



CONNECTICUT DEPARTMENT OF AGRICULTURE

450 Columbus Blvd, Suite 701 | Hartford, Connecticut 06103 | 860.713.2500

Office of the Commissioner

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May 18, 2022

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

Re: Community Power Group – 24 Middle Road, Ellington, proposed 4-Megawatt AC solar project

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, to determine whether "...such project will not materially affect the status of such land as prime farmland..."

This project will be located at 24 Middle Road, Ellington, on land owned by Phrumb Properties, Inc. The property in question consists of a single parcel which is 68 acres in size, all of which contains prime farmland soils. The solar project footprint is estimated to be 20.3 acres (approximately 30 percent of the prime farmland on the parcel). The project footprint is currently used to grow vegetable crops including corn and pumpkins. The approximately 47 acres outside of the site will continue to be farmed by the owner or leased to another farmer.

In a letter to the Department of Agriculture (DoAg), dated June 4, 2020 and follow up letters dated January 31, 2022 and May 3, 2022, the developers (Community Power Group or CPG) have agreed to implement the following agricultural practices on the site:

- 1) Master Beekeeper Mark Creighton of the Connecticut Agricultural Experiment Station will establish 10 apiaries on the site to conduct a pollinator research project. CPG will plant a pollinator friendly seed mix within the project area as well as a wildflower seed mix around the perimeter of the fenced solar array.
- 2) CPG has created a Sheep Pasture Rotation and Grazing Plan for the site. CPG will establish vegetative cover throughout the fenced project area. Species of plants will include but are not limited to Anise Hyssop, Nodding Wild Onion, Wild Columbine, Butterflyweed, Purple Prairie Clover, Blue False Indigo, Purple Coneflower, Stiff Goldenrod, Black Eyed Susan, Smooth Aster, Spiderwort, Golden Alexanders, Bergamot, Narrowleaf Mountain Mint, New England Aster, Sideoats Grama, and Little Bluestem. CPG will install three fence lines within the project area and will purchase five units of poly tape fencing to create five paddocks.

The proposed timeline provided in the plan will allow sheep on the site beginning in September 2024. The stocking rate calculation provided in the plan will allow for approximately 11 sheep to graze the property. CPG has created a Farmlink posting to

solicit interested sheep grazers. CPG will execute a grazing contract in the Summer of 2022.

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, and 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.

- 3) CPG has identified a Connecticut based vegetable grower to utilize an approximately 10,000 square foot area of land to grow crops beginning in 2024. CPG will negotiate a formal contract with this grower or another grower if necessary.

Based on statements provided in CPG's letter dated, January 21, 2022, the only significant ground disturbance caused by the project will be an access road approximately twenty feet in length extending from Middle Road south to the solar array. There will be no grading, cutting or filling, topsoil removal, or other actions associated with the project's installation and ultimate deconstruction after 20 to 30 years.

Based on preliminary information provided to DoAg (enclosed), and the successful implementation of the co-uses and continuing farming activities described above, the Department of Agriculture concludes this project will not materially affect the status of project land as prime farmland. This determination is conditioned upon the co-uses described above operating on the project site for the life of the project. The Department of Agriculture will continue to monitor the proposed project and should changes or additions to the proposal raise concerns to the Department, we reserve the right to modify our position on this project, including opposing it, as detailed plans are provided by the developers.

If you have any questions, please feel free to contact Holly Lalime of my staff. Holly can be reached at Holly.Lalime@ct.gov or at (860) 969-7053.

Sincerely,



Bryan P. Hurlburt
Commissioner

Enc.

Cc: Katie Dykes, Commissioner, Department of Energy and Environmental Protection
Jessica Anderson, Community Power Group