



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051
Phone: (860) 827-2935 Fax: (860) 827-2950
E-Mail: siting.council@ct.gov
Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

March 9, 2021

TO: Service List, dated February 8, 2021

FROM: Melanie Bachman, Executive Director *MAB*

RE: **PETITION NO. 1442** - SR Litchfield, 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 19.8-megawatt AC solar photovoltaic electric generating facility on 6 contiguous parcels located both east and west of Wilson Road south of the intersection with Litchfield Town Farm Road in Litchfield, Connecticut, and both east and west of Rossi Road, south of the intersection with Highland Avenue in Torrington, Connecticut, and associated electrical interconnection.

Comments have been received from the Connecticut Department of Agriculture, dated March 8, 2021. A copy of the comments is attached for your review.

MB/emr

c: Council Members



STATE OF CONNECTICUT DEPARTMENT OF AGRICULTURE

Office of the Commissioner



Bryan P. Hurlburt
Commissioner

860-713-2501
www.CTGrown.gov

March 8, 2021

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

Re: PETITION NO. 1442 - SR Litchfield, 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 19.8-megawatt AC solar photovoltaic electric generating facility on 6 contiguous parcels located both east and west of Wilson Road south of the intersection with Litchfield Town Farm Road in Litchfield, Connecticut, and both east and west of Rossi Road, south of the intersection with Highland Avenue in Torrington, 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 six separate parcels, totaling approximately 212 acres in the towns of Litchfield and Torrington. The developers state that the limits of disturbance are approximately eighty (80) acres. Approximately forty (40) acres of clearing would be required, consisting of deciduous and mixed deciduous species. Of the acreage within the proposed limit of disturbance, the developers state that there are approximately 23.5 acres of prime farmland, and 27 acres of statewide important farmland soils.

Prime and Important Farmland, including their 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 may 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 projects such as this one have on farming and agriculture.

The loss of Connecticut farms significantly impacts our efforts to combat food insecurity, results in the importation of human food and animal feed from outside of our state, increases food waste, and increases the distance from which we bring in our food, thus increasing our carbon footprint. It is commonly held that well managed agricultural lands can store significant carbon and can play an important role in climate change mitigation.

In addition to taking agricultural lands out of production in the near term, this project's negative impacts will include, but not be limited to, dislocation of prime and important farmland soils, disturbances from the use of heavy equipment, holes from the installation of driven metal support posts, trenching for electrical conduit, surface grading, and the construction of access roads and equipment pads. These manipulations and changes will have an adverse impact on the upper 24 inches of the soil which are critical to plant growth, and will have negative consequences for agricultural productivity.

While the developers have proposed a "Integrated Vegetation Management Plan" which incorporates certain vegetation management objectives and Adaptive Multi-Paddock sheep grazing, 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.

Further, we continue to believe that this petition can and should give more consideration to other strategies to minimize impacts to agriculture. For example, the developer could also have considered purchase of conservation easements on farmland in the community, paying to restore farmland in the area, providing an area for new and beginning farmers to grow crops on the project site, or funds and/or acreage to support a community garden.

In conclusion, the loss of a large tract of actively used prime and important farmland soils from an agricultural community that already has a deficit of arable land will put additional farms at risk for failure and/or conversion to nonagricultural use. The Department supports properly scaled renewable energy on farms and farmland where such projects are in concert with Connecticut's farmland protection goals and policies. However, given the shortcomings in this project, in failing to give adequate consideration to the lasting effects on agriculture as noted above, the department does not support this project as proposed.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan P. Hurlburt". The signature is fluid and cursive, with the first name being the most prominent.

Bryan P. Hurlburt
Commissioner

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