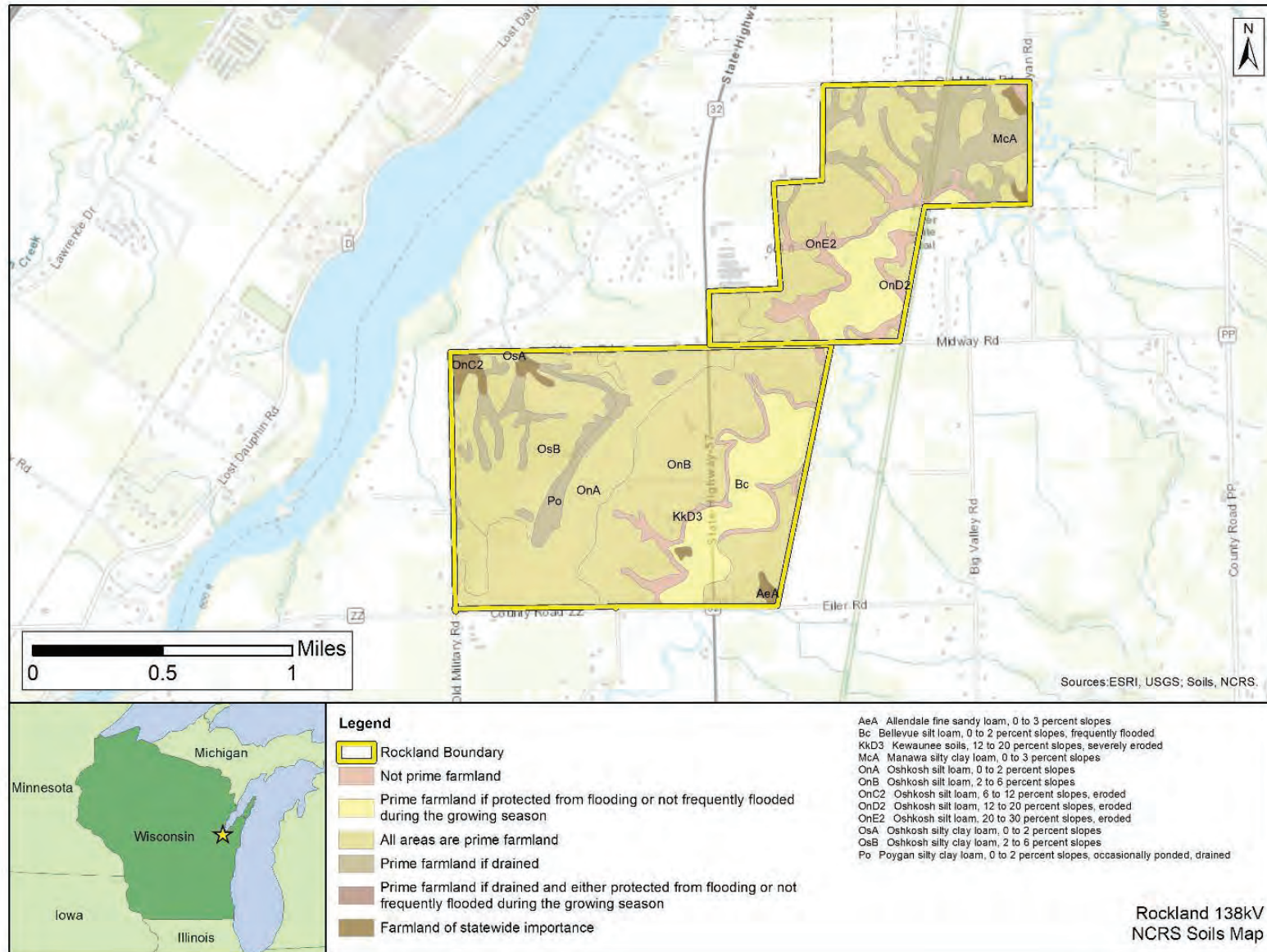


Figure 2. Prime Farmland Soils at the 1,325 Acre Rockland Proposed Badger State Solar Project Additional Alternative Site.

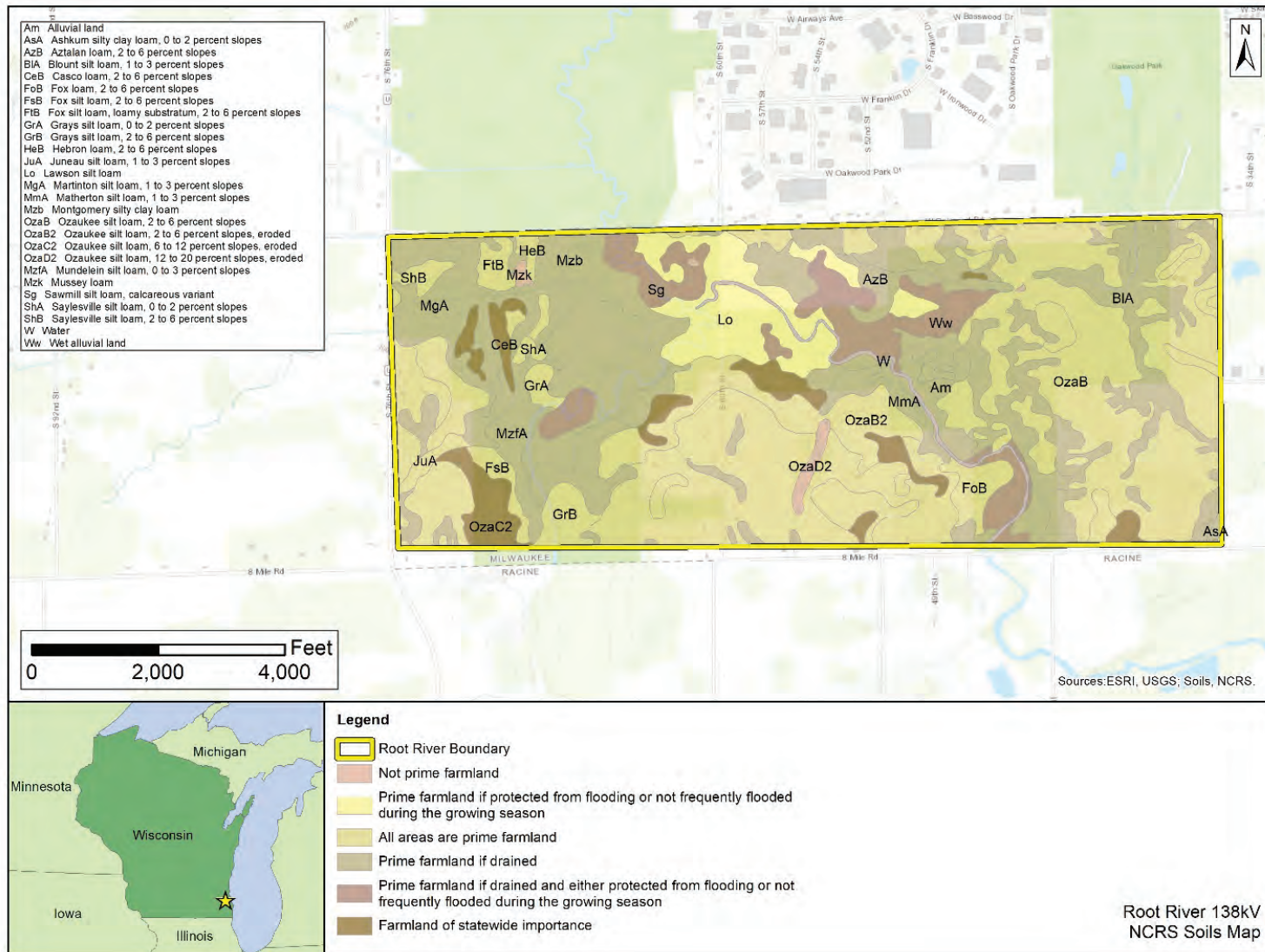


Figure 3. Prime Farmland Soils at the 1,518 Acre Root River Proposed Badger State Solar Project Additional Alternative Site.

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 02/01/2022				
Name of Project Badger State Solar		Federal Agency Involved USDA Rural Utility Service				
Proposed Land Use Solar Farm		County and State Dane, Wisconsin				
PART II (To be completed by NRCS)		Date Request Received By NRCS 2/18/22		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	
Major Crop(s) Cash Grain	Farmable Land In Govt. Jurisdiction Acres: 685967% 86.49	Amount of Farmland As Defined in FPPA Acres: 58213% 73.40				
Name of Land Evaluation System Used LESA	Name of State or Local Site Assessment System	Date Land Evaluation Returned by NRCS 2/24/2022				
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		1199				
B. Total Acres To Be Converted Indirectly		0				
C. Total Acres In Site		1199				
PART IV (To be completed by NRCS) Land Evaluation Information						
A. Total Acres Prime And Unique Farmland		792.7				
B. Total Acres Statewide Important or Local Important Farmland		10.7				
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted		.1461				
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value		60.42				
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)		62				
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	Site D
1. Area In Non-urban Use		(15)	15			
2. Perimeter In Non-urban Use		(10)	9			
3. Percent Of Site Being Farmed		(20)	20			
4. Protection Provided By State and Local Government		(20)	20			
5. Distance From Urban Built-up Area		(15)	5			
6. Distance To Urban Support Services		(15)	0			
7. Size Of Present Farm Unit Compared To Average		(10)	10			
8. Creation Of Non-farmable Farmland		(10)	10			
9. Availability Of Farm Support Services		(5)	5			
10. On-Farm Investments		(20)	18			
11. Effects Of Conversion On Farm Support Services		(10)	3			
12. Compatibility With Existing Agricultural Use		(10)	0			
TOTAL SITE ASSESSMENT POINTS		160	115	0	0	0
PART VII (To be completed by Federal Agency)						
Relative Value Of Farmland (From Part V)		100	62	0	0	0
Total Site Assessment (From Part VI above or local site assessment)		160	115	0	0	0
TOTAL POINTS (Total of above 2 lines)		260	177	0	0	0
Site Selected: Jeff. County Site B		Date Of Selection	Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>			
Reason For Selection: Jefferson County Site B avoids other resources and has a more optimal location based on site planning.						
Name of Federal agency representative completing this form: Carol Butler Freeman					Date: 07/05/2022	

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 02/01/2022			
Name of Project Badger State Solar		Federal Agency Involved USDA Rural Utility Service			
Proposed Land Use Solar Farm		County and State Brown, Wisconsin			
PART II (To be completed by NRCS)		Date Request Received By NRCS 2/18/22		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	
Major Crop(s) Cash Grain		Farmable Land In Govt. Jurisdiction Acres: 265671% 76.11		Amount of Farmland As Defined in FPPA Acres: 245036% 70.20	
Name of Land Evaluation System Used LESA		Name of State or Local Site Assessment System		Date Land Evaluation Returned by NRCS 2/24/2022	
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			1325		
B. Total Acres To Be Converted Indirectly			0		
C. Total Acres In Site			1325		
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland			1037.1		
B. Total Acres Statewide Important or Local Important Farmland			4.3		
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted			.4844		
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value			27.09		
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)			78		
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	
2. Perimeter In Non-urban Use		(10)		10	
3. Percent Of Site Being Farmed		(20)		20	
4. Protection Provided By State and Local Government		(20)		20	
5. Distance From Urban Built-up Area		(15)		10	
6. Distance To Urban Support Services		(15)		7	
7. Size Of Present Farm Unit Compared To Average		(10)		10	
8. Creation Of Non-farmable Farmland		(10)		10	
9. Availability Of Farm Support Services		(5)		5	
10. On-Farm Investments		(20)		18	
11. Effects Of Conversion On Farm Support Services		(10)		3	
12. Compatibility With Existing Agricultural Use		(10)		0	
TOTAL SITE ASSESSMENT POINTS		160	0	128	0
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100	0	78	0
Total Site Assessment (From Part VI above or local site assessment)		160	0	128	0
TOTAL POINTS (Total of above 2 lines)		260	0	206	0
Site Selected: Jeff. County Site B		Date Of Selection		Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Reason For Selection: Jefferson County Site B avoids other resources and has a more optimal location based on site planning.					
Name of Federal agency representative completing this form: Carol Butler Freeman				Date: 07/05/2022	

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 02/01/2022			
Name of Project Badger State Solar		Federal Agency Involved USDA Rural Utility Service			
Proposed Land Use Solar Farm		County and State Milwaukee, Wisconsin			
PART II (To be completed by NRCS)		Date Request Received By NRCS 2/18/22		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	
Major Crop(s) Cash Grain		Farmable Land In Govt. Jurisdiction Acres: 397292 % 75.2		Amount of Farmland As Defined in FPPA Acres: 37833 % 71.6	
Name of Land Evaluation System Used LESA		Name of State or Local Site Assessment System		Date Land Evaluation Returned by NRCS 2/24/2022	
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				1518	
B. Total Acres To Be Converted Indirectly				0	
C. Total Acres In Site				1518	
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland				1275	
B. Total Acres Statewide Important or Local Important Farmland				74.9	
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted				.3446	
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value				54.61	
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)				60	
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)			12
2. Perimeter In Non-urban Use		(10)			7
3. Percent Of Site Being Farmed		(20)			20
4. Protection Provided By State and Local Government		(20)			20
5. Distance From Urban Built-up Area		(15)			0
6. Distance To Urban Support Services		(15)			0
7. Size Of Present Farm Unit Compared To Average		(10)			10
8. Creation Of Non-farmable Farmland		(10)			10
9. Availability Of Farm Support Services		(5)			5
10. On-Farm Investments		(20)			18
11. Effects Of Conversion On Farm Support Services		(10)			3
12. Compatibility With Existing Agricultural Use		(10)			0
TOTAL SITE ASSESSMENT POINTS		160	0	0	105
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100	0	0	60
Total Site Assessment (From Part VI above or local site assessment)		160	0	0	105
TOTAL POINTS (Total of above 2 lines)		260	0	0	165
Site Selected: Jeff County Site B		Date Of Selection		Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Reason For Selection: Jefferson County Site B avoids other resources and has a more optimal location based on site planning.					
Name of Federal agency representative completing this form: Carol Butler Freeman				Date: 07/05/2022	