



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

September 17, 2021

TO: Service List dated August 19, 2021

FROM: Melanie Bachman, Executive Director **NAB**

RE: **DOCKET NO. 505** – Haddam Quarter Solar, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 2.8-megawatt-AC solar photovoltaic electric generating facility located south of Haddam Quarter Road and north of Johnson Lane, Durham, Connecticut and associated electrical interconnection.

Comments have been received from The State of Connecticut Department of Agriculture on September 16, 2021. A copy of the comments is attached for your review.

MB/RDM/lm

c: Council Members



STATE OF CONNECTICUT
DEPARTMENT OF AGRICULTURE
 Office of the Commissioner



Bryan P. Hurlburt
 Commissioner

860-713-2501
 www.CTGrown.gov

September 16, 2021

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



Re: Docket No. 505 – Haddam Quarter Solar, LLC

Dear Executive Director Bachman:

The Department of Agriculture has the following comments on Docket No. 505, an application for a Certificate of Environmental Compatibility and Public Need for Haddam Quarter Solar, LLC.

The project is a 2.8 megawatt project located on a 49-acre parcel which runs between Haddam Quarter Road and Johnson Lane in the town of Durham. The developer, Louth Callan Renewables (LCR) through their consultant (All-Points Technology), has stated in its filings with the Council that the parcel contains 21.4 acres of prime farmland. The developer states that the project footprint is 10.9 acres, of which 7.7 acres are designated as prime farmland (approximately 36% of the prime farmland on the parcel).

Section 3.6.1 of the Environmental Assessment (submitted as Attachment 9 of the application) states that the majority of the site has remained undeveloped and used for agriculture since the 1700s. The Environmental Assessment states that the applicant is proposing minimally intrusive methods for project construction, and that topsoil removed from disturbed areas will be segregated from underlying soil horizons. Further, the Environmental Assessment states that topsoil will be stockpiled and used as top dressing for re-establishing vegetation, and that no topsoil will leave the site.


While the above measures are helpful, they are in no way a replacement for agricultural activities that have been taking place on the parcel, by the developer’s own admission, since the 1700s. This proposal has no co-use plan incorporated at all and proposes nothing to offset the impact of the loss of 7.7 acres of prime farmland due to the solar project.

Given the inequity between this proposed project and that of other similarly sized solar projects, we urge the Siting Council to engage the developers for Haddam Quarter Solar, LLC to ensure there is an appropriate and acceptable agricultural co-use plan incorporated into the project. By engaging in this discussion, it will ensure a consistent approach for all projects that impact prime farmland. Regardless of the process used for application, (full certificate or a petition for declaratory ruling), developers should be encouraged, or even expected, to establish an

agricultural co-use plan into the project to continue agricultural operations and conserve the limited resource that is farmland.

As a result of the above deficiency, the Department of Agriculture cannot support this project as proposed. If you have any questions, please feel free to contact Stephen Anderson on 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 written in a cursive style with a large initial "B".

Bryan P. Hurlburt
Commissioner

Enc.

Cc: Katie Dykes, Commissioner, Department of Energy and Environmental Protection
Kenneth C. Baldwin, Esq., Robinson & Cole LLP