

VIA ELECTRONIC MAIL

July 13, 2021

Stephen Anderson
State of Connecticut Department of Agriculture
450 Columbus Blvd., Suite 701
Hartford, CT 06103

**Re: Solar Energy Project Considerations, Mulnite II Wapping Road and Miller Road
East Windsor, Connecticut**

Dear Mr. Anderson:

I write to describe a proposed project at “MulniteFarm” located in East Windsor, Connecticut. This project includes two parcels, and it is being proposed that a solar photovoltaic array will be constructed on each parcel. The two facilities are depicted on the attached maps for your review. Greenskies (GCE) wishes to pursue a petition for declaratory ruling before the Siting Council in connection with this proposed project. As you know, section 16-50k(a) of the Connecticut General Statutes requires that for a solar photovoltaic facility with a capacity of two or more megawatts to pursue such a petition, the Department of Agriculture must represent, in writing, to the Connecticut Siting Council that such project will not materially affect the status of such land as prime farmland. It is our hope that once the Department has reviewed the information contained in this letter, it would agree that the project will not materially affect the current status of land as prime farmland.

The project site is the Mulnite farm. We are providing this information in response to the CT Department of Agriculture’s Solar Energy Project Considerations guidance, dated January 16, 2020. Our answers to the Department’s request for information are provided in the responses below.

- 1) **Farm/Property Information** - Provide a description of the farm property, including but not limited to the following (include appropriate maps and surveys to allow evaluation):
 - a. Farm owner(s), farm name and location:

The property is known as “Mulnite Farm” in East Windsor, Connecticut. The landowner is Leonard Mulnite.
 - b. Total acreage, identification of prime, statewide and/or locally important farmland soils & acreage:

This project consists of two parcels. Each parcel has one solar array. A map showing the foot print of the solar facility on the Miller Road parcel is provided in Exhibit A. On Miller Road, the parcel is 25.36 acres, of which 25.35 acres consists of prime farmland soils, and farmland soils within the proposed project fenceline is 11.15 acres. The total project area is 13.35 acres..

A map showing the foot print of the solar facility on the Miller Road parcel is provided in Exhibit B. The parcel on Wapping Road is approximately 24 acres, of which 24 acres consists of prime farmland soils, and farmland soils within the proposed project fenceline is approximately 3.92 acres. The total project area is 3.92 acres. The scope of the prime farmland soils is shown on the enclosed document Farmland Soils Map, attached as Exhibit B.

- c. Current production agriculture on the farm and the approximate location of crops, farm buildings, etc. used to support the farming operation:

This growing season, shade tobacco has been planted by farms who are leasing both parcels, because the cash value of shade tobacco has recently increased on the commodity market. In the past, Leonard Mulnite has occasionally leased some of his property to random farmers, however, nothing has been done on a consistent or long-term fashion.

2) Energy Project Information

- a. Describe the energy project, including but not limited to, the size of the project in megawatts (MW), the footprint being proposed as it relates to prime farmland on the property, # of panels (if known), and a description of infrastructure needed to support the project.

The overall, proposed system size of the two energy projects is 5 megawatt (MW) alternating current (AC) and consists of two parcels total of 50 acres. The total acreage of the two projects, however, is anticipated to be approximately 17.27 acres.

As shown in Exhibit A, the project footprint for parcel on Miller Road is approximately 13.35 acres, of which 13.35 acres are on prime farmland soils, being located within the proposed fenceline of the project. The solar project consists of 10,278 fixed tilt 30- degree modules. Required infrastructure includes one stormwater basin, and two concrete equipment pads. The access road to the solar project will be from Barber Hill Road.

As shown in Exhibit B, the project footprint for the parcel on Wapping Road is approximately 4 acres, of which 4 acres are on prime farmland soils, being located within the proposed fenceline of the project. The solar project consists of 2,688 30-degree tilt modules. Required infrastructure includes one stormwater basin and one

concrete equipment pad. The access road to the solar project will be from Rockville Road.

- b. Describe what the energy will be used for and how it will benefit the farming operation.

The two projects include a Zero Emissions Renewal Energy project and a Shared Community Energy Facility project. As a shared clean energy facility under the SCEF program, Greenskies would contract with “Subscribers” for a percentage interest in the total amount of electricity generated. Although the energy generated from the Project would not be used on-site, the Property owners would use the lease revenue to revive the dormant agricultural uses on their property in coordination with Greenskies. This shared use would promote agricultural activities and renewable energy, specifically increased generation from renewable energy resources and diversification of the State’s renewable energy portfolio.

- c. Are there future plans to increase energy capacity beyond what is proposed? If so, please describe these future plans, and any impacts the increase may have on prime farmland or the overall farming operation

No

3) **Agricultural Resource Impacts**

- a. Describe any production agriculture currently being conducted within the footprint of the solar project.

This growing season, shade tobacco has been planted on both parcels because the cash value of shade tobacco has recently increased on the commodity market.

- b. Describe overall how the project will impact production agriculture currently being conducted on the farm.

For agricultural use to continue within the leased area, GCE will undertake farming activities since the Mulnite Family no longer intends to farm its land. Leonard Mulnite is elderly and sick and hasn't been farming for many years. He will occasionally lease some of his land to other farmers, however, that leasing tends to be short term and intermittent.

Greenskies does not expect there to be a reduction in acreage used for agricultural production. The reason for this is that Greenskies will be conducting agricultural operations within the solar array as discussed in section 3.c. below.

- c. Provide a description of any plans by the farm owner(s) to foster production agriculture within or as a result of the development (e.g., grazing animals in and around the solar project, providing pollinator habitat).

To maintain the agricultural character of the area, GCE has committed to incorporate an agricultural co-use within the project site with the following features:

1) *Sheep Grazing*

Sheep grazing on solar sites has been practiced throughout the United States and Europe for years without incident. For the Miller Road parcel, Greenskies is proposing the following activities:

- *GCE's facility site would host the rotational grazing of sheep;*
- *GCE would partner with the American Solar Grazing Association (ASGA) to identify sheep farmers in Connecticut that would be willing to work on the project and develop a comprehensive grazing plan for implementation;*
 - *GCE would utilize a seed mix that would address the nutritional needs of sheep, provide a low-growing, easily maintained and sustainable vegetation solution for solar installations, and be pollinator friendly; and*
 - *GCE has preliminary plans for on-site sheep grazing. The sheep would not have access to the entire facility footprint at a given time. They would be moved to different locations. GCE would also be willing to relocate the sheep to a different portion of the site farther away from neighbors should noise become an issue.*

GCE estimates roughly two to three sheep per acre would be on site. The objective is to promote the health of the grazing sheep, control vegetation growth and satisfy the plans for agricultural co-use, not necessarily to maximize the number of sheep on site.

Proactive measures will be taken to ensure that all equipment on site is inaccessible to the sheep. Additional amenities, such as shelter, interior fencing etc., will be added to the final project at the direction of the farmer. All GCE employees or subcontractors that will perform routine maintenance on site will undergo training to ensure that routine maintenance and sheep grazing can occur alongside each other. The Site will be fenced in and signage will be placed throughout the Site to notify neighbors, farm workers, and other individuals that may be nearby that sheep are present onsite. In addition, 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.

Wiring will be installed both on the underside of the panels and underground, thereby protecting it from UV light and weather exposure. The wire will be rated for the environment and installed in line with national electrical code. Metal casing, high

strength plastic mesh, or another alternative will be included in the final design to protect the wiring from sheep.

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.

2) Vegetable Crop Production

For the Wapping Road parcel, Greenskies is proposing growing vegetable crops. Greenskies has already started working with USDA NRCS Hartford County Conservation District to develop a vegetable crop production plan within the project fence line of solar project to replace the shade tobacco.

Farming Marketing Campaign - GCE also 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 3.92 acres in the one MW solar array on the Wapping Road parcel for several small growers to lease to the target market. GCE and USDA NRC have preliminary identified the following resources:

- *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*

When speaking with potential new farmers, GCE and USDA NRCS will focus on high value crops per sq ft or cut and come again crops like herbs and cut flowers. Strawberries last for multiple years and are low growing.

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.

Perhaps even more importantly, sheep farmer/solar grazer and Mulnite farm will benefit economically from proceeding in this fashion. The sheep farmer will benefit in that grazing contracts are typically negotiated for the lifespan of the project, which in this case will be 20-25 years. This will provide the sheep farmer with a long-term source of stable income. Moreover, the Mulnite Farm will benefit from the lease payments it will receive for the use of its land, thereby being able to use that income stream to farm its other properties. Finally, it should be noted that the existence of the solar project protects farmland soils on site from more destructive and permanent types of development, such as residential subdivisions.

4) Alternatives to Locating the Energy Project on Prime Farmland

- a. Provide a description of any alternatives considered by the farm owner(s) to developing the project on prime farmland soils (e.g., the option of selling agricultural development rights for the farm instead of developing for solar, or as a mitigation measure to reduce the size of the solar development).

Greenskies is working with the current owner of the site so that the owner may continue farming the remainder of their other properties, using the proceeds of the lease with Greenskies to assist the farm financially. Greenskies will be leasing the property from its current owners, and the property will revert back to the farm at the conclusion of the solar project. As such, the land will be available for farming at the end of the useful life of the project.

Greenskies has spoken to the current landowners about availing themselves of the Department's Farmland Restoration Program, but the owners do not want any involvement in that program. As such, Greenskies cannot undertake such a program.

- b. Describe any alternatives examined which might enable placement of some or all of the solar panels in locations other than on prime farmland (e.g., elsewhere on the property or on farm buildings).

Greenskies and the landowner examined the entire project site. Due to other site constraints (e.g. residences), there are currently no other viable on-site alternatives for the solar energy facility.

- c. Provide a description of any other form of mitigation considered by the farm owner(s) (e.g., farmland restoration, or a future commitment to preserve the farm)

The current landowner does not wish to undertake a farmland restoration program. By receiving lease revenues from the proposed project, the landowner will receive additional funding, thus ensuring the preservation of that farm.

Greenskies and the landowner have worked collaboratively to create diverse crop production within the 1MW solar array and sheep grazing within the 4 MW solar array. Greenskies has also included pollinated habitat and bee hives on the perimeter of the solar array. As designed, the proposed solar facility will benefit/contribute to the preservation of farmland soils.

Pollinator habitat will also stabilize and improve soil quality over time through planting of native species adjacent to the solar array fence. Greenskies is willing to consult with the department on the seed mix for the array areas, which will be most beneficial to soil health for agriculture at the conclusion of the project.

Accordingly, Greenskies would reiterate its request to the Department that it provide a letter to the Siting Council indicating that if Greenskies proceeds with its project in the fashion outlined above, it will not have an adverse impact on agriculture.

We look forward to working with the Department on this matter. Should you have any questions, please contact me at your convenience. Thank you in advance for your consideration.

Sincerely,



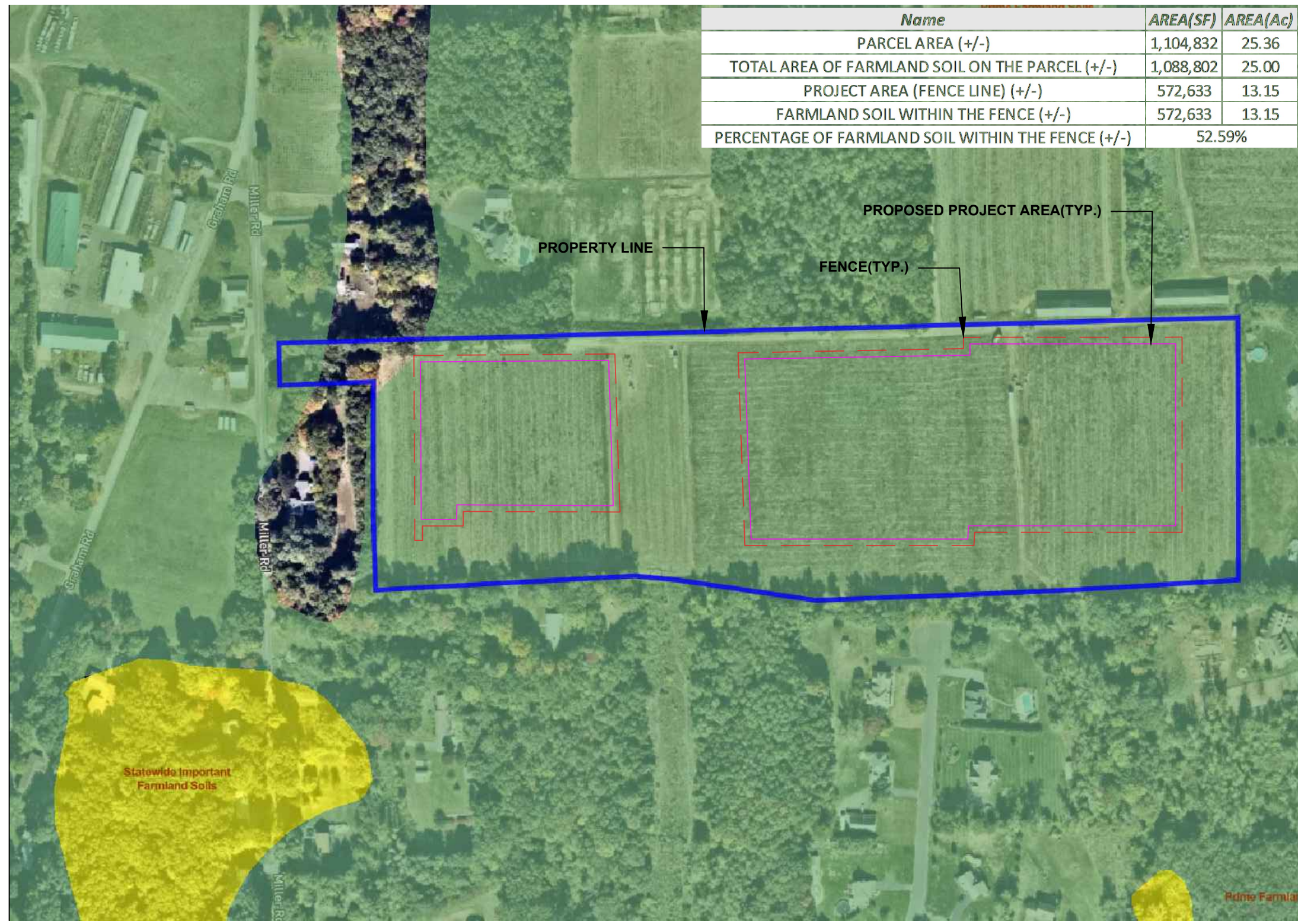
Bonnie Potocki
Project Developer
Greenskies

T (860) 398-5408 Main | (860) 740-5289 Direct | F (860) 516-3139
Bonnie.Potocki@greenskies.com

EXHIBITS

- A. Project Site Map for the solar facility on Miller Road, East Windsor
- B. Project Site Map for the solar facility on Wapping Road, East Windsor

Exhibit A



| Name | AREA(SF) | AREA(Ac) |
|--|-----------|----------|
| PARCEL AREA (+/-) | 1,104,832 | 25.36 |
| TOTAL AREA OF FARMLAND SOIL ON THE PARCEL (+/-) | 1,088,802 | 25.00 |
| PROJECT AREA (FENCE LINE) (+/-) | 572,633 | 13.15 |
| FARMLAND SOIL WITHIN THE FENCE (+/-) | 572,633 | 13.15 |
| PERCENTAGE OF FARMLAND SOIL WITHIN THE FENCE (+/-) | 52.59% | |

LEGEND

| | |
|---|------------------------------------|
| | Prime Farmland Soils |
| | Statewide Important Farmland Soils |

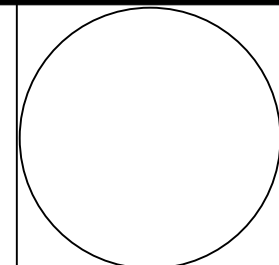
1 PROPOSED FARMLAND SOIL CALCULATION
S.01 1"=250'

PROGRESS SET
NOT FOR CONSTRUCTION

Greenskies
127 WASHINGTON AVENUE
NORTH HAVEN, CT 06457
PH - 860.398.5408
FAX - 860.398.5423

| REVISIONS: | | |
|------------|------|-------------|
| NO. | DATE | DESCRIPTION |
| | | |
| | | |
| | | |
| | | |

FARMLAND SOIL MAP
MULNITE FARM PHASE II
PV SOLAR ARRAY
MILLER ROAD
EAST WINDSOR, CT 06016

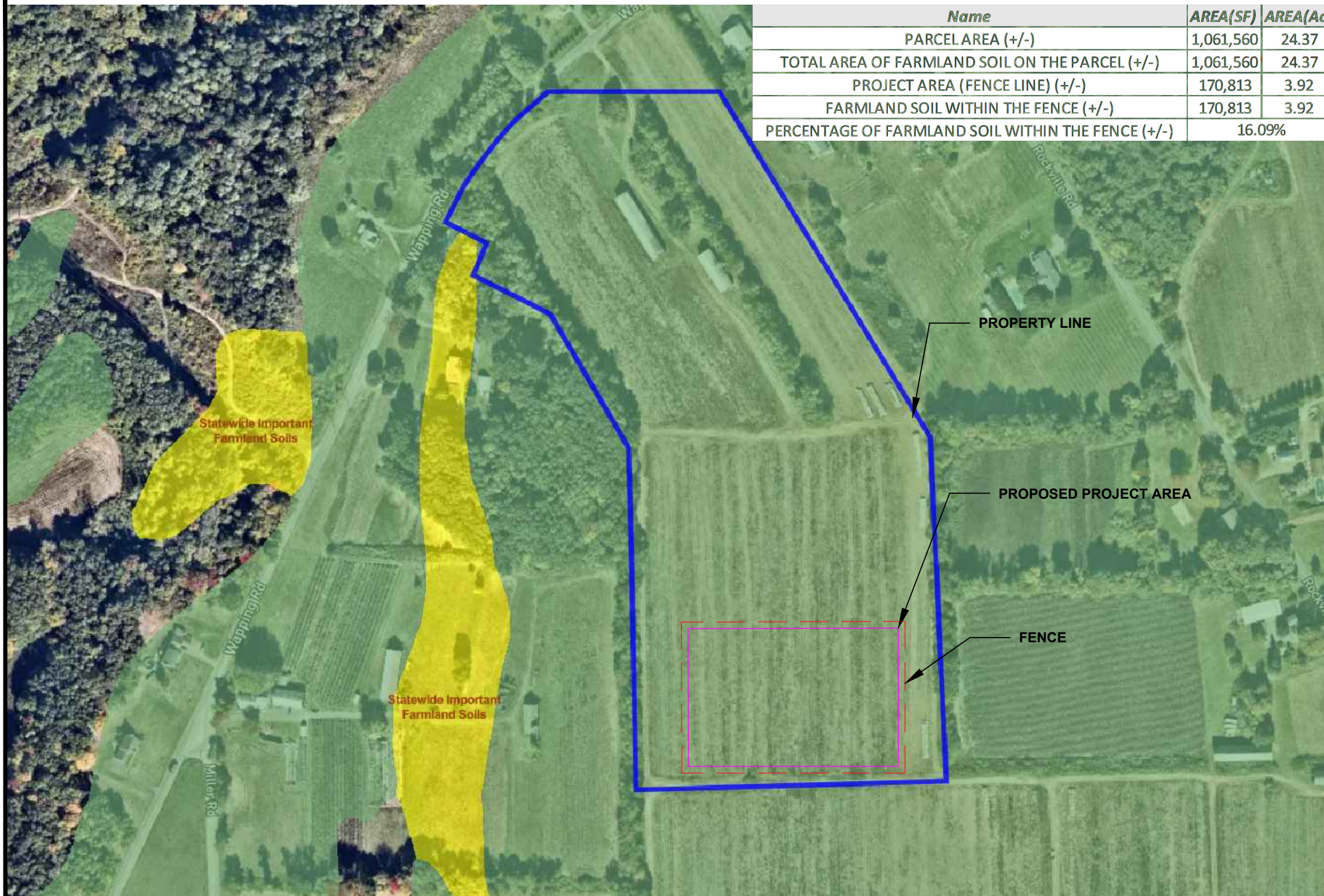


| | |
|------------|--------------|
| BATCH NO.: | PROPOSAL |
| DRAWN BY: | KK |
| SCALE: | AS NOTED |
| DATE: | 28 JUNE 2021 |

PV.01



Exhibit B



| Name | AREA(SF) | AREA(Ac) |
|--|-----------|----------|
| PARCEL AREA (+/-) | 1,061,560 | 24.37 |
| TOTAL AREA OF FARMLAND SOIL ON THE PARCEL (+/-) | 1,061,560 | 24.37 |
| PROJECT AREA (FENCE LINE) (+/-) | 170,813 | 3.92 |
| FARMLAND SOIL WITHIN THE FENCE (+/-) | 170,813 | 3.92 |
| PERCENTAGE OF FARMLAND SOIL WITHIN THE FENCE (+/-) | 16.09% | |

LEGEND

- Prime Farmland Soils
- Statewide Important Farmland Soils



1 PROPOSED FARMLAND SOIL CALCULATION
S.01 1"=250'

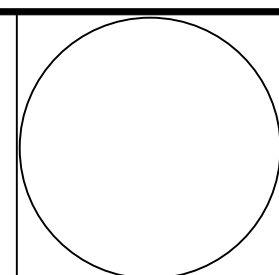
SOURCE: CT DEEP

PROGRESS SET
NOT FOR CONSTRUCTION

Greenskies
127 WASHINGTON AVENUE
NORTH HAVEN, CT 06457
PH - 860.398.5408
FAX - 860.398.5423

| REVISIONS: | | |
|------------|------|-------------|
| NO. | DATE | DESCRIPTION |
| | | |
| | | |
| | | |

FARMLAND SOIL MAP
MULNITE FARM PHASE II
PV SOLAR ARRAY
WAPPING ROAD
EAST WINDSOR, CT 06016



| | |
|------------|--------------|
| BATCH NO.: | PROPOSAL |
| DRAWN BY: | KK |
| SCALE: | AS NOTED |
| DATE: | 28 JUNE 2021 |

PV.01



Lee D. Hoffman
90 State House Square
Hartford, CT 06103-3702
p 860 424 4315
f 860 424 4370
lhoffman@pullcom.com
www.pullcom.com

VIA ELECTRONIC MAIL

August 9, 2021

Stephen Anderson
State of Connecticut Department of Agriculture
450 Columbus Blvd., Suite 701
Hartford, CT 06103

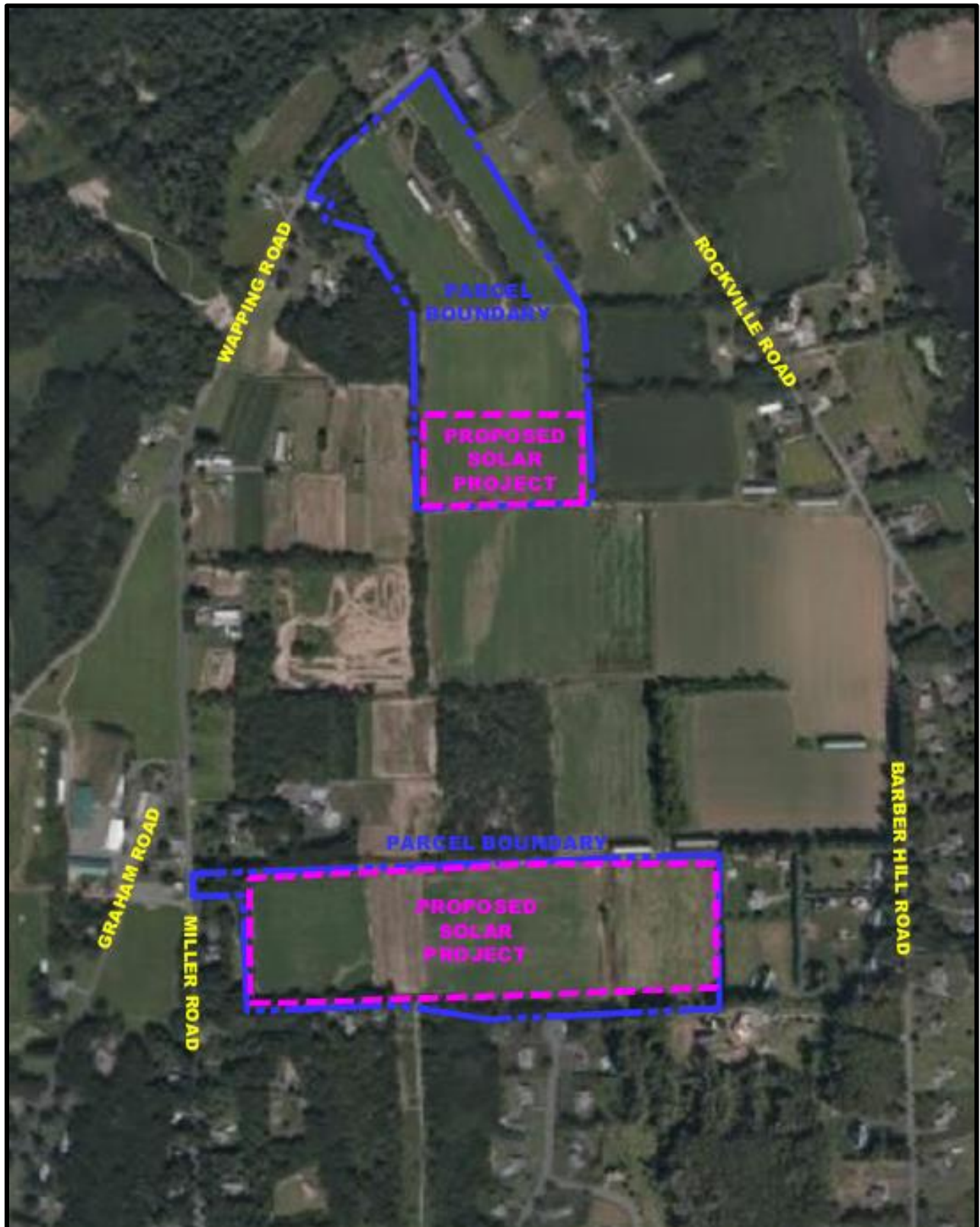
Re: Proposed Agricultural Uses for Solar Energy Project - Mulnite II Located at Wapping Road and Miller Road East Windsor, Connecticut

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.

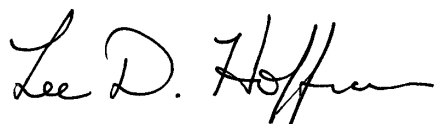
Conclusion

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



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

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- An Affirmative Action/Equal Employment Opportunity Employer -

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,

A handwritten signature in black ink, appearing to read "Bryan P. Hurlburt". The signature is fluid and cursive, with the first name being the most prominent.

Bryan P. Hurlburt
Commissioner

Enc.

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



Lee D. Hoffman
90 State House Square
Hartford, CT 06103-3702
p 860 424 4315
f 860 424 4370
lhoffman@pullcom.com
www.pullcom.com

VIA ELECTRONIC MAIL

August 9, 2021

Stephen Anderson
State of Connecticut Department of Agriculture
450 Columbus Blvd., Suite 701
Hartford, CT 06103

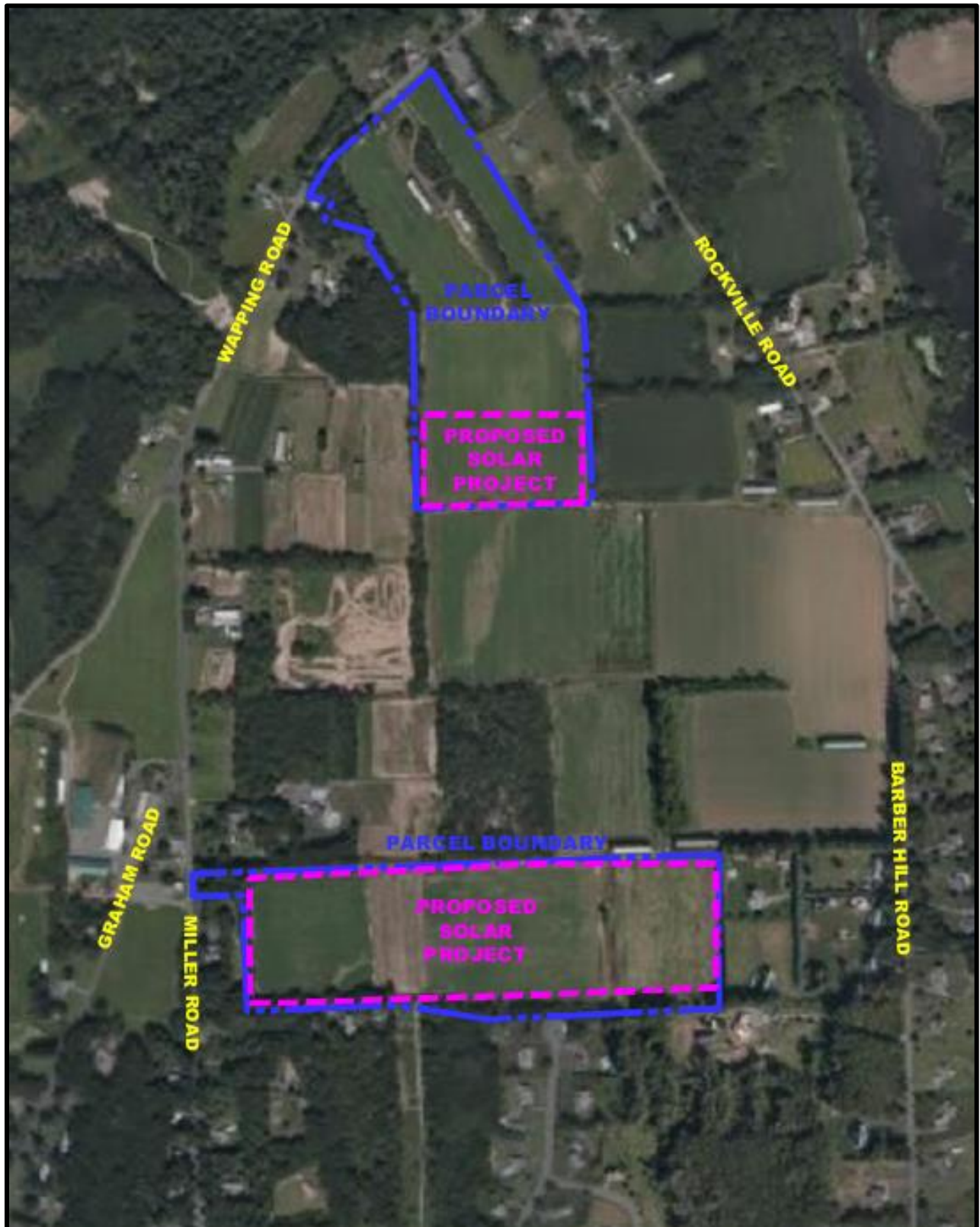
Re: Proposed Agricultural Uses for Solar Energy Project - Mulnite II Located at Wapping Road and Miller Road East Windsor, Connecticut

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.

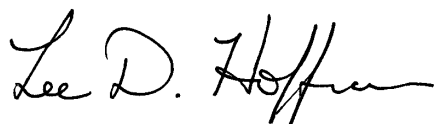
Conclusion

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