



## CONNECTICUT DEPARTMENT OF AGRICULTURE

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Office of the Commissioner  
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August 2, 2023

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

Re: **Updated Response Letter:** USS Somers Solar LLC – 360 Somers Road, Ellington, proposed 3-Megawatt AC solar project

Dear Executive Director Bachman:

DOAG issued a no material impact letter to the Connecticut Siting Council dated March 6, 2023 for the above referenced project. A revised project was submitted to DOAG on July 10, 2023 reducing the impact to prime farmland soils and proposing to no longer pursue rotational grazing of sheep and instead establish and maintain a pollinator habitat and apiaries within and surrounding the project footprint. This letter is in response to USS Somers Solar's revised project plans.

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 360 Somers Road in Ellington, on a portion of the larger Ellington Airport Property. The proposed solar facility will occupy approximately 19.2 acres in the northern portion of the parcel. This area is currently used predominately to grow hay and corn for a local dairy operation, including the 4.28 acres classified as containing soils of statewide importance. Prime farmland soils, which have been identified on 0.09 acres of the revised project footprint, have been previously developed as a gravel access road.

In a letter to the Department of Agriculture (DOAG), dated March 3, 2020, and a follow up letter dated October 15, 2022, the developers (USS Somers Solar LLC) agreed to design and manage the solar facility for the rotational grazing of sheep. DOAG issued a letter of no material impact dated March 6, 2023 to this effect. Currently, the developers are proposing to no longer pursue rotational grazing of sheep and instead propose to establish pollinator habitat and apiaries within and around the revised project footprint.

DOAG applauds the revised application's reduced impact to prime farmland soils. However, it is this agency's policy that pollinator habitats as a co-use should only be encouraged in instances where land has been degraded due to previous activities. Given that these classified soils are in current use as agricultural land to cultivate corn and hay, a pollinator habitat is not considered an acceptable dual use and we strongly encourage USS Somers Solar LLC to reconsider their previous commitment to livestock grazing.

DOAG would also like to express its concerns to the Connecticut Siting Council regarding enforcement of a dual-use for the duration of the project and proposes a bond to cover all costs associated with stewardship including inspections and enforcement.

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 Eileen Underwood of my staff. Eileen can be reached at [eileen.underwood@ct.gov](mailto:eileen.underwood@ct.gov) or at (860) 819-0580.

Sincerely,



Bryan P. Hurlburt  
Commissioner

Enc.

Cc: Katie Dykes, Commissioner, Department of Energy and Environmental Protection  
Peter Schmitt, USS Somers Solar LLC