

To: Interested Parties

Memo Regarding Excelsior Solar Project Impacts on Zuber Farms, LLC

April 2, 2022

I have been asked to comment on the above reference subject matter. Zuber Farms generates roughly \$14 million in farm gate sales of milk per year. Past studies by the PA Center for Dairy Excellence of the multiplier effect of dairy farms on a community range between two and four times the economic impact of the farm. For Zuber Farms in Genesee County, this would mean \$28 to \$56 million in economic impact on the community.

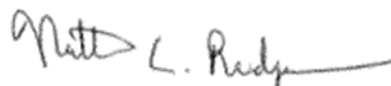
Land availability in close proximity to active dairy farms is critical to their success. As both a source of forage crops for feed, and as a place for manure to be spread at agronomic rates, a loss of 500 acres of farmland will likely result in Zuber Farms being forced to downsize by at least a third if the solar project is approved.

As a result, Zuber Farms has had to put plans on hold, including the use of a system of portable pumps, permanent pipeline and dragline technology to efficiently apply manure at agronomic rates to 500 acres of the proposed solar site. Zuber's currently average 90,000 gallons of manure production per day, the equivalent of twelve semi loads. Forced to spread manure by truck vs. through pump and dragline, creates tremendous wear on the Town roads, which are a burden to local residents in road repair costs. Previous expenditures for installation of dragline pipelines will be lost. These added expenses, not to mention the increased costs of labor and fuel for obsolete manure application practices, threatens the viability of the Zuber operation at this location.

Additionally, Zuber Farms has delayed the decision on where and under what conditions to build a manure storage lagoon, the subject of a sizable potential grant award, due to uncertainty about availability of farmland for manure application. While manure storage does result in the potential to produce more methane than daily spreading, water quality concerns led to the development of a system of storage and application prior to and during the growing season, at agronomic rates, to land where a forage crop will be grown. Removing land from production imperils that system. Zuber Farms would have entertained a project which would collect the methane from their storage lagoons and market it to renewable natural gas projects across the US. This project is also in jeopardy as a result of the loss of land on which to apply post digested manure.

Other infrastructure impacts of note include the loss of water management systems both for drainage and irrigation, and potential wear of roadways in the area from increased traffic.

Respectfully Submitted:

A handwritten signature in black ink, appearing to read "Nathan L. Rudgers". The signature is written in a cursive style with a long horizontal stroke at the end.

Nathan L. Rudgers
Business Consultant