VIA ELECTRONIC MAIL

April 14, 2023

Holly Lalime
State of Connecticut Department of Agriculture
450 Columbus Blvd., Suite 701
Hartford, CT 06103

Re: Solar + Farming Project Considerations, Spencer Hill Road Winchester, CT

Dear Ms. Lalime:

We realize that you are transitioning away from agrivoltaics for the Department. Please forward this letter to your successor if you think that would be most appropriate.

We are working with the landowner of Spencer Hill Road in Winchester, Connecticut in connection with the development of a Solar + Farming Project on a portion of the property. I am writing this letter to describe the project in better detail and ask that the Department evaluate this proposal as the project begins its permitting process before the Connecticut Siting Council.

Greenskies 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 will agree that the project will not materially affect the current status of land as prime farmland.

For ease of review, we are enclosing a map depicting the overall property itself as well as the site/footprint of the solar facility. We are providing this information in accordance with 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 located at Spencer Hill Road, Winchester, Connecticut. The landowners are Frank Ahern and Karen Merete.

   b. Total acreage, identification of prime, statewide and/or locally important farmland soils & acreage:

127 Washington Avenue
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North Haven, CT 06473

The parcel is 190.38 acres, of which 21.5 acres are considered prime farmland soils and 13 acres are considered statewide important farmland soils. The project area is approximately 13 acres which is all classified as prime farmland soils. The scope of the prime farmland soils is shown on the enclosed document Farmland Soils Map Exhibit A.

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

The project area is a hay field and is currently being harvested by a tenant farmer. It has been a hayfield for three decades, since approximately 1993, when the current landowners purchased the property. Based on 2-foot contours, the slope is 8% average and 10 to 12% in some areas, with greater slope on the field edges. Grazing by cattle, pigs or horses is not possible because of the use intensity associated with those livestock would be anticipated to increase erosion potential on the land.

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 energy project is 3.7 megawatt alternating current (AC). As shown in Exhibit A, the project footprint is 13 acres and will be built on prime farmland soils. The solar project consists of approximately 8,232 *modules. Required infrastructure includes stormwater management features, and one concrete equipment pad. The access to the solar project will be from a gravel access road from Spencer Hill Road.*

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

This project is a zero-emissions renewable energy project. The energy will be used by the City of New London Board of Education through the Buy All Non-Residential Renewable Energy Solutions Program. As mentioned above, lease payments will be made to the landowners as a result of the solar project being placed on their land.

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.

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2) **Agricultural Resource Impacts**

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

The project area is a hay field and is currently being harvested by a tenant farmer. It has been a hayfield for three decades, since approximately when the current landowners purchased the property. The ability to have vegetable production on this site is limited due to the slope grade and potential for soil loss.

It does not appear that the current use of the property will be sustainable for the long term. The landowners have informed Greenskies that the payments made by the tenant farmer are insufficient to cover expenses associated with the farm. Over time, the haying of the site also has potential to deplete the soils. The combination of these two possibilities creates real risk that without the proposed project, the land will not stay farmland and may revert to residential development. A research study performed by Cornell University College of Agriculture and Life Science examined soil loss related to traditional production agricultural practices. Erosion rates and loss of topsoil are high especially on steep lands which have been converted to crops. ***Citation/Reference*** *~ Pimentel, David, and Michael Burgess. 2013. "Soil Erosion Threatens Food Production"* Agriculture *3, no. 3: 443-463. https://doi.org/10.3390/agriculture3030443. There aresteep slopesin the project area. There are also existing wetlands at the northern foot slope of the drumlin to the north.*

Thus, the Solar + Farming approach being proposed by Greenskies is anticipated to have benefits to the future farm's operations.

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

There will be no negative impact to production agriculture from the proposed project. The new use, the creation of a solar project with regenerative herb 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. Soil health will actually be improved by the regenerative practices employed on the solar site.

Greenskies contacted the USDA Natural Resource Conservation Service Torrington Field Office for recommendations for a dual-use solar project. Exhibit B presents the recommendations provided by USDA Torrington Field Office. They provided two recommendations: 1. Rotational Grazing with Sheep and 2. Keeping Beehives. For the second option, after the solar panels were installed, the field could be seeded into a mix of native perennial wildflowers and grasses beneficial to pollinators. USDA explained that the pollinator habitat would increase biodiversity, create a deep root system, mitigate soil erosion, and provide an excellent pollen source. Based on those recommendations Greenskies created the proposed project.

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In terms of USDA option #1; Grazing by cattle, pigs or horses is not possible because of the use intensity associated with those systems which would increase erosion potential on the land. Greenskies feels that based on previous concerns expressed during Siting Council hearings and limited resource availability sheep grazing is not an appropriate or viable planned use at this time. Thus, grazing at all is not possible. For option 2, we built on the NRCS recommendation of using vegetation to increase soil health, but also plant it and manage it in such a way that it yields a harvestable crop.

The proposed option for the agricultural use is ideal to prevent soil erosion because the slope is on average 8% and up to 10 to 12% in some areas.

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).

Greenskies, in agreement with the landowner, has started working with USDA NRCS Litchfield County Conservation District to develop the selected agriculture use, land-based regeneration within the proposed project fence line of solar project.

Greenskies Clean Energy proposes regenerative land management of a Solar + Farming project through 1) planting of perennial herbs and botanical plants that would be harvested and sold, 2) planting of perennial cold season grasses, and 3) planting of pollinator friendly flowers and management of a honeybee apiary for honey sales. At a very high level, maintenance would include the following:

- *Delayed mowing, delayed mowing 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 and honey*
- *Overseeding as needed to maintain sufficient land coverage of plants*
- *Removal of invasive plants as needed*
- *General monitoring and upkeep of the soil, plant, and bee health*

A mix of herbs, botanicals, 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 is removed. Potential herbaceous plants being considered are: mint, dandelion, mullien, oregano, purslane, red clover, rosemary, thyme, yarrow and lavender. In addition, Greenskies will also review the Xeces Society guidance Pollinator Plants for Northeast Region and Pollinator Habitat Installation Guide to select plants for the project. The planting mix will also perform well for stormwater controls. 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.

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In contrast to the previously mentioned loss of topsoil with standard production agriculture, 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 will also earmark a section of the project area in the range of 1 acre for long term research projects to better understand how agriculture can co-exist with solar projects. Research on the production of crops under PV Solar system is still relatively new. Greenskies is in early coordination with Connecticut Agricultural Experiment Station to determine how to best pursue such a research project. CAES research study could likely encompass crop and variety trials, in which specific varieties of a selection of crops would be tested for production under the solar panels. The specific crops and varieties to be tested would be selected after a review of what crops have already been evaluated in similar field trials in New England, and from a list of crops and varieties are suited for more traditional agricultural production in New England. CAES suggested that the production of each crop variety would take place for a minimum of three growing seasons and various production metrics.

Soil testing would be performed, and local weather conditions would be monitored throughout the study. After the first three years of the study, variety trials could be completed on a new set of crops. The results of the study would provide crop recommendations for production under solar panels in Connecticut and may also result in some additional recommendations for best practices in the long term.

Research funding would be sought by CAES under programs that include specialty crops, agrivoltaics, and urban and emerging agriculture priorities. Although three are a variety of current programs that could fund this research study both at the state and national levels, the specific grants that are sought will depend on programmatic priority areas that match this research and the amount of funding available through a specific call for proposals. Funding for research would likely be sought in the 2024 or 2025 cycles, so that the research study could begin after the solar project has been built.

A potential option that is being considered for research is to work with a USDA NRCS conservation planner to use their new practice for soil health testing called CEMA 216. The goal of the practice is to evaluate and monitor soil health related to a specific goal. The goal of the soil health testing will be improving soil health for growth of perennial crop species within the fence line of the project.

Prior to the earmarked land being used for the research study, it will be farmed in the same way described for the balance of land.

3) **Alternatives to Locating the Energy Project on Prime Farmland**

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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).

The current owners of the property have no desire to sell their development rights for the property. The land on the property not being proposed for development with Solar + Farming, that is not prime farmland/statewide important farmland soil, is instead Forestland Habitat designated by Connecticut DEEP Division of Forestry and currently being used as a wood lot and classified PA490 land. The landowner intends to maintain the forestland in its current state.

Previously, the owners of the property pursued the option of developing the farmland area for residential development. After this agrivoltaic approach was presented to them, they decided that Solar + Farming is a more viable path.

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).

GCE and the landowner examined the entire project site. Due to other site constraints (e.g. wetlands high groundwater table, forestland habitat), there are currently no other viable on-site alternatives for the solar energy facility. The site constraints are detailed in the attached map of the proposed project site Exhibit C *Forestland Habitat map.*

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. In addition, at the time that the project is decommissioned, Greenskies is of the opinion that the soil quality will be better at the end of the life of the project than it would be if the site is to remain in its current state.

Greenskies is putting forward this project because it believes that it represents one of the best ways that solar and agriculture can co-exist. Sheep grazing is a valuable approach, to be sure, but there are other alternatives to grazing of livestock that should be considered. 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.

Based on the foregoing, 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 the prime farmland soils of the site.

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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. Prime Farmland Soil Map

B. USDA Recommendation Letter Regarding Agricultural Uses

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EXHIBIT A
Prime Farmland Soil Map

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EXHIBIT B
USDA Recommendation Letter Regarding Agricultural Uses

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Technical Assistance Recommendations

For: Green Skies Solar, Bonnie Potocki, Dennis Hicks

Recommendations By:
Sarah Ammirato, Soil Conservationist
sarah.ammirato@usda.gov or 860-618-4535

USDA Natural Resource Conservation Service
Torrington Field Office
1185 New Litchfield Street Torrington, CT 06790

Background Information:
After a discussion with Bonnie Potocki and Dennis Hicks, I reviewed contour maps, soils maps and site pictures to make recommendations for a dual-use solar project.
The site for the planned solar field is a hay field with a plant community of cool season grass. The soils description is approximately 88.2% prime farmland soils and farmland of Statewide importance, Paxton and Montauk fine sandy loam.
Characteristics of the Paxton soil is typically well-drained in the medium runoff class. Runoff class is determined by permeability of the soil type as well as field slope which estimates the potential for surface runoff to occur during a rain event.
Using a 2 ft contour map, I estimate the slope is 8% average and 10-12% in some areas, with less slope in the center and greater slope on the field edges. After reviewing topography and soils maps, I would suggest against farming annually tilled vegetables. I also recommend not grazing cattle, pigs, or horses because of the level of intensity associated with those systems.

Recommendations for the Green Skies Solar Project:
Alternative 1: Rotational Grazing with Sheep
A tenant farmer will be identified and allowed to pasture sheep during the grazing season, May 1st – October 31st.
Once a tenant farmer is identified, it is recommended they work with USDA NRCS to develop a Grazing Plan. This is a comprehensive document that analyzes forage supply and livestock demand. A Grazing Plan includes recommendations for rest periods, number and size of paddocks and contingency plans in the case of drought, mud, etc.
If this alternative is selected, infrastructure will need to be installed to facilitate rotational grazing. Perimeter fencing, to keep predators out and livestock in the grazing area is needed.
Temporary electric fencing (polywire netting, see above photo) is recommended within the solar field to create smaller paddocks that will move every day. Temporary electric fence can be charged using a small solar charger (see below photo).

A water source for the sheep is required. Quality, clean water is necessary for any livestock species. A water trough with a float valve is needed to ensure there is always water available.
According to North Dakota Extension, "livestock water requirements vary significantly depending on the species. Water consumption is influenced by several factors, including age, rate of gain, pregnancy, lactation, activity, type of diet, feed intake and environmental temperature".

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Technical Assistance Recommendations

See Table 4 below for estimates of water intake for sheep. These estimates should be increased during peak summer months.

Table 4. from literature published from North Dakota State University Extension.

Sheep

Table 4 lists water requirements for different categories of sheep. Sheep are able to obtain most of their water requirements from forage consumption. In addition to weight and level of production, water intake also increases in response to increases in environmental temperature.

Table 4. Water intake (gallons per head per day) for sheep.

Table 4. Water intake (gallons per head per day) for sheep.		
Class	Weight	Water intake
	(lbs)	
Lambs	5 to 20	0.1 to 0.3
Feeder lambs	60 to 110	1.0 to 1.5
Pregnant ewes	175 +	1.0 to 2.0
Lactating ewes	175 +	2.0 to 3.0
Rams	175 +	1.0 to 2.0

Alternatives for adequate water quantity and quality include

1. Drilled well with pump and hydrant to attached above ground hose and trough. This option provides a clean, reliable water source throughout the entire grazing season. This is a preferred alternative.
2. Rainwater from stormwater basins. Water is filtered and pumped into a cistern for storage and distributed to troughs with above ground water line. This option may require water testing/treatment and is not reliable during drought.
   Water stored in above ground cisterns for extended periods of time can lead to concerns of bacteria growth, and if exposed to sunlight, temperature concerns. This is not a preferred alternative.
3. Water transported from off site location. Farmer would need alternate water source (from home farm) to fill water tanks and transport daily to fill troughs. This provides a reliable source, but additional labor and management of the tenant farmer.

This alternative will require a high level of management and education of the tenant farmer. Given the topography and slope, daily animal moves are recommended. The flock will not graze an area for more than 24 hours. This grazing strategy will reduce soil compaction and degradation as much as possible.

Rest periods are required to allow the forage adequate time to recover. At minimum, a 30-day rest period should be followed before returning to the same paddock. Rest periods may change throughout the grazing season and is dependent on forage regrowth. This information will be outlined in an NRCS Grazing Plan.
The forage height will need to be monitored and should not be grazed below 4 inches minimum. Sensitive areas will also be identified after a more in-depth site review. These include areas of the field that are seasonally wet or saturated. These areas will be identified in a Grazing Plan and will require different management.

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Alternative 2: Keeping Beehives

After the solar panels are installed, the field could be seeded into a mix of native perennial wildflowers and grasses beneficial to pollinators. This would increase biodiversity, create a deep root system, mitigate against soil erosion, and provide an excellent pollen source. Once seeded, the pollinator plot will take about 2 years to establish.

A list of native wildflowers suitable for this project can be found on Connecticut Botanical Society website.

A farmer/beekeeper would bring their hives to the property and collect honey as it is produced throughout the year.

Required infrastructure would include perimeter fencing to keep predators out, a small square of polywire fencing surrounding the hives and a solar charger. Maintenance would include a delayed mowing, once a year after September 1st, not to disrupt grassland nesting birds. A delayed mowing ensures that the selected plants can reach flowering stage and provide the most nutritional value to pollinators.

Reseeding may be necessary after 5-10 years. No pesticides or herbicides should be used.

Overall management and infrastructure are minimal while having great benefits for wildlife, soil, and the land.

For additional information regarding above recommendations, please reference the following resources.

Xerces Society – Pollinator Planting Installation Guide for Pennsylvania and New England
15-025_02_XercesSoc_HabitatInstallGuide_Pennsylvania_ConservationCover327_web.pdf

NRCS – Pollinator Initiative
The Importance of Pollinators | Natural Resources Conservation Service (usda.gov)

Connecticut Botanical Society – List of Native Wildflowers
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Eileen Underwood
Holly Lalime
State of Connecticut Department of Agriculture
450 Columbus Blvd., Suite 701
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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 energy project is 3.7 megawatt alternating current (AC). As shown in Exhibit A, the project footprint is 13 acres and will be built on prime farmland soils. The solar project consists of approximately 8,232 *modules. Required infrastructure includes stormwater management features, and one concrete equipment pad. The access to the solar project will be from a gravel access road from Spencer Hill Road.*

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

This project is a zero-emissions renewable energy project. The energy will be used by the City of New London Board of Education through the Buy All Non-Residential Renewable Energy Solutions Program. As mentioned above, lease payments will be made to the landowners as a result of the solar project being placed on their land.

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.

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2) **Agricultural Resource Impacts**

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

The project area is a hay field and is currently being harvested by a tenant farmer. It has been a hayfield for three decades, since approximately when the current landowners purchased the property. The ability to have vegetable production on this site is limited due to the slope grade and potential for soil loss, however, Greenskies is hopeful that its Solar + Farming approach will allow for some crops to be grown at the project site.

It does not appear that the current use of the property (tenant hay farming) will be sustainable for the long term. The landowners have informed Greenskies that the payments made by the tenant farmer are insufficient to cover expenses associated with the farm. Over time, the haying of the site also has potential to deplete the soils. The combination of these two possibilities creates real risk that without the proposed project, the land will not stay farmland and may revert to residential development.

Thus, the Solar + Farming approach being proposed by Greenskies is anticipated to have benefits to the future farm's operations.

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

There will be no negative impact to production agriculture from the proposed project. The new use, the creation of a solar project with regenerative herb 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. Soil health will actually be improved by the regenerative practices employed on the solar site.

Greenskies contacted the USDA Natural Resource Conservation Service Torrington Field Office for recommendations for a dual-use solar project. Exhibit B presents the recommendations provided by USDA Torrington Field Office. They provided two recommendations: 1. Rotational Grazing with Sheep and 2. Keeping Beehives. For the second option, after the solar panels were installed, the field could be seeded into a mix of native perennial wildflowers and grasses beneficial to pollinators. USDA explained that the pollinator habitat would increase biodiversity, create a deep root system, mitigate soil erosion, and provide an excellent pollen source. Based on those recommendations Greenskies created the proposed project.

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In terms of USDA option #1; Grazing by cattle, pigs or horses is not possible because of the use intensity associated with those systems which would increase erosion potential on the land. Sheep grazing is a possibility, however, as discussed in greater detail below, Greenskies would prefer another agricultural activity to this one. If, however, Greenskies cannot successfully complete this proposal, sheep could be grazed at the project site.

The proposed option for the agricultural use is ideal to prevent soil erosion because the slope is on average 8% and up to 10 to 12% in some areas.

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).

Greenskies, in agreement with the landowner, has started working with USDA NRCS Litchfield County Conservation District to develop the selected agriculture use, land-based regeneration within the proposed project fence line of solar project.

Greenskies Clean Energy proposes regenerative land management of a Solar + Farming project through 1) planting of perennial herbs and botanical plants that would be harvested and sold, 2) planting of perennial cold season grasses, and 3) planting of pollinator friendly flowers and management of a honeybee apiary for honey sales. 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 and honey*
- *Overseeding as needed to maintain sufficient land coverage of plants*
- *Removal of invasive plants as needed*
- *General monitoring and upkeep of the soil, plant, and bee health*

A mix of herbs, botanicals, 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: mint, dandelion, mullien, oregano, purslane, red clover, rosemary, thyme, yarrow and lavender. In addition to the herbs that will be used for agricultural production, Greenskies will also review the Xeces Society guidance Pollinator Plants for Northeast Region and Pollinator Habitat Installation Guide to select supplemental plants for the project. The planting mix will also perform well for stormwater controls. 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. Assuming the Agricultural Experiment Station can obtain funding to assist Greenskies in this endeavor, Greenskies will work with the Agricultural Experiment Station to study

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exactly which herbaceous crops are best suited to a Solar + Farming approach.

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. The current design has a relatively high row to row spacing of 19.5 feet.*

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.*

In order to accomplish this undertaking, Greenskies has continued to build relationships with prospective farmers and have discussed this site with several potential partners as follows:

Potential Farmer	Date	Email
Hasseeb Khan	7/31/23	hasseebkh69@gmail.com
Mary Claire Whelan, New Farmer Alliance	6/23/23	newctfarmers@gmail.com
Member of New Farmer Alliance, "Laura"	7/6/23	Called from 4433622034
Terri Fassio	3/23/23	info@winchestergrange.org

As we discussed at our meeting, developing this type of agricultural use is a somewhat iterative process, and this is earlier than Greenskies has ever gotten involved in this level of detail for potential agricultural uses. 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

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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.

Greenskies does, however, understand the Department's concern that if Greenskies' proposal to conduct herb farming and work with the Agricultural Experiment Station as discussed in greater detail in Greenskies' previous submittal to the Department were to fail, the Department needs assurances that agriculture will remain integrated with this project's design, development, construction, and operation throughout 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 herb 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 regenerative herb 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 or 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. *Lifestock 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.

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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.

As discussed above, Greenskies will earmark a section of the project area in the range of 1 acre for long term research projects to better understand how agriculture can co-exist with solar projects. Research on the production of crops under PV Solar system is still relatively new. Greenskies is in early coordination with Connecticut Agricultural Experiment Station to determine how to best pursue such a research project. A CAES research study could likely encompass crop and variety trials, in which specific varieties of a selection of crops would be tested for production under the solar panels. The specific crops and varieties to be tested would be selected after a review of what crops have already been evaluated in similar field trials in New England, and from a list of crops and varieties are suited for more traditional agricultural production in New England. CAES suggested that the production of each crop variety would take place for a minimum of three growing seasons and various production metrics. As far as Greenskies knows, a study of this scope and breadth has not yet been completed anywhere in New England.

Soil testing would be performed, and local weather conditions would be monitored throughout the study. After the first three years of the study, variety trials could be completed on a new set of crops. The results of the study would provide crop recommendations for production under solar panels in Connecticut and may also result in some additional recommendations for best practices in the long term.

Research funding would be sought by CAES under programs that include specialty crops, agrivoltaics, and urban and emerging agriculture priorities. Although three are a variety of current programs that could fund this research study both at the state and national levels, the specific grants that are sought will depend on programmatic priority areas that match this research and the amount of funding available through a specific call for proposals. Funding for research would likely be sought in the 2024 or 2025 cycles, so that the research study could begin after the solar project has been built.

A potential option that is being considered for research is to work with a USDA NRCS conservation planner to use their new practice for soil health testing called CEMA 216. The goal of the practice is to evaluate and monitor soil health related to a specific goal. The goal of the soil health testing will be improving soil health for growth of perennial crop species within the fence line of the project.

Prior to the earmarked land being used for the research study, it will be farmed in the same way described for the balance of land.

3) **Alternatives to Locating the Energy Project on Prime Farmland**

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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).

The current owners of the property have no desire to sell their development rights for the property. The land on the property not being proposed for development with Solar + Farming, that is not prime farmland/statewide important farmland soil, is instead Forestland Habitat designated by Connecticut DEEP Division of Forestry and currently being used as a wood lot and classified PA490 land. The landowner intends to maintain the forestland in its current state.

Previously, the owners of the property pursued the option of developing the farmland area for residential development. After this agrivoltaic approach was presented to them, they decided that Solar + Farming is a more viable path. If this path is denied to the landowners, it is possible that they will revisit their decision with respect to residential development.

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).

GCE and the landowner examined the entire project site. Due to other site constraints (e.g. wetlands high groundwater table, forestland habitat), there are currently no other viable on-site alternatives for the solar energy facility. The site constraints are detailed in the attached map of the proposed project site Exhibit C *Forestland Habitat map.*

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. In addition, at the time that the project is decommissioned, Greenskies is of the opinion that the soil quality will be better at the end of the life of the project than it would be if the site is to remain in its current state.

Greenskies is putting forward this project because it believes that it represents one of the best ways that solar and agriculture can co-exist. Sheep grazing is a valuable approach, to be sure, but there are other alternatives to grazing of livestock that should be considered. 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.

Based on the foregoing, 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 the prime farmland soils of the site.

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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,

Jean-Paul La Marche
VP of Development
Greenskies Clean Energy
Jean-paul.lamarche@greenskies.com
(720)638-6553

EXHIBITS

A. Prime Farmland Soil Map

B. USDA Recommendation Letter Regarding Agricultural Uses

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EXHIBIT A
Prime Farmland Soil Map

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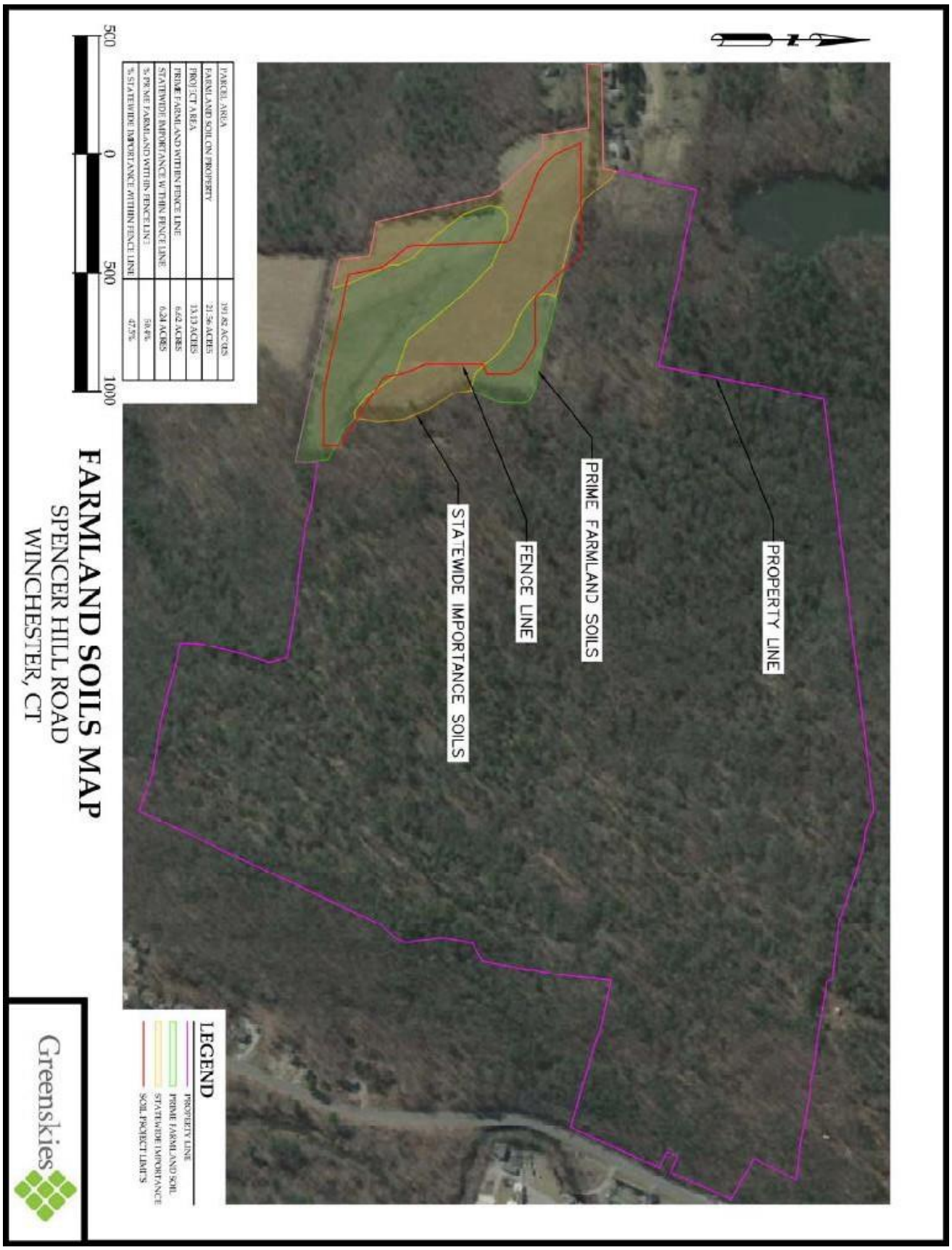

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EXHIBIT B
USDA Recommendation Letter Regarding Agricultural Uses

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Technical Assistance Recommendations

For: Green Skies Solar, Bonnie Potocki, Dennis Hicks

Recommendations By:
Sarah Ammirato, Soil Conservationist
sarah.ammirato@usda.gov or 860-618-4535

USDA Natural Resource Conservation Service
Torrington Field Office
1185 New Litchfield Street Torrington, CT 06790

Background Information:
After a discussion with Bonnie Potocki and Dennis Hicks, I reviewed contour maps, soils maps and site pictures to make recommendations for a dual-use solar project.
The site for the planned solar field is a hay field with a plant community of cool season grass. The soils description is approximately 88.2% prime farmland soils and farmland of Statewide importance, Paxton and Montauk fine sandy loam.
Characteristics of the Paxton soil is typically well-drained in the medium runoff class. Runoff class is determined by permeability of the soil type as well as field slope which estimates the potential for surface runoff to occur during a rain event.
Using a 2 ft contour map, I estimate the slope is 8% average and 10-12% in some areas, with less slope in the center and greater slope on the field edges. After reviewing topography and soils maps, I would suggest against farming annually tilled vegetables. I also recommend not grazing cattle, pigs, or horses because of the level of intensity associated with those systems.

Recommendations for the Green Skies Solar Project:
Alternative 1: Rotational Grazing with Sheep
A tenant farmer will be identified and allowed to pasture sheep during the grazing season, May 1st – October 31st.
Once a tenant farmer is identified, it is recommended they work with USDA NRCS to develop a Grazing Plan. This is a comprehensive document that analyzes forage supply and livestock demand. A Grazing Plan includes recommendations for rest periods, number and size of paddocks and contingency plans in the case of drought, mud, etc.
If this alternative is selected, infrastructure will need to be installed to facilitate rotational grazing. Perimeter fencing, to keep predators out and livestock in the grazing area is needed.
Temporary electric fencing (polywire netting, see above photo) is recommended within the solar field to create smaller paddocks that will move every day. Temporary electric fence can be charged using a small solar charger (see below photo).

A water source for the sheep is required. Quality, clean water is necessary for any livestock species. A water trough with a float valve is needed to ensure there is always water available.
According to North Dakota Extension, "livestock water requirements vary significantly depending on the species. Water consumption is influenced by several factors, including age, rate of gain, pregnancy, lactation, activity, type of diet, feed intake and environmental temperature".

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Technical Assistance Recommendations

See Table 4 below for estimates of water intake for sheep. These estimates should be increased during peak summer months.

Table 4. from literature published from North Dakota State University Extension.

Sheep

Table 4 lists water requirements for different categories of sheep. Sheep are able to obtain most of their water requirements from forage consumption. In addition to weight and level of production, water intake also increases in response to increases in environmental temperature.

Table 4. Water intake (gallons per head per day) for sheep.

Table 4. Water intake (gallons per head per day) for sheep.		
Class	Weight	Water intake
	(lbs)	
Lambs	5 to 20	0.1 to 0.3
Feeder lambs	60 to 110	1.0 to 1.5
Pregnant ewes	175 +	1.0 to 2.0
Lactating ewes	175 +	2.0 to 3.0
Rams	175 +	1.0 to 2.0

Alternatives for adequate water quantity and quality include

1. Drilled well with pump and hydrant to attached above ground hose and trough. This option provides a clean, reliable water source throughout the entire grazing season. This is a preferred alternative.
2. Rainwater from stormwater basins. Water is filtered and pumped into a cistern for storage and distributed to troughs with above ground water line. This option may require water testing/treatment and is not reliable during drought.
   Water stored in above ground cisterns for extended periods of time can lead to concerns of bacteria growth, and if exposed to sunlight, temperature concerns. This is not a preferred alternative.
3. Water transported from off site location. Farmer would need alternate water source (from home farm) to fill water tanks and transport daily to fill troughs. This provides a reliable source, but additional labor and management of the tenant farmer.

This alternative will require a high level of management and education of the tenant farmer. Given the topography and slope, daily animal moves are recommended. The flock will not graze an area for more than 24 hours. This grazing strategy will reduce soil compaction and degradation as much as possible.

Rest periods are required to allow the forage adequate time to recover. At minimum, a 30-day rest period should be followed before returning to the same paddock. Rest periods may change throughout the grazing season and is dependent on forage regrowth. This information will be outlined in an NRCS Grazing Plan.
The forage height will need to be monitored and should not be grazed below 4 inches minimum. Sensitive areas will also be identified after a more in-depth site review. These include areas of the field that are seasonally wet or saturated. These areas will be identified in a Grazing Plan and will require different management.

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Technical Assistance Recommendations

Alternative 2: Keeping Beehives

After the solar panels are installed, the field could be seeded into a mix of native perennial wildflowers and grasses beneficial to pollinators. This would increase biodiversity, create a deep root system, mitigate against soil erosion, and provide an excellent pollen source. Once seeded, the pollinator plot will take about 2 years to establish.

A list of native wildflowers suitable for this project can be found on Connecticut Botanical Society website.

A farmer/beekeeper would bring their hives to the property and collect honey as it is produced throughout the year.

Required infrastructure would include perimeter fencing to keep predators out, a small square of polywire fencing surrounding the hives and a solar charger. Maintenance would include a delayed mowing, once a year after September 1st, not to disrupt grassland nesting birds. A delayed mowing ensures that the selected plants can reach flowering stage and provide the most nutritional value to pollinators.

Reseeding may be necessary after 5-10 years. No pesticides or herbicides should be used.

Overall management and infrastructure are minimal while having great benefits for wildlife, soil, and the land.

For additional information regarding above recommendations, please reference the following resources.

Xerces Society – Pollinator Planting Installation Guide for Pennsylvania and New England
15-025_02_XercesSoc_HabitatInstallGuide_Pennsylvania_ConservationCover327_web.pdf

NRCS – Pollinator Initiative
The Importance of Pollinators | Natural Resources Conservation Service (usda.gov)

Connecticut Botanical Society – List of Native Wildflowers
Wildflowers (ct-botanical-society.org)

Penn State Extension - Sheep Grazing to Maintain Solar Energy Sites
Sheep Grazing to Maintain Solar Energy Sites in Pennsylvania (psu.edu)

North Dakota State University – Livestock Water Requirements
Livestock Water Requirements — Publications (ndsu.edu)

Oregon State Extension – What is Rotational Grazing?
Rotational Grazing (oregonstate.edu)

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CONNECTICUT DEPARTMENT OF AGRICULTURE
450 Columbus Blvd, Suite 701 | Hartford, Connecticut 06103 | 860.713.2500
Office of the Commissioner
Affirmative Action/Equal Employment Opportunity Employer

October 3, 2023

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

Re: Greenskies Clean Energy, LLC – Spencer Hill Road, Winchester, proposed 3.7-Megawatt AC solar project

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…"

This project will be located on Spencer Hill Road in Winchester, on land owned by Frank Ahern and Karen Merete. The entire 190.38-acre parcel contains approximately 21.5 acres of prime farmland soils and 13 acres of statewide important farmland soils. The proposed solar facility will occupy approximately 13 acres, all of which are classified as prime farmland soils. The project area is currently leased to a tenant farmer who grows hay to feed an offsite herd of beef cattle. The project area has been used as a hay field since 1993.

In a letter to the Department of Agriculture (DOAG), dated August 14, 2023, and follow up information contained in an email dated September 13, 2023, the developers (Greenskies Clean Energy, LLC) have submitted a revised proposal stating that they intend to develop this project with co-uses which include commercial herb farming, pollinator-friendly ground cover, and beekeeping on approximately 12 acres. Greenskies also plans to partner with the Connecticut Agricultural Experiment Station to conduct research on the production of crops under photovoltaic panels on the remaining one acre. A letter of intent has been provided by Leigh Whittinghill which details plans to perform crop trials and soil testing, with the stipulation that this project is dependent upon securement of funding.

Based on preliminary information provided to DOAG (enclosed), and the successful implementation of the co-uses described above, the Department of Agriculture concludes this project will not materially affect the status of project land as prime farmland.

This determination is conditioned upon:

1. Execution of the aforementioned field research project.
    a. A minimum of one (1) acre within the Generation Footprint must be used for Agrivoltaics research for the lifetime of the project
2. The dual-uses described above operating on the project site for the life of the project, including:
    a. Production agriculture of row crops (herbs) by a commercial farmer(s) on a minimum of ten (10) acres within the Generation Footprint
    b. Harvesting of honey by a commercial farmer

    c. Overseeding as needed to maintain sufficient land coverage of plants
    d. Beekeeper and crop farmer shall have 24/7 access to the site
3. Planting and maintenance of pollinator habitat between the perimeter fence and the limits of the agricultural dual-use.
    a. Although pollinator habitats are not in and of themselves considered a dual use, DOAG recommends that native pollinator plant species be established between the perimeter fence and the limits of the solar array. If solar grazing is selected in whole or part as an agricultural dual use, then a species-specific pollinator friendly forage mix with nutritional health considerations should be selected as ground cover.
4. Maintenance of the project area, including:
    a. Proper soil preparation must take place including preliminary soil testing, followed by repeated testing every 2-3 years and the incorporation of soil amendments as needed
    b. Removal of invasive plants as needed
    c. No debris from construction shall be left in the array
    d. That there will be no grading, cutting or filling, topsoil removal, or other actions associated with the project's installation and ultimate deconstruction after 20 to 30 years
    e. Any fill imported onto the parcel must be selected by a soil scientist as appropriate for the selected agricultural use
5. The height and spacing of panels must accommodate crop-specific needs for sunlight, farm machinery, and worker accessibility.
    a. Row spacing of 19.5 feet, as proposed by Greenskies, must not be diminished
6. The solar developer shall grant any person authorized by the State of Connecticut access to the Project Site for research and data collection related to Agrivoltaics for the lifetime of the Project, with advanced notice of site visits.
7. The solar developer shall allow a representative of the Commissioner of Agriculture to conduct a site visit on an as needed basis to confirm compliance with planned activity on the site.

The Department of Agriculture would also like to express its concerns to the Connecticut Siting Council regarding enforcement of a dual-use for the duration of the project and proposes a bond to cover all costs associated with stewardship including inspections and enforcement.

The Department of Agriculture will continue to monitor the proposed project and should changes or additions to the proposal raise concerns to the Department, we reserve the right to modify our position on this project, including opposing it, as detailed plans are provided by the developers.

If you have any questions, please feel free to contact Eileen Underwood of my staff. Eileen can be reached at eileen.underwood@ct.gov or at (860) 819-0580.

Sincerely,

Bryan P. Hurlburt
Commissioner

Enc.

Cc: Katie Dykes, Commissioner, Department of Energy and Environmental Protection
Bonnie Potocki, Project Developer, Greenskies

Dennis Hicks

From: Underwood, Eileen <Eileen.Underwood@ct.gov>
Sent: Tuesday, October 31, 2023 12:33 PM
To: Jean-Paul LaMarche; Hoffman, Lee D.; Smith, Jaime; Briggs, Carole; Lalime, Holly; Dennis Hicks
Cc: Stone, Chris
Subject: RE: Greenskies Winchester Project Consideration
Attachments: Greenskies Winchester REVISED Solar Response bh 10.4.23.pdf; Update Letter to re ag use Winchester CT 8.14.23.pdf; Fill Management Plan for Solar Projects.pdf

[External Sender]

Good afternoon Jean-Paul,

It has been determined that stormwater questions should be directed to your DEEP contact Chris Stone. Please feel free to cc' me on that correspondence. If you need to request a change to the DOAG letter then an official change request must be made, and the Connecticut Siting Council notified.

If a change is being requested, please submit a revised PDF application, which includes the following information:

1. Specify which line item of the letter you are requesting fall under review
2. Fill Management Plan (the relevant attached PDF was developed for SCEF and shows the kind of information we will be looking for)
3. A map showing the location of stormwater related project work overlaid over soils classification

Kind Regards,
Eileen

From: Underwood, Eileen
Sent: Monday, October 30, 2023 12:41 PM
To: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

Good afternoon Jean-Paul,

I expect to have an update for you by tomorrow.

Kind Regards,
Eileen

From: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>
Sent: Friday, October 27, 2023 2:21 PM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

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.

Hi Eileen, are you please able to provide us with a response today? Are there any issues that you need clarification from us on?

Thanks.

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Mdq0sdxc1dd1p dufkhC juhhqvnlhv1frp #
kwws=22z z z 1juhhqvnlhv1frp #
+:53,96;09886#

From: Jean-Paul LaMarche
Sent: Wednesday, October 25, 2023 2:59 PM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

Hello Eileen, Are you still expecting to have a reply this week?

Thanks.

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YS#ri#Ghyhorsp hqw#
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Mdq0sdxc1dd1p dufkhC juhhqvnlhv1frp #
kwws=22z z z 1juhhqvnlhv1frp #
+:53,96;09886#

From: Underwood, Eileen <Eileen.Underwood@ct.gov>
Sent: Wednesday, October 18, 2023 10:19 AM
To: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

[External Sender]

Thank you. I anticipate having a reply for you next week once some of our staff return to the office.

From: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>
Sent: Wednesday, October 18, 2023 11:56 AM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks

<dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

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Hello, the footprint of the basins' design is .493 acres.

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kwws=22z z z 1juhhqvnlhv1frp #
+:53,96;09886#

From: Underwood, Eileen <Eileen.Underwood@ct.gov>
Sent: Wednesday, October 18, 2023 7:08 AM
To: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

[External Sender]

Good morning Jean-Paul,

I hope to have an answer for you soon. You mention the approximate size of each proposed stormwater basin in feet, do you have an acreage estimate for construction activities directly related to stormwater?

Kind Regards,
Eileen

From: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>
Sent: Tuesday, October 17, 2023 4:09 PM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

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Hello Eileen, do you have any updated response based on my recent feedback? Thanks.

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kwws=22z z z 1juhhqvnlhv1frp #
+:53,96;09886#

From: Jean-Paul LaMarche
Sent: Tuesday, October 10, 2023 4:51 PM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

Good Afternoon Eileen,

On April 17th, 2023 GCE had a Pre- Application Meeting with the CT DEEP Concierge office. The Stormwater Program sent Chris Stone as a representative and the contact for our project. During the meeting we discussed the need for the Stormwater General Permit and our plans for stormwater management on site.

The slopes of the project are between 8% 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

During the Pre Application meeting the possibility of grassy swales was discussed as an alternative to basins. This was disputed based on the need for basins in place of swales in order to meet the permit requirements. Swales would carry runoff sediments into wetlands and increase the intensity of the flow of stormwater into the wetlands. This would exacerbate erosion and not meet the stormwater permit requirements. CT DEEP and the project engineer agreed with this conclusion.

We are proposing 3 stormwater basins, 2.5ft deep, with side slopes of a ratio of 3:1 and lengths of 157ft, 175ft, 250ft. The total moved earth is 1,100 cubic yards. They all will have a 4ft high berm on the downslope side.

Attached is correspondence with CT DEEP, as well as site plans detailing the Stormwater Basins.

Thank you,

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From: Underwood, Eileen <Eileen.Underwood@ct.gov>
Sent: Tuesday, October 10, 2023 6:12 AM
To: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

[External Sender]

Good morning Jean-Paul,

Please provide us with more information on the site plans including the size and location of stormwater basins and any relevant correspondence with DEEP.

Thank you,

Eileen Underwood (she/her) | Environmental Analyst II
Connecticut Department of Agriculture | www.CTGrown.gov
Agricultural Development & Resource Conservation
450 Columbus Blvd, Suite 703, Hartford, CT 06103

From: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>
Sent: Friday, October 6, 2023 12:31 PM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

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Hello Eileen, thank you for providing the response.

I have one clarification question. The proposed project has no grading, cut, or fill needed for the installation of the solar equipment. Per the requirements of the DEEP stormwater general permit it is required that the project has stormwater control and treatment basins to prevent any construction runoff from leaving the site. Can you please confirm that the small amount of earth moving that is needed for the stormwater basins to satisfy State requirements is acceptable under the conditions you proposed?

Thank you.

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Mhdq0sdxc1dp dufkhC juhhqvnlhv1frp #
kws=22z z z 1juhhqvnlhv1frp #
+:53,96;09886#

From: Underwood, Eileen <Eileen.Underwood@ct.gov>
Sent: Wednesday, October 4, 2023 8:14 AM
To: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

[External Sender]

Good morning Jean-Paul,

A letter was sent to the Connecticut Siting Council this morning, which I have reattached here for your convenience.

Please contact me with any questions.

Kind Regards,
Eileen

From: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>
Sent: Monday, October 2, 2023 1:02 PM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

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Hello Eileen, it has been a week, do you have an update?

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Mdq0sdxcdp dufkhC juhhqvnlhv1frp #
kwws=22z z z 1juhhqvnlhv1frp #
+:53,96;09886#

From: Underwood, Eileen <Eileen.Underwood@ct.gov>
Sent: Monday, September 25, 2023 11:09 AM
To: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

[External Sender]

Good afternoon Jean-Paul,

Our agency is finalizing its review of your proposed solar project, and I anticipate having an update for you within the next week.

Kind Regards,
Eileen

From: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>
Sent: Tuesday, September 19, 2023 1:22 PM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

Hello Eileen, Do you know when you will have a complete response to us?

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kwws=22z z z 1juhhqvnlhv1frp #
+:53,96;09886#

From: Jean-Paul LaMarche
Sent: Wednesday, September 13, 2023 9:29 AM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

Hello Eileen, in short, the entire area of the solar project is intended to be used for the farming purposes. With the exception of the possible research area the site will not be broken into explicit areas for the three aspects, but they would be interspaced together. The grasses are to fill in and prevent bare ground for areas that do not have other plants. The pollinator flowers would be within fence line but exterior to the array area to prevent shading. The exact location of different species would also have to change over time to allow for resting of soiling and rotation of crops.

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Mhdq0sdxc1dp dufkhC juhhqvnlhv1frp #
kwws=22z z z 1juhhqvnlhv1frp #
+:53,96;09886#

From: Underwood, Eileen <Eileen.Underwood@ct.gov>
Sent: Wednesday, September 13, 2023 7:44 AM
To: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>; Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Smith,

Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

[External Sender]

Good afternoon Jean-Paul,

Thank you for reaching out, our department has been reviewing your revised project proposal and is in the final stages of project consideration.

In section 2.c. of your proposal you specify that:
"Greenskies Clean Energy proposes regenerative land management of a Solar + Farming project through 1) planting of perennial herbs and botanical plants that would be harvested and sold, 2) planting of perennial cold season grasses, and 3) planting of pollinator friendly flowers and management of a honeybee apiary for honey sales."

Could you please elaborate on the following questions regarding acreage division between the three proposed activities:

1. How many acres do you plan to farm for perennial herbs?
2. How many acres would be dedicated to a pollinator habitat?
3. What remaining project footprint would be maintained as grass?

Thank you.

Kind Regards,
Eileen

From: Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>
Sent: Monday, September 11, 2023 1:00 PM
To: Hoffman, Lee D. <LHoffman@PULLCOM.COM>; Underwood, Eileen <Eileen.Underwood@ct.gov>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

Some people who received this message don't often get email from jean-paul.lamarche@greenskies.com. Learn why this is important

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Hello Eileen, it has been about a month since we provided you our revised agriculture co-use plan for this solar project in Winchester. Are you able to provide a response?

Thanks.

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Mhdq0sdxc1dp dufkhC juhhqvnlhv1frp #
kwws=22z z z 1juhhqvnlhv1frp #
+:53,96;09886#

From: Hoffman, Lee D. <LHoffman@PULLCOM.COM>
Sent: Monday, August 28, 2023 11:55 AM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Jean-Paul LaMarche <jean-paul.lamarche@greenskies.com>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

[External] Do not open links or attachments before confirming sender email and content is safe.

Eileen,

Attached is a copy of the Forestland Habitat Impact Map, which was referenced as Exhibit C in our prior correspondence. Please note that Bonnie Potocki is no longer employed by Greenskies, so I removed her from this list.

Please advise as to when we might expect a response from the Department.

Best regards,
Lee

Lee D. Hoffman, Esq.
Pullman & Comley LLC
T 860 424 4315 • lhoffman@pullcom.com

From: Underwood, Eileen <Eileen.Underwood@ct.gov>
Sent: Friday, August 25, 2023 2:03 PM
To: Hoffman, Lee D. <LHoffman@PULLCOM.COM>; bonnie.potocki@greenskies.com; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Jean-Paul La Marche - Clean Focus Renewables Inc (jean-paul.lamarche@greenskies.com) <jean-paul.lamarche@greenskies.com>; Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

Good Afternoon,

Thank you for providing the Connecticut Department of Agriculture with an updated project proposal. In your response to question 3.b. there is reference to a missing attachment named "Exhibit C Forestland Habitat map". Can you please provide us with a copy? Without complete information we are unable to make a decision at this time.

Kind Regards,
Eileen

From: Hoffman, Lee D. <LHoffman@PULLCOM.COM>
Sent: Monday, August 14, 2023 3:21 PM
To: Underwood, Eileen <Eileen.Underwood@ct.gov>; bonnie.potocki@greenskies.com; Smith, Jaime <Jaime.Smith@ct.gov>; Briggs, Carole <Carole.Briggs@ct.gov>; Lalime, Holly <Holly.Lalime@ct.gov>; Jean-Paul La Marche - Clean Focus Renewables Inc (jean-paul.lamarche@greenskies.com) <jean-paul.lamarche@greenskies.com>;

Dennis Hicks <dennis.hicks@greenskies.com>
Subject: RE: Greenskies Winchester Project Consideration

Thanks again for taking the time to talk to us last week. As promised, we are providing you with more detail around our plans for the Solar + Farming uses at the site. The attached letter should provide you with that detail.

If you have any questions, please feel free to reach out to us.

Regards,
Lee

Lee D. Hoffman, Esq.
Pullman & Comley LLC
T 860 424 4315 • lhoffman@pullcom.com

-----Original Appointment-----
From: Underwood, Eileen <Eileen.Underwood@ct.gov>
Sent: Monday, July 31, 2023 11:53 AM
To: Underwood, Eileen; Hoffman, Lee D.; bonnie.potocki@greenskies.com; Smith, Jaime; Briggs, Carole
Cc: Lalime, Holly
Subject: Greenskies Winchester Project Consideration
When: Wednesday, August 9, 2023 1:00 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Meeting to further discuss the proposed agrivoltaics project in Winchester, and in direct response to an email sent by DOAG on 7/5/23, copied below:

Good Morning,

DOAG has reviewed your client's project proposal and supplemental materials for the intended solar development on Spencer Hill Road in Winchester. Based on the application and follow up correspondence from May 25, DOAG has determined that your client's current plans are not sufficient to obtain a Letter of No Material Impact.

We are open to reviewing amendments to the current project plans. As it stands, the main impacts of concern are as follows:

1. There is no clear commitment to continue farming operations for the duration of the 20 year solar project.

2. Funding is not secured for the Connecticut Agricultural Experiment Station research project.
3. Details surrounding plans for commercial herb farming are insufficient. While a link to a list of shade friendly herbs was provided, no clear plan has been developed, nor farmer selected or business plan established.
4. Any proposed dual use agrivoltaics system needs to include design parameters that accommodate the specific farming practice for row crops or livestock including raising panels and spacing rows to allow for continued agriculture, and determining the sunlight needs of the shade friendly crops, if selected.
5. Claims that a solar development will increase soil health are unfounded. Use of the area as a hay field with proper management is optimal for reducing erosion and protecting the soil. Developing solar on steep slopes creates an environment for soil erosion by stripping vegetative cover for ground mounted installations.

Microsoft Teams meeting

Join on your computer, mobile app or room device

Click here to join the meeting

Meeting ID: 295 261 005 539
Passcode: gAtt6e

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