



STATE OF CONNECTICUT

DEPARTMENT OF AGRICULTURE

Office of the Commissioner



Bryan P. Hurlburt
Commissioner

860-713-2501
www.CTGrown.gov

August 24, 2021

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

Re: Greenskies Proposed Solar Energy Project - Mulnite II Located at Wapping Road and Miller Road East Windsor, Connecticut

Dear Executive Director Bachman:

Pursuant to 16-50k(a) of the Connecticut General Statutes, we have reviewed the above cited project with respect to agricultural impacts, specifically, to determine whether "...such project will not materially affect the status of such land as prime farmland..."

The farm where this project will be located, Mulnite Farm includes two parcels, with a solar array being proposed on both parcels. The first parcel, known as the Miller Road parcel, is 25.36 acres (+/-) and is all prime farmland. As stated by the developer (Greenskies), the project footprint on this parcel is 13.35 acres. The second parcel, known as the Wapping Road parcel, is 24 acres (+/-) and is all prime farmland. As stated by the developer (Greenskies), the project footprint on this parcel is approximately 4 acres. Taken together, the two parcels are approximately 50 acres, with approximately 17.35 (+/-) acres of prime farmland (about 35% of the prime farmland on the parcels) being used for the solar project.

In a letter to the Department of Agriculture, dated August 9, 2021 (enclosed), the developer's representative, Lee Hoffman from Pullman & Comley, stated that Greenskies would take the following actions to minimize impacts to prime farmland.

- 1) On the Miller Road parcel, Greenskies has committed to utilizing sheep grazing as an agricultural co-use. In the August 9, 2021 letter referred to above, the developer's representative states that about 20 acres of the Miller Road parcel will be available for grazing sheep. Greenskies is proposing to partner with the American Solar Grazing Association (ASGA) and the University of Connecticut in this endeavor; and
- 2) For the Wapping Road parcel, Greenskies has committed to growing vegetable crops between the rows of solar panels. Greenskies has been working with USDA's Natural Resources Conservation Service to develop a vegetable crop production plan, which would include sufficient row spacing for planting and

cultivating crops. Further, Greenskies has committed to providing water for irrigation, but has yet to finalize exactly how the irrigation water will be provided (e.g., through storm water basins, cistern, a solar well or other source). Lastly, Greenskies has also committed to launch a marketing campaign to attract new or smaller growers/farmers to this project.

Details of the above co-use proposal are in the aforementioned letter. As a result of the co-use and continuing farming activities above, and the successful implementation of them throughout this site, the Department of Agriculture concludes this project will not materially affect the status of project land as prime farmland. The Department of Agriculture will continue to monitor the proposed project, and should changes to the proposal raise concerns to the Department, we reserve the right to modify our position on this project, including opposing it, in the future, as detailed plans are provided by the developers.

If you have any questions, please feel free to contact Stephen Anderson of my staff. Steve can be reached at Stephen.Anderson@ct.gov, or at (860) 713-2592.

Sincerely,



Bryan P. Hurlburt
Commissioner

Enc.

Cc: Katie Dykes, Commissioner, Department of Energy and Environmental Protection
Lee Hoffman, Pullman & Comley



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VIA ELECTRONIC MAIL

August 9, 2021

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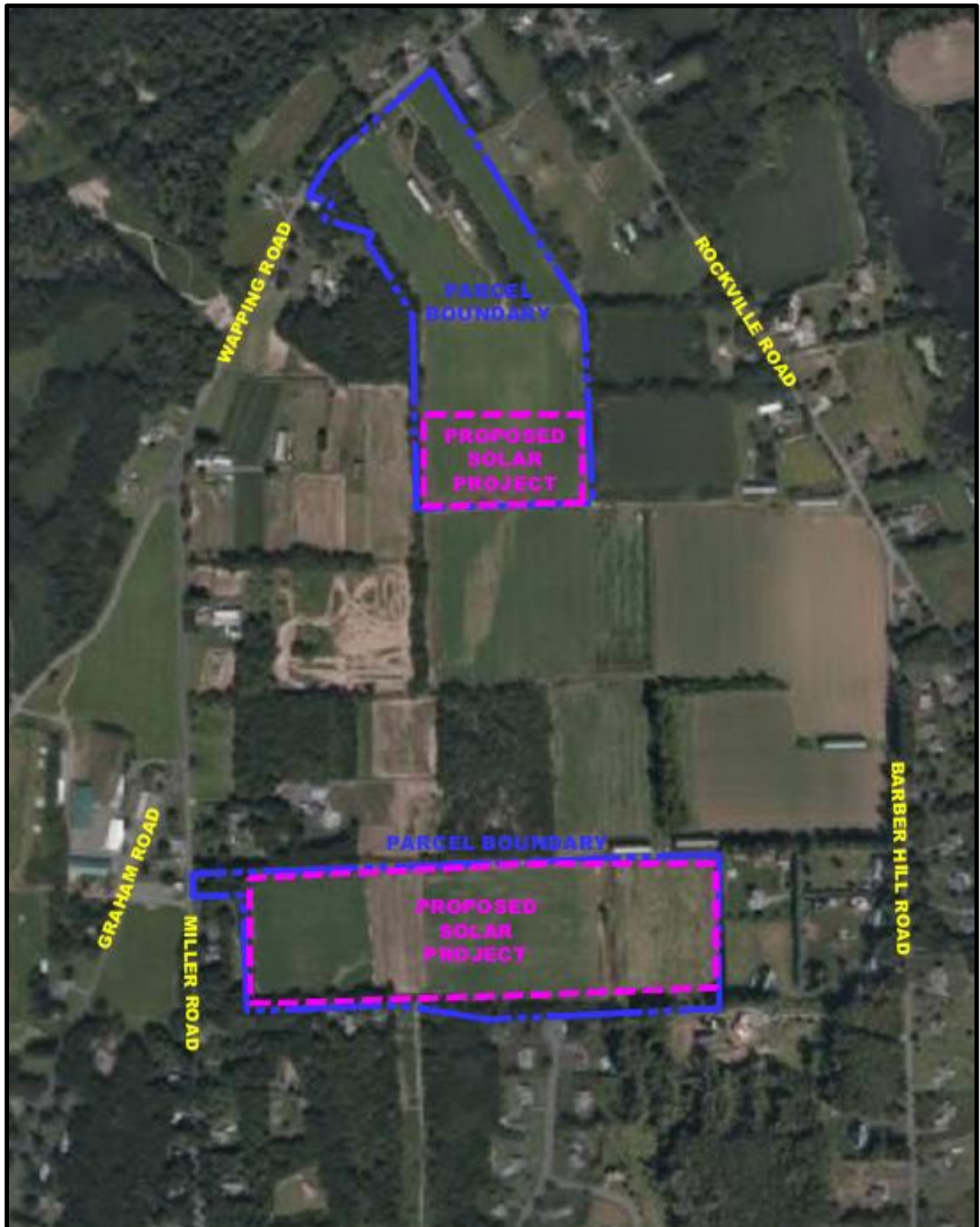
Re: Proposed Agricultural Uses for Solar Energy Project - Mulnite II Located at Wapping Road and Miller Road East Windsor, Connecticut

Dear Mr. Anderson:

I am writing on behalf of my client, Greenskies Clean Energy (“Greenskies”) regarding a project located on Mulnite farm in East Windsor, Connecticut. This letter will serve as follow-up from the July 13, 2021 letter the Department received from Greenskies, as well as the Zoom meeting with the Department and Greenskies on August 3, 2021. As we indicated during our meeting, the Mulnite family has indicated to Greenskies that it is no longer able to continue with farming, and none of the current owners’ family members wish to continue with agricultural production at the site. Although the properties are currently being leased to tenant farmers on a short-term basis, the owners have indicated to Greenskies that if Greenskies is not able to develop a solar project on these sites, they will be sold for residential development. Greenskies believes that it has developed a path forward that will allow all of the acreage in question to remain in agricultural production while simultaneously generating renewable energy.

We are writing today to obtain the Department’s agreement to these ideas. This letter will explain to the Department exactly what Greenskies is willing to do with respect to each of the two parcels in question. Greenskies is committing to have the proposed activities be part of the project. It is Greenskies’ hope that the Department will issue a letter, pursuant to Public Act 17-218, to the Siting Council indicating that the proposed project, provided that it is constructed as outlined in this letter, will not have an adverse impact on agricultural resources. Assuming the Department is willing to issue such a letter, Greenskies will then file a petition with the Siting Council.

As was explained in greater detail in Greenskies' July 13, 2021 letter, there are two non-contiguous parcels that will comprise this project. This Miller Road parcel is the more southerly parcel and consists of 25.36 acres. Greenskies is proposing a sheep grazing plan for this parcel. The northern parcel is known as the Wapping Road parcel and consists of approximately 24 acres. The proposed project will be located on the southernmost portion of the Wapping Road parcel and will only encompass approximately four to five acres at the south of this parcel. Greenskies has designed this portion of the project to allow for crops to grow and be harvested in between the rows of solar panels. For east of review, a map of both parcels, along with where the solar projects would be located on each parcel is included on the next page.



Greenskies provided as much detail as it could with respect to the proposed agricultural operations on these parcels as it could during our meeting last week. As the Department can appreciate, some of the details regarding agriculture at these sites will need to be finalized as the project's construction details become finalized during the approval process. Nonetheless, the project is at a stage of development now where Greenskies can represent to the Department that it is willing to undertake the following activities at the two parcels.

Wapping Road Parcel

For the Wapping Road parcel, Greenskies commits to the growing of crops between the rows of solar panels that will encompass the project, during the life of the project. Greenskies anticipates that the crops will be a low-growing cash crop that can be harvested in between the rows of panels. Greenskies has solicited assistance in this endeavor from the Natural Resources Conservation Service (NRCS) of the U.S. Department of Agriculture (USDA). The NRCS has informed Greenskies that 16.5 feet of inter-row spacing between the rows of panels will be sufficient for planting, and Greenskies has widened its usual inter-row spacing to accommodate this distance for the Wapping Road Parcel. Greenskies will also commit to providing sufficient water for the growing of crops at this location, however, it reserves the right to ascertain how best to provide this water, whether it be from stormwater basins, a cistern, a solar well, or some other source.

Greenskies will work with the NRCS and other resources to find a tenant farmer who is willing to grow crops on this site. The crops that will likely be cut and come again crops such as herbs or cut flowers, but Greenskies is amenable to any crops that can will be low growing. While Greenskies will likely not be able to find a single tenant farmer who is willing to grow crops on the site for the life of the project, based on prior conversations with NRCS, Greenskies anticipates that the site will be a good site for those who wish to begin a career in agriculture, given its limited size and the provision of water on site. As such, Greenskies anticipates that a series of tenant farmers will farm the parcel throughout the life of the project.

To that end, Greenskies plans to launch a marketing campaign to attract new or smaller growers/farmers to this project. There are numerous channels where GCE will post the availability of the acreage in the solar array on Wapping Road parcel for several small growers to lease to the target market. Greenskies and the NRCS have preliminarily identified the following resources to locate tenant farmers. Greenskies will utilize these resources until a suitable tenant can be located:

- The Knox Park Foundation: <https://www.knoxhartford.org/about-knox/staff/>
- The Gits of Love Incubator Program [Gifts of Love](#)
- Creative Living Community of Connecticut <https://creativelivingcommunityofct.org/>
- Common Ground High School (farm based public school) [Common Ground – High School, Urban Farm, and Environmental Education Center \(commongroundct.org\)](#)

- CT Northeast Organic Farmers Association [CT NOFA – The Northeast Organic Farming Association of Connecticut](#)'s mission is to ensure the growth and viability of [organic agriculture, organic food, and organic land care in Connecticut](#).
- The New CT Farmer Alliance <https://www.newctfarmers.com/>
- CT Farmlink Program to post the available farmland for leasing farmers

For the perimeter of the solar array, Greenskies also intends to incorporate a soil improvement plan into the project plans including natural pollinator habitat enhancement measures through use of a native pollinator seed mix throughout the array areas. This will retain soil and prevent erosion, fix nitrogen, prevent soil compaction, and improve water infiltration of soils. When the project has reached the end of its useful life, Greenskies commits to decommission the project and remove all above-ground structures and those below ground structures that are located less than 18 inches below ground so that the site may be reused as the owners see fit upon completion of the project.

Miller Road Parcel

The Miller Road parcel will utilize sheep grazing for its agricultural co-use. Greenskies is a member of the Solar Grazing Association and will make full use of its membership and the assistance the Association provides as it develops the detailed arrangements with specific shepherds' grazing plan for the site. There are approximately twenty acres available for sheep grazing at this parcel. It is anticipated that there will be between three to four sheep per acre grazing the forage that will be located between the panels. Greenskies is currently working with the University of Connecticut to develop the appropriate forage base between the panels and will be guided by the University's recommendations when it selects its seed mix for the project. The sheep will graze at the site from May through November, and will overwinter elsewhere. Greenskies will provide water for the sheep, and is currently evaluating several options (water truck, tanks/cisterns and solar wells) for the provision of water.

The sheep will rotate around various locations within the solar project. This rotation will serve several goals. First, it will keep the forage from being overgrazed at any part of the project. In addition, the sheep manure, which is pelletized, will not be concentrated in any one particular area. This will assist in keeping the manure from contaminating any stormwater basins, and the sheep will be kept far enough away from the stormwater basins to avoid contamination.

Proactive measures will be taken to ensure that all equipment on site is inaccessible to the sheep. The Project will be designed so that the solar arrays have a height that allow the sheep to pass underneath (the lowest edge of the panels will be at least two feet above the ground), and cables and trays will be secured such that these structures are inaccessible to the sheep. The sheep will be fenced to ensure their safety and the emergency response plan for the facility will include a section for how to keep the animals secure in the event of an emergency.

For the perimeter of the solar array, Greenskies also intends to incorporate a soil improvement plan into the project plans including natural pollinator habitat enhancement measures through use

of a native pollinator seed mix throughout the array areas. This will retain soil and prevent erosion, fix nitrogen, prevent soil compaction, and improve water infiltration of soils. When the project has reached the end of its useful life, Greenskies commits to decommission the project and remove all above-ground structures and those below ground structures that are located less than 18 inches below ground so that the site may be reused as the owners see fit upon completion of the project.

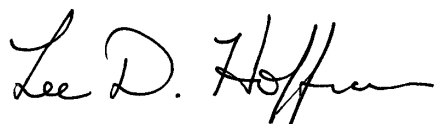
Conclusion

Greenskies is committed to making this project a success. To that end, Greenskies has consulted with the University of Connecticut to obtain linkage to the Connecticut Sheep Breeder's Association, provide general metrics for the sheep grazing plan for the Miller Road parcel, and assist in developing the appropriate forage mix. Greenskies has also consulted with the Connecticut Agricultural Experiment Station for information related to the fungicides that were used in developing shade tobacco at the site and to discuss the soil testing that should be done at the site prior to using the site for the grazing of sheep. Finally, Greenskies consulted with the NRCS to: identify potential tenants for the Wapping Road parcel, assist with appropriate conservation practices, including the possible use of no till tractors or small walk behind tractors, cover crop selection based on soil survey and choosing cover crop seed mixes to be used after crop harvesting. The NRCS also assisted in providing advice regarding the seed mixes to be used in the sheep grazing areas and the variety of soil testing that might be useful prior to developing the sheep grazing plan for the Miller Road site.

Greenskies will continue to utilize these resources as it finalizes its farmer specific plans, gets its project approved and constructs the project. Greenskies wants the agricultural uses at the project to succeed and will continue to work to ensure that they do for the life of the project. Greenskies therefore reiterates its request that the Department draft a letter indicating that it has reviewed Greenskies' proposal for the agricultural co-uses at the site and believes that the project, if completed as outlined above, will have no adverse impact to agricultural resources.

Should you have any questions concerning the foregoing, please contact me at your convenience. Thank you in advance for your assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Lee D. Hoffman". The signature is written in a cursive, flowing style.

Lee D. Hoffman