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March 31, 2023

Melanie A. Bachman Executive Director Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: Petition NO. 1323 – Sheep Grazing Plan

Dear Melanie,

I am writing to request that the Connecticut Siting Council (CSC) allow as part of the D&M plan, the use of sheep to maintain the vegetation within the limits of the approved solar facility located at 134 Bilton Road, Somers. Windham Solar LLC (Windham) has been operating and maintaining the facility in accordance with the approved D&M plan, however, in an effort to further utilize green methods it is our desire to implement a sheep grazing plan.

Windham has been working with Vineyard Sky Farms Corp. (VSF) to establish the assets and the plans to effectively maintain the solar facility. The VSF Livestock Manager has visited the site and has worked with several consultants to develop a meaningful and real grazing plan. A site specific grazing plan has been attached for review.

The utilization of sheep will aid Windham in our efforts to further benefit the environment by not relying on mechanical means to maintain the vegetation at the solar facility. Thank you in advance for considering this request.

Thank you,

Rodney A. Galton

Bilton Solar Grazing Plan Somers, CT

Melissa Staebner

Asset and Livestock Manager

Vineyard Sky Farms – Bozrah, CT

Melissa.Staebner@VineyardSkyFarms.com

Bilton Solar Grazing

Bilton Solar Grazing is Somers, CT has 27.65 fenced area with a well-established forage base for 3 years. The forage base is very suitable for sheep grazing with an excellent mix of clovers, orchard grass, rye grass, fescue flowering forbes and pollinator friendly plants. The site has a very low weed population. Grazeable acres are 16.5. The roadways, ponds and catch basins are eliminated from the grazable area as are the newer seeded areas. The site has been mowed and in 2021 lime and fertilizer was spread with a spring and fall application as per the recommendations from the soil consultant using the soil analysis report.

Objective

Maintain desirable vegetative ground cover on the site in a condition that will reduce erosion, and limit storm runoff. Controlling the vegetative growth under and around the panels within the solar site will be done utilizing sheep. Sheep will effectively prevent panel shading, maintain diverse forage populations, improve opportunity for flowering forb and plants increasing pollination. Additionally, sheep will produce natural fertilization to improve organic matter and soil quality.

Background Information/Considerations:

Coordinating and managing of solar grazing with sheep requires flexibility and adjustments to properly maintain an ecologically balanced living environment. For planning purposes and actual conditions may require changes or allowances to properly maintain a healthy environment, as well as maintain the health of the flock.

Soils, Site Characteristics, Ground Cover

Soils can vary widely within a solar site which impacts the potential production of available feed. Other conditions that can affect soils are drainage, compaction, root depth and organic matter.

- Soil Analysis was completed in November of 2020 to determine the health of the soil.
- Utilizing a soil consultant liming and fertilizer was applied prior to the grazing season and during the fall season. Sites will be resampled every two years to address soil pH and other nutrient limitations.

Site characteristics are also considered before grazing including slope, topography, catch basins and ponds within the site. Areas with steep slopes, ponds and catch basins are subject to erosion and will not be grazed. Additionally, sheep will not have access to roadways, inverter, or transformer pads.

Ground cover is well established and rooted (3 years) and contains a mixture of orchard grass, red and white clover, fescue, rye grass, forbs and other herbaceous flowering and pollinator friendly plants (as per agronomist evaluation) November 2020. Ideal growing conditions in Connecticut would encompass a grazing season from late April through October but is dependent on temperatures, rainfall, and other weather issues. Additionally, forage production may vary

within the site do to soil quality, drainage and other stressors which may limit the amount and quality forage production.

<u>Grass Growth:</u> The rate of growth and vegetative conditions will fluctuate during the growing season. Early spring generally provides lush new growth and an abundance of forage. During summer generally there is a slower regrowth because of excessive heat and lack of precipitation. Some plants and forage species can enter a dormant phase during a drought. These conditions will require flexibility and adjustments in stocking rates and or frequency of grazing areas with limitations. The Somer's site has two separate areas referred to as the Area 1 and Area 2. The forage seeding was completed at different times so the Area 1 has a more established well rooted base (as per soil consultant). The Area 2 has a good cover and in time will be the same. Lime and fertilizer were applied in the spring and fall of 2021 as per recommendations of the Uconn Soil Analysis Laboratory (see attachments).

Rotational Grazing Management Plan

Utilizing rotational grazing on a solar site is an excellent method and practice to reduce soil erosion, increase moisture retention in the soil, and develops plant root systems thus improving the forage production and quality.

This system involves managing the solar site (farm) using portable fences and creating paddocks/ smaller areas or units within the site. Sheep are confined to each paddock for a period, monitoring the plant height and grazing to insure that over grazing doesn't occur. The sheep are moved to a new paddock (determined by plant height). The original paddock is in a rest period to regrow. This allows the regrowth and grass to recover – generally in spring the rest/recovery time is faster than in late summer and fall. Several major factors impact the length of time for regrowth including weather, soil condition and forage base. Depending on the size of paddock, stocking density and forage base will determine the rotation schedule. Rotations can range from daily to weekly depending on the site. The period is chosen by the flock manager after daily observations and inspections. The length of stay for the sheep within a paddock is basically determined by start and stop grazing heights of the plants and overall availability of forage and flock health. Daily monitoring is done for forage amount and quality, as well as flock health.

<u>Fence</u> – Vineyard Sky Farms has selected Premier Electro-Net Fence with a solar powered battery for creating the paddocks. The panel arrangements and infrastructure will dictate the paddock sizes and dimensions. Signage will indicate grazing sheep on exterior fencing and electric fence will be posted. Fence lines will be trimmed periodically to insure proper functioning. Fence lines will be walked daily to check security. Exterior fencing is eight feet tall chain link with a ground wire.

<u>Water</u>— Sheep will have access to clean fresh water daily via 50 gallon holding troughs. Water will be transported daily to the site from the barn via a 250-gallon tank.

<u>Animal Health</u> - Prior to taking the sheep to the site all sheep will be inspected for body condition and physical soundness. The following protocols will occur to insure proper transitioning to the solar site.

- 1. All sheep will transition to a limited grain diet and consume dry hay one week prior.
- 2. Make sure sheep are exposed to electric fence 2 weeks prior to site
- 3. Sheep will remain in the bedded pack to monitor health
- 4. Hooves will be trimmed 1 month prior to going to site
- 5. Sheep will be shorn 2 weeks prior to moving to the site
- 6. Vaccinations or booster shots will be given 1 month prior going to site
- 7. Fecal samples will be taken to determine if worming is necessary before going on site
- 8. Tail banding and castration of lambs will be done 6 weeks prior to going on site
- 9. Sheep will be weighed prior to day of transporting to site

On Site Sheep Monitoring

- 1. Daily monitoring and counting sheep numbers, visual evaluation of flock
- 2. Body condition scoring will be weekly to evaluate overall health and nutrition of flock
- 3. Water Check and Fill daily
- 4. Worming if indicated by fecal matter samples
- 5. Mineral supplement blocks placed strategically near water under cover replenish on an as need basis to ensure sheep are getting vitamin and minerals requirements throughout the grazing season.

Grazing Sheep – Vineyard Sky Farms

Breed: Dorpers-require less feed to maintain condition, non-selective grazers able to do well in a range of different types and quality of feed, fast growth, strong instinct to flock when predators come.

<u>Groups available for grazing</u> – not all groups will graze at Bilton/Somers

Description	Number of Ewes Available
Mature Ewes > 3 years old	21
Mature Ewes < 3 years old	24
Yearling Ewes	31
Lambs < 1 year	32

Bilton/Somers Solar Site Stocking Rate

12 grazable acres X 4 adult sheep per acre = 48 (Maximum for our purpose we would use a lower rate to prevent overgrazing 40)

Stocking Rate - is the number of sheep per acre (grazeable) of the entire solar unit. A general rule of thumb is 4 ewes per acre, ewe/lamb pairs 3 per acre. Flock Managers need flexibility to manage the stocking rate and the rest periods between grazed paddocks.

These stocking rates are based on forage balance availability that has appropriate vegetative covers and species for sheep grazing, as well as good soil and drainage to endure the grazing season April-October.

**Early season when grass is growing fast adjustments will be made to stocking rate and forage management may be necessary. **

Paddock Identification and Size

Paddock Number	Description	Acres
1	Area 1	6
2	Area 2	6

• Additional Area is grazable within the site but has not had a long enough time to establish and is across the main roadway.

Estimate the Forage Demand

The forage demand is the amount of forage weight on a dry matter basis (DM) required for the flock per day. Sheep consume in dry matter about 3.5% of their body weight per day.

Number of Adult Sheep 40 X175 (average lbs.) = X .035 = lbs. daily flock requirement (Dorper weights may be higher). Groups with a higher avg. weight will be adjusted accordingly and may require more feed.

** Actual number of sheep on site and per paddock will be determined by visual evaluation and consultation with the soil/agronomy consultant. Forage evaluation, sampling will be done during the spring, summer and fall seasons.

Lime will be applied prior to the sheep grazing (early spring) and after the sheep come off (late fall) as per the soil consultant's recommendation of 400lbs. of pelletized lime per acre.

The applications of lime will be to improve the soil pH which will help increase the availability of other nutrients to improve the sustainability of the forage.

Estimate the Forage Supply

Estimated forage supply is the amount of forage dry matter predicted to be available for grazing per acre. Numbers will fluctuate depending on season, rainfall, and other uncontrollable factors. The numbers presented are for broad planning purposes. Adjustment will be made evaluating and measuring sites at specific times and rotations.

<u>Use 800 of DM/ac. Available unless forage is measured on site – this site has a good forage base</u>

Area 1 and Area 2 Have same acreage -800 lbs. DM \times 6.0 acres = 4800 lbs. available DM / 300 DM daily requirement for 40 ewes

MAXIMUM DAYS = 16 Both Paddocks will be evaluated daily to make sure there is no overgrazing.

More frequent rotation will have positive effects on the forage plant growth. Soil tests on the Area 1 indicate a more desirable pH and higher organic matter levels. This may lend itself to a longer period of grazing.

Sheep stocking rate will be adjusted based on continued measuring and evaluation of the forage growth.

References and Consultants

<u>University of Maine Cooperative Extension – Solar Farm Grazing Best Management Practices</u>
(BMP) for Sheep – August 2021

American Solar Grazing Association Member Webinars, solargrazing.org – daily updates/info

Uconn Soil Nutrient Analysis Laboratory http://www.soiltest.uconn.edu
Helena Chemical Company – Andrew Hukowicz, Applicator/Seed Specialist

David Postemski – Crop and Soil Consultant – Lebanon, CT



UConn Soil Nutrient Analysis Laboratory

6 Sherman Place, Unit 5102, Union Cottage Storrs, CT 06269-5102 860-486-4274

www.soiltest.uconn.edu



PLANT SCIENCE AND LANDSCAPE

Soil Test Report

Prepared For:

Melissa Staebner 104 Blue Hill Road Bozrah, CT 06334

mjstaebner@gmail.com 336.469.3131

Sample Information:

Order Number: 13561

Sample Name: BiltonSCR#1 Lab Number: 9280

Area Sampled:

Received:

11/12/2020 Reported: 11/18/2020

Results

Nutrients Extracted From Your Soil (Modified Morgan)

		Below Optimum	Optimum	Above Optimum	Excessive*
Calcium	1228 lbs/acre				
Magnesium	215 lbs/acre				
Phosphorus	10 lbs/acre				
Potassium	183 lbs/acre				

* Excessive only defined for Phosphorus (>40 lbs/acre)

Soil pH (1:1, H2O)		5.7	Element	<u>ppm</u>	Soil Range in CT
Est. Cation Exch. Capacity		9.5	Boron (B)	0.2	0.1 - 2.0
(cmole+/100g)		7.5	Copper (Cu)	0.1	0.3 - 0.8
% Organic Matter		5.5	Iron (Fe)	7.4	1.0 - 40.0
		6.1	Manganese (Mn)	2.8	3.0 - 20.0
Buffered pH (Mod. Mehlich)		0.1	Zinc (Zn)	1.5	0.1 - 70.0
Base Saturation	<u>%</u>	Suggested	Sulfur (S)	15.1	10 - 100
Potassium	2	2.0 - 7.0	Aluminum (Al)	67.0	10 - 300
Magnesium	9	10 - 30			
Calcium	32	40 - 50	Est. Total Lead (Pb)	231.6	

Limestone & Fertilizer Recommendations for Grass Pasture - Maintenance

Limestone (Target pl	H of 6.6) Nitrogen, N	Phosphorus, P2O5	Potassium, K2O
4,000 lbs / acre	50 lbs / acre	60 lbs / acre	80 lbs / acre

Comments:

Without manure, maintain in subsequent years by topdressing 40 - 60 lbs/A N, 20 - 30 lbs/A P2O5 and 30 - 40 lbs/A K2O in early spring and again in early June.

The lead level in this soil is elevated. See Soil Lead Interpretation Sheet for more information: http://soiltest.uconn.edu/factsheets/SoilLead_new.pdf



UConn Soil Nutrient Analysis Laboratory

6 Sherman Place, Unit 5102, Union Cottage Storrs, CT 06269-5102 860-486-4274

www.soiltest.uconn.edu



PLANT SCIENCE AND LANDSCAPE ARCHITECTURE

Soil Test Report

Prepared For:

Melissa Staebner 104 Blue Hill Road Bozrah, CT 06334

mjstaebner@gmail.com 336.469.3131

Order Number: 13561

Sample Information:

Sample Name: BiltonSCR#2 Lab Number: 9281

Area Sampled:

3201

Received: Reported: 11/12/2020 11/18/2020

Lab Number: 9281

Results

Nutrients Extracted From Your Soil (Modified Morgan)

		Below Optimum	Optimum	Above Optimum	Excessive*
Calcium	833 lbs/acre				
Magnesium	99 lbs/acre				
Phosphorus	15 lbs/acre				
Potassium	125 lbs/acre				

* Excessive only defined for Phosphorus (>40 lbs/acre)

Soil pH (1:1, H2O)		5.4	<u>Element</u>	<u>ppm</u>	Soil Range in CT
Est. Cation Exch. Capacity		9.0	Boron (B)	0.2	0.1 - 2.0
(cmole+/100g)			Copper (Cu)	0.1	0.3 - 0.8
% Organic Matter		3.8	Iron (Fe)	11.9	1.0 - 40.0
Buffered pH (Mod. Mehlich)		6.0	Manganese (Mn)	2.3	3.0 - 20.0
Builded pir (Wod. Weilien)		0.0	Zinc (Zn)	0.9	0.1 - 70.0
Base Saturation	<u>%</u>	Suggested	Sulfur (S)	13.1	10 - 100
Potassium	2	2.0 - 7.0	Aluminum (Al)	87.9	10 - 300
Magnesium	5	10 - 30			
Calcium	23	40 - 50	Est. Total Lead (Pb)	low	

Limestone & Fertilizer Recommendations for Grass Pasture - Maintenance

Limestone (Target pl	H of 6.6) Nitrogen, N	Phosphorus, P2O5	Potassium, K2O
4,000 lbs / acre	50 lbs / acre	20 lbs / acre	100 lbs / acre

Comments:

Without manure, maintain in subsequent years by topdressing 40 - 60 lbs/A N, 20 - 30 lbs/A P2O5 and 30 - 40 lbs/A K2O in early spring and again in early June.

Your magnesium level is below optimum. Use dolomitic limestone to raise the soil pH.

Limestone & Fertilizer Recommendations for Grass Pasture - Intensively Managed

Limestone (Target pl	H of 6.6) Nitrogen, N	Phosphorus, P2O5	Potassium, K2O
4,000 lbs / acre	100 lbs / acre	20 lbs / acre	140 lbs / acre



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PLANT SCIENCE AND LANDSCAPE ARCHITECTURE

Soil Test Report

Prepared For:

Melissa Staebner 104 Blue Hill Road Bozrah, CT 06334

mjstaebner@gmail.com 336.469.3131

Order Number: 13561 Sample Information:

Sample Name: BiltonSCR#3

Lab Number:

9282

Area Sampled:

Received: Reported: 11/12/2020 11/18/2020

Results

Nutrients Extracted From Your Soil (Modified Morgan)

		Below Optimum	Optimum	Above Optimum	Excessive*
Calcium	313 lbs/acre				
Magnesium	53 lbs/acre				
Phosphorus	17 lbs/acre				
Potassium	159 lbs/acre				

* Excessive only defined for Phosphorus (>40 lbs/acre)

Soil pH (1:1, H2O)		5.7	<u>Element</u>	<u>ppm</u>	Soil Range in CT
Est. Cation Exch. Capacity		2.8	Boron (B)	0.1	0.1 - 2.0
(cmole+/100g)			Copper (Cu)	0.1	0.3 - 0.8
% Organic Matter		1.0	Iron (Fe)	5.3	1.0 - 40.0
Buffered pH (Mod. Mehlich)		6.4	Manganese (Mn)	2.5	3.0 - 20.0
Buttered pir (mod. memon)		Ψ,.	Zinc (Zn)	0.3	0.1 - 70.0
Base Saturation	<u>%</u>	Suggested	Sulfur (S)	9.9	10 - 100
Potassium	7	2.0 - 7.0	Aluminum (Al)	38.6	10 - 300
Magnesium	8	10 - 30			
Calcium	28	40 - 50	Est. Total Lead (Pb)	low	

Limestone & Fertilizer Recommendations for Grass Pasture - Maintenance

Limestone (Target p)	H of 6.6) Nitrogen, N	Phosphorus, P2O5	Potassium, K2O
1,000 lbs / acre	50 lbs / acre	20 lbs / acre	100 lbs / acre

Comments:

Without manure, maintain in subsequent years by topdressing 40 - 60 lbs/A N, 20 - 30 lbs/A P2O5 and 30 - 40 lbs/A K2O in early spring and again in early June.

Your magnesium level is below optimum. Use dolomitic limestone to raise the soil pH.

Limestone & Fertilizer Recommendations for Grass Pasture - Intensively Managed

Limestone (Target pl	H of 6.6) Nitrogen, N	Phosphorus, P2O5	Potassium, K2O
1,000 lbs / acre	100 lbs / acre	20 lbs / acre	140 lbs / acre

Attachment 4 Bilton Site Somers, CT Bilton - Somers, CT Area 1&2 Grazing Site Fenced Area 27.65

