



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

July 24, 2024

Keith Ainsworth
Acting Chair

Christopher Donnelly

David Kalafa

S. Derek Phelps

Denise Rodosevich

Charles Vidich

William Warzecha

Paul Aresta
Executive Director

Bryan Hurlburt, Commissioner
Connecticut Department of Agriculture (DOAG)
450 Columbus Blvd., Suite 701
Hartford, CT 06103
Bryan.Hurlburt@ct.gov

Re: Clean energy projects on agricultural land

Commissioner Hurlburt:

The Council on Environmental Quality (Council) supports the development of clean energy projects on appropriate sites in Connecticut and advocates for the continued use or preservation of important farmland in the state. As stated in the Council's most recent comments to the Connecticut Department of Energy and Environmental Protection (DEEP) for the Shared Clean Energy Facilities (SCEF) Program Year 6 (attached), "the Council does not support a bid preference for solar development on "important farmland" for commercial (front of the meter) applications for the SCEF Program because such a bid preference could result in the greater loss of "important farmland" in the state".

DEEP's request for comments regarding the SCEF program stated that "DOAG recommends that the following requirements for projects sited on Prime Farmland, inclusive of but not limited to projects seeking the bid preference for vertical bi-facial solar Panels". The Council has the following comments regarding some of the proposed requirements:

- *Attest that the Bidder will ensure the Parcel is continuously farmed throughout the life of the array.*

The Council recommends that "continuously farmed" be better defined with minimum standards (e.g.: would one sheep roaming the property suffice? If not, how many would?) and that there be provisions or mechanisms to ensure compliance. While the DOAG's Requirements for Solar Grazing Properties¹ appropriately address Site Requirements, Livestock Health and Wellness, and Education and Training, the Council recommends that solar developers also provide a livestock assessment to ensure that there will be adequate numbers of livestock for the proposed solar project and existing projects "throughout the life of the array."

- *Attest that the Bidder 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 advance notice of site visits.*

The Council recommends that “lifetime of the Project” explicitly include the period of decommissioning and soil restoration.

Thank you in advance for your consideration of the Council’s comments.

Respectfully,

Keith R. Ainsworth

Keith Ainsworth, Esq.
Acting Chair

¹ Connecticut Department of Agriculture, Requirements for Solar Grazing Properties; https://portal.ct.gov/-/media/doag/adarc/solar/requirements-for-solar-grazing_final.pdf