

## Gabe Rusk

---

**From:** Underwood, Eileen <Eileen.Underwood@ct.gov>  
**Sent:** Monday, April 22, 2024 1:35 PM  
**To:** Gabe Rusk; Solar, AGR; Smith, Jaime  
**Cc:** Jean-Paul LaMarche; Michael Monaco  
**Subject:** RE: Forested Prime Farmland Solar Development Meeting Request

[External Sender]

Good afternoon Gabriel,

The regulation pertaining to solar development of prime farmland is based on soils, not current usage. Once a formal application has been submitted, we would then be happy to review and discuss further. All updated requirements can be found on our [website](#), please let me know if you have any additional questions.

Kind Regards,  
Eileen



**Eileen Underwood**  
**Environmental Analyst II**  
Connecticut Department of Agriculture  
Phone: 860-819-0580  
[eileen.underwood@ct.gov](mailto:eileen.underwood@ct.gov)

---

**From:** Gabe Rusk <gabe.rusk@greenskies.com>  
**Sent:** Friday, April 19, 2024 3:40 PM  
**To:** Solar, AGR <AGR.Solar@ct.gov>; Smith, Jaime <Jaime.Smith@ct.gov>; Underwood, Eileen <Eileen.Underwood@ct.gov>  
**Cc:** Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>; Michael Monaco <michael.monaco@greenskies.com>  
**Subject:** Forested Prime Farmland Solar Development Meeting Request

Some people who received this message don't often get email from [gabe.rusk@greenskies.com](mailto:gabe.rusk@greenskies.com). [Learn why this is important](#)

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Good afternoon,

We have a project on prime farmland soils that is in a forested area. The area has never been farmed, and we believe it may not be suitable for farming. We were wondering if it might be possible to set up a meeting to discuss the site, and the requirements for developing the project.

Kind Regards,

Gabriel Rusk  
Project Developer  
Greenskies  
127 Washington Ave, West Bldg, Lower Level, North Haven, CT 06473  
[www.greenskies.com](http://www.greenskies.com)



### **Jeremy Hill Proposed Agricultural Co-use Plan**

Although Greenskies Clean Energy chose not to secure the endorsement of the Connecticut Department of Agriculture, Greenskies is committed to an Agricultural Co-use of the Project site, and is working with the landowner who is an experienced farmer to establish an agricultural course of the project. As the current site is not an active farm and has not been in 50 years, the proposed project will actually increase the amount of prime farmland being actively used for agriculture and be more protective of the soils than the current use. There will be no negative impact to production agriculture from the proposed project. The new use outlined below will be a change in use but will not reduce the amount of acreage in service of agriculture and will not harm soils in any way.

The landowner intends to farm the property, and Greenskies Clean Energy is working with the landowner to identify restorative land management strategies and agricultural activities including the grazing of fowl, the planting of perennial cold season grasses, or perennial herbaceous plants.

GCE and the landowner are in agreement that the land owner, Devon Point farms, will be the Primary farmer in the solar array at the time that the Stormwater permit is completed and the farming activities take place. All farming and fowl management responsibility will be provided by the landowner. Expected fowl options include geese/ducks, turkeys, chicken, pheasants and quail.

At a very high level, maintenance may include the following:

- Delayed mowing, which would ensure that the selected plants can reach harvest stage and flowering stage and provide nutritional value to the pollinators and fowl
- Harvesting of agricultural products of plants and fowl
- Overseeding as needed to maintain sufficient land coverage of plants
- Removal of invasive plants as needed
- General monitoring and upkeep of the soil and plant health
- General care of fowl

A mix of pollinator friendly flowers, nitrogen fixing plants, and grasses is proposed within the project boundary fence line. This use will protect the soils and replenish them for future agricultural use once the solar project components are removed.

Potential herbaceous plants being considered are purslane, white clover, red clover, rosemary, thyme, yarrow and lavender. Allowing these plants to grow for years will improve soil health and maintain prime farmland soils. The deep roots of the perennial plants will improve water infiltration to the soils. Water will be provided via an underground well.

In addition to the farming aspect of this project, the solar electric facility will be designed in such a way that it will enable the successful implementation of the proposed farming activities. The project is being designed to accomplish this goal through three specific attributes:

- 1) The lowest point of the solar modules will be raised higher than is needed for solar only to allow for increased sunlight to the area below the modules as well as increased accessibility for farmers. The leading edge of the modules will be a minimum of 3feet, but at places will be higher depending on topography.
- 2) The spacing in between rows is being designed to allow for sufficient acreage to grow plants, provide sufficient area of high sunlight levels, and provide workability for farmers while again balancing needs of required solar capacity. The current design has a row to row spacing of 6.5 feet. These rows will be on a single mount tracker modules aligned north to south, which will maximize available sunlight for plants to grow.
- 3) The site is being designed with farmer's and fowl's safety in mind. All electrical feeders will be either secured to the modules/racking directly or be underground. There will be increased signage and fencing to ensure that farm workers are never exposed to unsafe conditions.

Soil health is improved by using restorative methods and perennial plants. Use of perennial plants reduces negative impact to soils, keeps living roots in the ground, provides year round ground cover, and increases the absorption of water into soils. This approach also increases the micro and fungal biodiversity of the soil which improves its quality and the ability to nourish plants grown in the soil.

Greenskies also wants to make clear that there will be no grading or earthmoving on site for the installation of the solar project. The only exception to this is that a small amount of earthwork will need to be completed in very limited locations to install the stormwater control basins that are required to satisfy the Connecticut State General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities.