



CONNECTICUT DEPARTMENT OF AGRICULTURE

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Office of the Commissioner

Affirmative Action/Equal Employment Opportunity Employer



October 3, 2023

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

Re: Greenskies Clean Energy, LLC – Spencer Hill Road, Winchester, proposed 3.7-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 on Spencer Hill Road in Winchester, on land owned by Frank Ahern and Karen Merete. The entire 190.38-acre parcel contains approximately 21.5 acres of prime farmland soils and 13 acres of statewide important farmland soils. The proposed solar facility will occupy approximately 13 acres, all of which are classified as prime farmland soils. The project area is currently leased to a tenant farmer who grows hay to feed an offsite herd of beef cattle. The project area has been used as a hay field since 1993.

In a letter to the Department of Agriculture (DOAG), dated August 14, 2023, and follow up information contained in an email dated September 13, 2023, the developers (Greenskies Clean Energy, LLC) have submitted a revised proposal stating that they intend to develop this project with co-uses which include commercial herb farming, pollinator-friendly ground cover, and beekeeping on approximately 12 acres. Greenskies also plans to partner with the Connecticut Agricultural Experiment Station to conduct research on the production of crops under photovoltaic panels on the remaining one acre. A letter of intent has been provided by Leigh Whittinghill which details plans to perform crop trials and soil testing, with the stipulation that this project is dependent upon securement of funding.

Based on preliminary information provided to DOAG (enclosed), and the successful implementation of the co-uses 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:

1. Execution of the aforementioned field research project.
  - a. A minimum of one (1) acre within the Generation Footprint must be used for Agrivoltaics research for the lifetime of the project
2. The dual-uses described above operating on the project site for the life of the project, including:
  - a. Production agriculture of row crops (herbs) by a commercial farmer(s) on a minimum of ten (10) acres within the Generation Footprint
  - b. Harvesting of honey by a commercial farmer

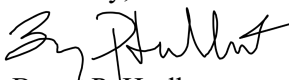
- c. Overseeding as needed to maintain sufficient land coverage of plants
  - d. Beekeeper and crop farmer shall have 24/7 access to the site
3. Planting and maintenance of pollinator habitat between the perimeter fence and the limits of the agricultural dual-use.
  - a. Although pollinator habitats are not in and of themselves considered a dual use, DOAG recommends that native pollinator plant species be established between the perimeter fence and the limits of the solar array. If solar grazing is selected in whole or part as an agricultural dual use, then a species-specific pollinator friendly forage mix with nutritional health considerations should be selected as ground cover.
4. Maintenance of the project area, including:
  - a. Proper soil preparation must take place including preliminary soil testing, followed by repeated testing every 2-3 years and the incorporation of soil amendments as needed
  - b. Removal of invasive plants as needed
  - c. No debris from construction shall be left in the array
  - d. That 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
  - e. Any fill imported onto the parcel must be selected by a soil scientist as appropriate for the selected agricultural use
5. The height and spacing of panels must accommodate crop-specific needs for sunlight, farm machinery, and worker accessibility.
  - a. Row spacing of 19.5 feet, as proposed by Greenskies, must not be diminished
6. The solar developer 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 advanced notice of site visits.
7. The solar developer shall allow a representative of the Commissioner of Agriculture to conduct a site visit on an as needed basis to confirm compliance with planned activity on the site.

The Department of Agriculture 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  
Bonnie Potocki, Project Developer, Greenskies