



STATE OF CONNECTICUT DEPARTMENT OF AGRICULTURE

Office of the Commissioner



Bryan P. Hurlburt
Commissioner

860-713-2501
www.CTGrown.gov

September 16, 2020

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

Re: PETITION NO. 1426 - East Windsor Solar One, 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 4.9-megawatt AC solar photovoltaic electric generating facility located west of the Ellington town boundary at 341 East Road, East Windsor, and associated electrical interconnection.

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 whether or not the project will result in a material impact to the status of prime farmland.

The project parcel (total acreage) is approximately 147.8 acres, of which the solar project footprint is planned to contain approximately 29.1 acres, 21.3 of which is mapped prime farmland. The developers (Verogy) have stated that they intend to develop this project with a co-use of rotational sheep grazing on the site.

While the plan appears mostly conceptual (see page 27 of Petition No. 1426), the developers have stated the following in their petition to the siting council:

“Lastly, in accordance with Conn. Gen. Stat. § 16-50k(a), in May of 2020, the Petitioner initiated consultation with the Connecticut Department of Agriculture (“DOA”) to present the Project and discuss the presence of Prime Farmland Soils at the Site. As a result of said consultation, the Petitioner intends to implement a grazing program for vegetation maintenance within the fenced perimeter of the Project. More specifically, a company that specializes in such services will provide the Petitioner with a flock of sheep each year (from April/May to October/November) which will be maintained on the Site under the care of a local farmer. The area proposed for such grazing activities will be seeded with low-growing grasses and forbs that are suitable for sheep as well as pollinator-friendly species. In addition, the remaining portions of the Site will be retained for agricultural uses. The Petitioner is currently awaiting a written response from the DOA regarding this proposal.”

While we would need to see more specifics regarding this proposal, on its surface, this proposal appears to follow others being put forward by Verogy. It should also be noted that, in addition to the proposed co-use, the developers have stated that the current farmer on the parcel will continue to harvest a variety of crops across about 37 acres of the parcel. These crops include but are not limited to, rye, hops, barley, pumpkin, corn, and tobacco. The existing tobacco barn will continue its use, un-interrupted by the proposed project.

As stated on previous projects incorporating this co-use approach, I want to stress to the Siting Council that there are certainly other considerations in a co-use such as this one which includes livestock. For example, developers, in partnership with the farmer(s), will need to consider how sheep will coexist with the solar panels, the site fencing, cable trays, etc. The developers will also be expected to provide the necessary infrastructure to accommodate housing, feeding, watering to support general herd management practices. Developers need to ensure there is an adequate plan for care and management of the sheep and training for anyone working at the site to ensure that both worker and animal welfare is effectively managed. It will also be necessary to ensure there is adequate signage/security in and around the site noting that live animals are grazing on the property.

Presently, the logistics and stipulations surrounding this project enable the agency to support this incorporation of agricultural co-use. Further, because successful implementation of this proposed co-use will keep production agriculture activities throughout this site, the Department of Agriculture can conclude that there does not appear to be a material impact on the status of prime farmland. The Department of Agriculture retains the ability to raise concerns and opposition in the future as detailed plans are provided by the developers.

If you have any questions, please feel free to contact either myself or Stephen Anderson of my staff. Steve can be reached at Stephen.Anderson@ct.gov or at (860) 713-2592.

Sincerely,



Bryan P. Hurlburt
Commissioner

Cc: Katie Dykes, Commissioner, Department of Energy and Environmental Protection
Lee Hoffman, Pullman & Comley LLC