

## Proposed Agricultural Co-use Plan

There will be no negative impact to production agriculture from the proposed project. The new use, the creation of a solar project with perennial plant, specifically herb or natural dye farming, 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.

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. Chris Stone from DEEP can confirm this statement as well.

The slopes of the project are between 0% and 10% and multiple sediment traps and stormwater basins are being proposed. We fully intend to maintain the 100ft setbacks from the solar panels, as well as the required 50ft setbacks from the edge of disturbance to wetland areas. The proposed project will require a stormwater permit, and GCE intends to fulfil all requirements of the permit. The requirements of the approval required by DEEP are for the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities and the specific solar requirements are defined in Appendix I.

Greenskies Clean Energy proposes soil friendly land management of a Solar + Farming project through 1) planting of perennial plants (natural dye or herbs) that would be harvested and sold, 2) planting of perennial cold season grasses and pollinator friendly flowers. At a very high level, maintenance would 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
- Harvesting of agricultural products of plants
- 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

A mix of natural dye plants or herbs, 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. Greenskies is in conversations with an experienced natural dye farmer who has successfully cultivated and extracted natural dye. This farmer is helping Greenskies to identify a dye plant hardy enough to reliably grow in Connecticut, as well as develop plans to keep the crop well watered, healthy, and maximize dye production. Greenskies has also discussed the possibility of supplementing the natural dye crop with perennial herbaceous plants in the event that the natural dye plants do not take in early years.

Potential plants being considered are: mint, oregano, rosemary, thyme, lavender, marigold, elderberry, and indigo. 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. Greenskies is also considering planting supplemental plants such as: purslane, red clover, yarrow and lavender.

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 3.5 feet, but at places will be higher depending on topography. This minimum clearance was established based on prior experience with seeing improved sunlight for ground crops at that higher height, needing to balance the required strength of the racking system, and in connection to the row spacing and required production level for the solar project.
- 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. 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 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. Usually, at this stage of development, Greenskies has not yet selected an engineering, procurement, and construction (EPC) contractor, nor has Greenskies finalized its site design. Both of these activities would ordinarily take place in a project's development cycle after the initial round of permitting is completed. Nonetheless, Greenskies is developing this project with farming as a long term integral aspect of the project and is committed to having the farming use be parallel with the solar for the life of the project.

To further provide confidence that an established agriculture use will take place, Greenskies has a backup plan in the case that the primary plan is no longer able to function for any reason. The secondary farming use of the site is sheep grazing. In the event that perennial plant farming is not a viable option for this project, Greenskies will, instead, provide for sheep grazing at the project site. The project design aspects that enable the natural dye farming use will also enable the project to accommodate sheep grazing. Not every detail of the grazing requirements will be listed in this letter, but the sheep grazing will generally be performed within the previously provided for in the April of 2023 guidance from the

Department of Agriculture: Requirements for Solar Grazing Properties. Sheep grazing will be rotational to ensure that the carrying capacity of the site is not exceeded and that soil health is maintained improved by the existence of sheep on the site. The key points to the proposed grazing activities are as follows:

1. Proper site preparation will be completed
2. Proper soil preparation will take place
3. Disclosure of any herbicides/pesticides used on site will be made
4. Site will be securely fenced
5. Interior areas will be fenced appropriately
6. Proper protection of livestock will be required of farmer
7. Site will have proper signage
8. Livestock health and wellness will be a priority and ensured by both farmer and solar project owner

9. Employees that access the site will have education on grazing and animals

Greenskies has and will continue to develop relationships with sheep farmers and shepherds that can be deployed to this proposed project in the event that the original Solar + Farming proposal is found to be untenable.

Soil health is improved by using regenerative 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 is putting forward this project because it believes that it represents one of the best ways that solar and agriculture can co-exist. Traditional row cropped agriculture is one option, but is not the right approach for many sites, including this one. A more natural form of agriculture, such as the one being proposed here, is, we believe, one of the best approaches to allowing agricultural activities to exist with renewable energy projects.