



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

April 6, 2021

TO: Service List, dated February 26, 2021

FROM: Melanie Bachman, Executive Director *MAB*

RE: **PETITION NO. 1443** - SR North Stonington, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 9.9-megawatt AC solar photovoltaic electric generating facility on five parcels located north and south of Providence New London Turnpike (State Route 184), west of Boombridge Road and north of Interstate 95 in North Stonington, Connecticut, and associated electrical interconnection.

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Comments have been received from The State of Connecticut Department of Agriculture on April 6, 2021. A copy of the comments is attached for your review.

MB/MP/lm

c: Council Members



**STATE OF CONNECTICUT**  
**DEPARTMENT OF AGRICULTURE**  
Office of the Commissioner



Bryan P. Hurlburt  
Commissioner

860-713-2501  
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April 6, 2021

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

Re: PETITION NO. 1443 - SR North Stonington, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 9.9-megawatt AC solar photovoltaic electric generating facility on five parcels located north and south of Providence New London Turnpike (State Route 184), west of Boombridge Road and north of Interstate 95 in North Stonington, Connecticut, and associated electrical interconnection.

Dear Executive Director Bachman:

Thank you for the opportunity to comment on the above referenced Petition for Declaratory Ruling. This project is to be located on five separate parcels, totaling approximately 157 acres in the town of North Stonington. The developers state that the limits of disturbance are approximately forty-seven (47) acres. Of the acreage within the proposed limit of disturbance, the developers state that there are approximately 0.5 acres of mapped prime farmland, and 0.2 acres of mapped statewide important farmland soils.

Although our review of soil mapping within the project area confirms that the material affect to mapped prime and statewide important farmland should be minimal, the department does have the following comments on this petition.

The loss of Connecticut farmland negatively impacts our efforts to combat food insecurity, increases the importation of human food and animal feed from outside of our state, and results in a larger carbon footprint. Well managed agricultural lands can store significant carbon and will play an important role in climate change mitigation.

In addition to taking agricultural lands out of production, impacts from this solar project include disturbances to the farmland caused by the use of heavy equipment, such as: holes drilled to install metal support posts, trenching for electrical conduits, surface grading, and the construction of access roads and equipment pads. These manipulations and changes have an adverse impact on the upper 24 inches of the soil which are critical to plant growth and will have negative consequences for any future agricultural productivity.

Prime and important farmland soils are recognized federal, state and locally significant natural resources, and through its adoption of Public Act 17-218, our legislature has formally

acknowledged the importance of these resources. While aspects of this public act do not directly affect this petition, the Department of Agriculture believes it is important to document and make part of the record our concerns about the impacts this project will have on farming and agriculture.

The developers have proposed an “Integrated Vegetation Management Plan” which incorporates certain vegetation management objectives and adaptive multi-paddock sheep grazing, but there is little in the way of detail surrounding either of these initiatives, especially assurances that these initiatives will be budgeted for, and continue for the life of the project. It is unclear how these plans would preserve or protect the prime farmland a statewide important farmland.

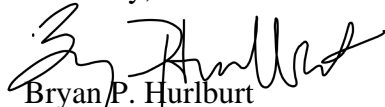
We continue to believe that this petition should give more consideration to other strategies to minimize impacts to prime farmland.

The Department of Agriculture has the following recommendations to the siting council:

- 1) The siting council should investigate whether the project could be located elsewhere on the property (in whole or in part) to minimize impacts to prime farmland. Since the disturbance limits of the proposed project are to be on only about half of the property, alternative configurations should be considered that would allow for no disturbance of the most valuable farmland on the parcel.
- 2) The siting council could also consider looking to the developers of this project for other options that would serve to lessen the project’s impacts to agricultural resources. Examples of these options include the following measures:
  - a. Plan the project’s structural design in a way that might allow for cultivation of crops within the project footprint.
  - b. Permit livestock in and around the solar project area.
  - c. Provide pollinator habitat and/or apiary space.
  - d. Provide space for a community garden area.
  - e. Provide dedicated acreage for use by new farmer(s).
  - f. Reduce the overall footprint of the project through a more efficient design.

Thank you for the opportunity to comment on this project. If you have any questions, please feel free to contact either me, or Stephen Anderson in our Resource Conservation Unit. Steve can be reached at [Stephen.Anderson@ct.gov](mailto:Stephen.Anderson@ct.gov) or (860) 713-2592.

Sincerely,

  
Bryan P. Hurlburt  
Commissioner

Cc: Katie Dykes, Commissioner  
Department of Energy and Environmental Protection