

**PA 490 Working Group Meeting**

**Tuesday, May 12, 2026**

**9:30 AM - 11:30 AM**

**450 Columbus Boulevard  
Plaza North Hearing Room C, Hartford**

**Public Participation via [Registration](#)**

**AGENDA**

Call to Order            OPM Undersecretary Martin L. Heft  
                                 DoAg Commissioner Bryan Hurlburt

**Business**

- Methodology Considerations
  - Land Classification
  - Reporting
  - Valuation
  - Other
- Next meeting - TBD June
  - Continued review of Methodology Considerations
  - Outreach and Engagement Improvements

Comments received via e-mail

Public comment - Remote via [registration](#)

Public participation is available via Teams and will be limited to three (3) minutes per person. Please identify yourself and make your statement. Note this portion is not a question-and-answer session.

Adjournment

## **PA 490 WORKGROUP MEETING NOTES**

**April 14, 2026**

The meeting was called to order by Office of Policy and Management (OPM) Undersecretary Martin Heft at 9:33 AM at 450 Columbus Boulevard, Hartford.

### Working Group Attendance:

Undersecretary Martin Heft, Commissioner Bryan Hurlburt (Department of Agriculture DoAg), Christopher Martin, David Beers, Paul Larson, Damon Braasch, Nicholas D'Addario, Mark Walter, John Emmanuel, Keith Bishop, Francis Whelan, John Hall, Ben Freund, Joseph Orefice, Mike Gilman, Bonnie Burr, John Casertano, Ella Kennen, and Jennie Kapszukiewicz

### Guests (online):

Howard Rosenthal, Representative Doug Dubitsky, Jerry Grabarek, Shannon Chatfield, and Representative Steve Weir

### State Agency Staff:

Kayleigh Royston (DoAg), Rebecca Eddy (DoAg) and Nathan Wilson (DoAg)

Undersecretary Heft provided opening remarks noting that today's meeting will focus on other methodology considerations. He noted we have a clean slate for recommendations, and this is the start of the process, and we will go back through the comments submitted previously. He added that we will have some extra time today as no public has signed up to comment and that this conversation will roll over into the next meeting.

Commissioner Hurlburt hoped members found time to review materials in advance and started thinking about how we can put together a program that's going to be more reflective of the values and a process that ensures the confidence of the public throughout the course of these recommended land values.

## **BUSINESS**

Undersecretary Heft remarked that members asked for additional methodologies at the last meeting. He thanks Mr. Braasch for researching Pennsylvania and providing documents as well as Mr. Bishop of the report "Northeast US Farmland Current Use Valuation Methods." He added that we would not do a full review, as Mr. Bishop has a presentation which includes aspects of the report as well as his methodology recommendation suggestions.

Ms. Kennen inquired if it was better to establish evaluation criteria first rather than reviewing methodologies. Undersecretary Heft stated we would have the presentation first, as there will be plenty of time to discuss. He added that they both go hand in hand, and no right order of which to do first.

Undersecretary Heft called on Mr. Bishop to provide his presentation "Straw-Man Proposals and Presentation to the PA 490 Working Group". The presentation is attached to the notes.

#### Proposal A – The PPI Index Plan

- Mr. Braasch noted there is a leveling process in change of assessment. A counteraction happens with mill rate along with assessment change. Revaluation increases values, and lowers mill rates.
- Ms. Kennen stated that we can look at each methodology separately, not just in a bundle.
- Mr. Freund would like to have noted which is allowable under current legislation versus needing legislative change.
- Commissioner Hurlburt reminded us that the statutory goal is to preserve the land and legislation is silent on methodology. State agencies do not have staff or expertise to run calculations; thus, they need to hire consultants or outside resources.
- Mr. Orefice stated the need to decide on categories, base line prices, adjustments to base lines, options for additional use reductions.
- Mr. Braasch inquired if other considerations will be presented. Undersecretary Heft noted there will be time after the presentation.

#### Proposal B – Rewards for Results

- Mr. Orefice noted issues if you lease your land as an LLC that this could be an issue.
- Mr. Freund feels this is too complex and beyond the scope.
- Ms. Burr noted ecosystems and environmental services that agriculture provides.
- Mr. Orefice liked the idea of incentivizing.
- Commissioner Hurlburt noted that the Governor has expressed interest that if you have a permanent conservation easement, such as development rights through state agencies, there should be a tier that protects your property taxes.

#### Proposal C – The Farmer-First Contract

- Ms. Kennen noted that land can be productive without being economically viable. We need to think about who we are leaving out when we tie active production to income.

- Mr. Emmanuel inquired if it may adversely impact people that have 80 acres of open space that can't productively use it or get a farmer to productively use. If a developer purchase land at extreme value, there is no incentive to preserve it.
- Mr. Larson commented that to test the production value for the whole farm, the number should be tied to quality of land.
- Mr. Orefice noted was noted there is a current \$2,500 income threshold and PA 490 threshold is different than tax threshold.
- Commissioner Hurlburt noted there is discretion on how assessor qualifies the land and the definition of farmer would benefit from this. It would need legislation clarity.
- Mr. Orefice liked the idea of giving PA 490 some teeth when use change.
- Mr. Braasch noted that regarding penalties, currently a ten-year period from date of application/ purchase is in statute. It starts at 10% in the first year, 9% second year and goes down to zero for change of use/ownership. Conservation easements, value should be reduced as development rights limit use. Idea to have easement classified as farmland.
- Mr. Gilman inquired if solar energy is added, does this change the use? Mr. Braasch responded technically it is an active use/utility production.
- Mr. Freund commented that we need to stay in our bucket in overall review. PA 490 has worked well, and needs to keep simple approach
- Ms. Kapszukiewicz agreed that we need to stay focused on our task.
- Mr. Larson discussed the declassification and future ownership, as well as penalizing landowners.
- Mr. Braasch provided an East Haddam example regarding zoning and open space, that preserves the land for a longer period by slowing the process down.
- Mr. Beers agreed to stay away from looking at penalties.

#### Proposal D – The Strategic Toolkit

- There were no comments on this section.

Undersecretary Heft thanked Mr. Bishop for the presentation and the ideas. He noted that we will begin looking at individual recommendations and asked members to submit their suggestions for the next meeting. A list will be compiled and sorted by areas (i.e. criteria, categories, incentives).

Ms. Keenen wants to make sure we are clear on the criteria, and judging things based on some sort of criteria. She reviewed some key captured thoughts from the presentation and her thoughts on categories.

Mr. Braasch noted some of the points in the presentation. A required lease provides vitality and information needed. Indexing could work, but income thresholds have not been updated. He asked about thoughts on the solar use of farmland.

Mr. Orefice commented on solar use of farmland and what he has seen in other states. Need to establish what categories, base line and incentives. One of the categories we don't have is "farmyard". Mr. Braasch added that an assessor will value the entire lot, and some will include a building lot value for farm buildings.

Mr. Larson has seen solar proposals and noted that the income from that is not farming – not producing food but some ecosystem services.

Mr. Orefice would push back as it is a competing business.

Mr. Braasch added that farms being used as "venues". Utilizing a commercial application on farm land for events (agritourism).

Mr. Braasch presented recommendations of enhanced data collection and valuation methodologies. The presentation included a state-by-state comparison of process. A copy of his notes are attached.

- Ms. Kennen commented on rental rates versus income. Would income be a better baseline as aggregate vs individual. Mr. Braasch noted assessment is on "highest and best use" assessed at highest value as most productive.
- Mr. Freund stated this should be a required self-reporting process with minimal categories, rental rates. Only issue is the reporting problems, not current methodology.
- Mr. Casertano agreed that PA 490 is a privilege and way to connect current reporting systems to collect needed information. Concerns on penalizing concept. The data is available already, just need to obtain.
- Ms. Kennen inquired on how to get lease data from farmers. Mr. Freund noted that landowner files PA 490 and needs to report. Undersecretary Heft noted that PA 490 is attached to the landowner, not the lessee. We collect rental rates mostly from the farmers rather than the landowner.
- Mr. Braasch emphasized the need to have a copy of the lease agreement filed to establish formal structure.
- Ms. Kapszukiewicz noted that handshake agreements are allowed, so no paperwork.

- Ms. Burr commented on not having buyers and is challenged by the income approach. Rental rates based on who has most money. How to value our own farm land, and what is an appropriate rental rate.
- Mr. Gilman noted that the income base will be impacted by weather conditions and other variables. Don't want the farmer to have to decide to grow less to be taxed less.
- Ms. Burr inquired about the assessor's standpoint on maritime heritage land. Mr. Braasch noted that underwater farming (right to harvest), has lease agreements in place with state. There has not been direction on this category in the past and no sales for comparison. Undersecretary Heft added that the 2025 values did include Maritime Heritage for the first time and was based on the lease agreements.
- Mr. Bishop remarked about the income approach and certain criteria and incentives.
- Mr. Hall agreed that the financial information is a slippery slope. Categories should be based on soil types and establish a baseline.
- Mr. Orefice stated that we could discuss flat rate approach.

The next meeting is scheduled for Tuesday, May 12<sup>th</sup>. Undersecretary Heft asked members to submit their recommendations to [OPM.PA490@ct.gov](mailto:OPM.PA490@ct.gov) by May 5<sup>th</sup> so a listing can be provided in advance of the meeting. We will push the Outreach and Engagement Improvements and Taxation of PA 490 Lands to a future meeting.

Public Comment – Representative Doug Dubitski inquired how to submit comments. Undersecretary Heft provided the [OPM.PA490@ct.gov](mailto:OPM.PA490@ct.gov) email.

The meeting was adjourned at 11:39 AM.

PA490 Work Group Recommendation Review List

CATEGORY	RECOMMENDATION	SOURCE	DATE	NOTE
Land	Reduce the overall number of land categories to streamline the program	Duncan Wilbur	2/18/2026	public comment
Land	Remove River Valley classification and treat all land statewide the same	Mike Cannata	2/20/2026	public comment
Land	Simplify land classifications	Ben Freund	5/3/2026	member
Land	Simplify land classifications via a tiered approach	Kim Grijalva	5/5/2026	member
Land	Determine categories (see tab)	Joe Orefice	4/14/2026	member
Land	Reduce to five-class model from eight	Keith Bishop	4/14/2026	member
Reporting	Utilize DRS sales and use tax exemption (Form REG-8/Form OR-248) and require mandatory reporting of PA 490 acreage	Duncan Wilbur	2/22/2026	public comment
Reporting	Utilize Form M-29 (farmland) to close the circle and require all lease and rental agreements	Duncan Wilbur	2/22/2026	public comment
Reporting	Mandatory annual reporting of rental rates on M-28 form	Keith Bishop	4/14/2026	member
Reporting	Require the rental information at the time of PA 490 application. Provides 100% compliance on a rolling bases as applications or made or renewed.	Ben Freund	5/3/2026	member
Reporting	Annual Farm Reporting and Central Database	Kim Grijalva	5/5/2026	member
Valuation	Arrive at land values that are more reflective of true operating costs	Duncan Wilbur	2/18/2026	public comment
Valuation	Flat rate in lieu of property tax	Bruce Wheeler	2/18/2026	public comment
Valuation	Create a mill rate cap system	Duncan Wilbur	2/20/2026	public comment
Valuation	Values out of sync with actual profit in growing crops	Jerry Grabarek	2/24/2026	public comment
Valuation	Value at an income-capitalization of net farm income	Damon Braasch	4/14/2026	member
Valuation	Use five-year average while throwing out highest and lowest years	Keith Bishop	4/14/2026	member
Valuation	Statewide mill rate for PA 490 farmland	Kim Grijalva	5/5/2026	member
Valuation	Determine valuation method (see tab)	Joe Orefice	4/14/2026	member
Valuation	Utilize Produce Price Index (PPI) over five years instead of rental surveys	Keith Bishop	4/14/2026	member
Valuation	Growth Cap at 2.6% per year	Keith Bishop	4/14/2026	member

PA490 Work Group Recommendation Review List

CATEGORY	RECOMMENDATION	SOURCE	DATE	NOTE
Valuation	Change to incentive model - move from soil to rewarding actual farm work	Keith Bishop	4/14/2026	member
Valuation	Flat statewide rate - \$1,000 per acre / \$50 per acre non-productive	Keith Bishop	4/14/2026	member
Valuation	Credits for Production - "productive credit" and "stability credit"	Keith Bishop	4/14/2026	member
Valuation	\$100 per acre assessment / \$50 per acre non-productive land assessment and meet active production threshold	Keith Bishop	4/14/2026	member
Valuation	Tie to Agriculture Income (i.e.: REG-8, M-28)	Keith Bishop	4/14/2026	member
Valuation	Size-Based tiering (blocks of 100+ acres)	Keith Bishop	4/14/2026	member
Other	Add additional incentive reductions (see tab)	Joe Orefice	4/14/2026	member
Other	Conservation penalty - five year and ten year approaches	Keith Bishop	4/14/2026	member
Other	Scaling penalties - percentage based on how much land removed	Keith Bishop	4/14/2026	member
Other	50% tax reduction for land with a permanent easement (PDR land)	Keith Bishop	4/14/2026	member
Other	Regional Agricultural Commissioner Body	Kim Grijalva	5/5/2026	member
Other	Suggested sliding scale of additional land tax deductions for participating farms	Kim Grijalva	5/5/2026	member
Other	Limiting Assessor Jurisdiction	Kim Grijalva	5/5/2026	member
Other	Protecting Farmland from conversion (penalty)	Kim Grijalva	5/5/2026	member

**Draft To-Do Item Notes for PA490 Working Group  
Joe Orefice - April 14, 2026**

Note – Consider Evaluation Criteria – See Kenna’s document

**Step 1: Determine Categories**

- Farmland\*
  - Prime Farmland\*\*
  - Farmland of Statewide Importance\*\*
  - Actively farmed but not Prime Farmland nor Farmland of Statewide Importance\*\*
  - Farm Yard (land which supports farm buildings)
  - *\*must meet farm income hurdle to qualify, perhaps match with State Sales tax exemption – and that can be evidence that is provided to assessor OR provide a copy of a lease of the land to an entity that meets farm income*
  - *\*\*Obtained from the Websoilsurvey and town GIS maps*
- Swamp/ledge
  - 1 acre minimum
- Forestland
  - Add that value must stay lower than the lowest Farmland value
- Maritime
- Open Space (must be greater than farmland)
  - Include horse boarding paddocks?

**Step 2: Determine Valuation Method**

- Farm income method tiered by soil quality?
- Or a blending of commodity prices for common crops?
- Set a flat rate for farmland and tier it down based on soil quality?
  - Perhaps the rate is reviewed every 5 or 10 years by a Gov appointed panel of famers?
  - Flat rate could be reduced for incentives (below)
- Keep Forestland in the process that is used now, but make that process public and documented
  - Perhaps also factor in logging rates and mill paid prices on the landing? This could be done with a survey of loggers and log buyers in the state. It would be a good data set to have for our forest economy plus a good use of the existing funds that were used to survey farmland rentals (redirect to CT DEEP Forestry)
- Set a flat rate for Swamp/Ledge category at \$1
- Maritime?
- Open Space value would still be set by each town but must be higher than the highest farmland category.
  - Let towns decide to allow horse boarding to go into open space or not?

**Step 3: Determine if we want to add additional incentive reductions, which could be % reductions within the Farmland Categories**

- These do not stack, instead the best qualified incentive is applied
- Ex:
  - Ecosystem services for perennial cropping/grazing
  - Property size reductions
  - Conservation easement incentive
- Greater reduction for agreeing to keep land in current use for at least 10 years after taking the last reduced tax benefit (similar to NY’s program penalty)
- For example: a grazing land or conservation easement incentive could reduce a flat rate of \$1200/ac on “Prime Farmland” by 80%

To: Office of Policy and Management, State of Connecticut

Re: **Working Group Recommendations for PA 490 Reform**

May 5, 2026

## Introduction

PA 490 was written with a clear and correct principle at its core: **farmland should be assessed based on its use, not its speculative market value**. My recommendations reflect my own core beliefs in how this system should function and support farm viability in this state as well as the collective feedback from many farmers I have been in discussion with in and outside of the Working Group. These recommendations are not a radical rewrite. They are a restoration of that original intent, paired with a data infrastructure and accountability structure that makes the system self-correcting and resistant to the kind of appraisal malfunction that brought us to this moment.

## A Brief Recap of What We've Learned

Every five years, the Department of Agriculture surveys farms to determine lease rates, which then inform farmland assessments. Last year's survey concluded that fewer farms were leasing land — likely due to farm sales, rising land values driven by investor interest, and conversion to non-farm uses, and may have included two top trending developments: solar development (avg \$800–\$2,500 per acre/year), event venues and the like. The paid lease data we obtained through a FOIA request indicated parcel size and pricing, with limited categorical breakdown of use. The pricing **did not reflect rates farmers recognize** as consistent with agricultural leasing for the specified use; i.e., \$39,996 for 99 acres to grow hay on 69 acres of available Pasture F. The avg rate for hay pasture, which would need to have some tillable value not rocky terrain, would be about \$80 per acre or barter. So this lease raised a red flag for us.

Farm Credit East then conducted an appraisal and presented findings to the Working Group in person and a public Zoom meeting. It became clear they relied on escalated lease values that may have included some of the mentioned non-farming leases, and farm resales, and may not have adequately reflected leased land for farming. All \$0 lease rates and barter were thrown out. Decisions that determine whether a farm survives were made on data that could not be verified, scrutinized, or separated from non-farm activities and an appraiser who did not seem to understand or support the core values of PA 490.

The result was that farmland assessments were driven upward by values that have nothing to do with farming, leaving farmers exposed.

## Core Principle: Assessment Based on Use

All recommendations that follow flow from one principle. **Farmland in PA 490 must be assessed based on the cost and activity of farming that land**, not on what the land could fetch if sold to a developer, leased to a solar company, or converted to an event venue. The final assessment, conducted and approved by the Commissioner of DoAg prior to submitting to OPM must understand the real pressure points of farming and current farm economics at the time of the assessment. The goal of this recommendation is to build a system that does this structurally, regardless of who is sitting in that seat.

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## Land Categories and Tax Rates

As a group, we recommend retaining the land categories but simplifying them, and significantly reducing farmland tax rates across the board.

Farms carrying real operational overhead are absorbing substantial risk and costs to produce at nearly nonexistent margins. That contribution deserves recognition in the tax structure.

We recommend modeling a tiered approach as seen in other states:

**Preserved working farms** that are actively producing, not a token harvest but genuine, ongoing agricultural production of food, feed, or fiber — should be fully exempt from land taxes. Preservation was a public investment in keeping that land in farming. Taxing it back toward unviability defeats the purpose of that investment. **Governor Lamont has voiced he supports this position on several public occasions.**

**Active food-producing farms** at high production levels should be exempt from land taxes, consistent with the model **Vermont** has established for its highest-producing agricultural operations. The details of production thresholds can be developed in subsequent rulemaking, but the principle should be established now.

**All other PA 490 farms** should see a significant across-the-board reduction in land tax rates, reflecting the baseline public benefit of keeping land in agricultural use. As an example we asked farmers simply what they could afford; 10% indicated \$140 to \$240 an acre was a fair assessment, and 85% indicated 43% \$30-\$60 per acre to preserve working farms, and 45% indicated \$0 for high production, preserved working farms. This is based on factoring in today's costs of production.

**Managed forestland** where the landowner is actively removing invasives, harvesting standing dead timber, or otherwise managing the land, should receive a favorable rate reflecting that stewardship. Forestland used primarily as a private recreational and reserve, tucking estate money away, with no active management, should not receive the same benefit as working forestland.

## A Statewide Mill Rate

Several recommended establishing a **statewide mill rate for PA 490 farmland**, set every five years and applied equally to all qualifying farms across Connecticut. That rate should be anchored to the lowest mill rate on the grand list for that term.

This does two things. First, it creates **predictability**. Second, it removes the current situation where a farm's tax burden is subject to local assessor interpretation and town-by-town variation. The rate reflects farm use conditions statewide, not local real estate dynamics.

Critically, this rate is not assumed to increase over time. Because it is based on use and viability, it may go down in periods of agricultural stress. That is not a flaw. That is the system working correctly.

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## A Regional Agricultural Commissioner Body

We recommend replacing the current single-point assessment authority with a regional body of commissioners who convene bi-annually to discuss the state of ag in the state, and every five years to review farm viability across the state. This body should include farmers and agricultural professionals with direct knowledge of operating costs, market conditions, and regional variation. Their final review ladders up to the Commissioner of Agriculture and is weighted in the final assessment process.

The five-year review should be informed by real farm data — not periodic surveys of lease rates that can be skewed by non-farm activity. That brings us to the data infrastructure this system needs.

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## Annual Farm Reporting and a Central Database

We recommend establishing a mandatory annual farm reporting requirement for all PA 490 farms. Every farm in the program must submit an annual report. **Farms may submit anonymously** and still maintain their PA 490 status and **receive the base land rates established by the statewide mill rate**. However, farms that want to access additional deductions must provide **proof of farming through K-1** documentation tied to their Profit and Loss statement.

Farmers can submit their annual report in one of two ways: directly through an online portal, or in person at their town office, where staff can assist with data entry and upload. The system should accommodate both because not all farmers have reliable internet access or comfort with online platforms.

The **Department of Agriculture will maintain this database**. Individual farm data will be private and not subject to public FOIA disclosure. Regional commissioners will have access to the data in aggregate and at the farm level for purposes of their five-year review. No other body will have access to individual farm records.

The content of the annual report will be determined in subsequent rulemaking, but should include, at a minimum, farm acreage and categories, primary products, key input costs including utilities, feed, hay, seed, fertilizer, processing fees, and labor, and gross revenue ranges. This data gives us something we have never had: a real, farmer-reported, annually updated picture of what it actually costs to farm in Connecticut and what we produce. How farms have declined or how they've grown. It will inform the five-year mill rate review, identify pressure points before they become crises, and support planning for state farm infrastructure investment and budgeting.

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### **Suggested Sliding Scale Deductions for Participating Farms**

Farms that choose to participate fully, submitting their annual report with K-1 documentation, will be eligible for a sliding scale of additional land tax deductions based on the ratio of input costs to revenue. Farms operating at high input-to-revenue ratios, meaning farms under the most financial pressure, will receive the greatest relief. **Participation is voluntary**. Farms that do not participate **will still maintain their PA 490 status and pay the base statewide mill rate**. They simply will not access the additional deductions available to farms that provide documentation.

The exact structure of the sliding scale will be developed in subsequent rulemaking. What we are establishing here is the principle: farms that open their books and demonstrate genuine agricultural production under economic stress should be supported with meaningful tax relief.

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### **Limiting Assessor Jurisdiction**

We recommend strengthening PA 490 by addressing the inconsistent and often subjective application by local assessors, which has created uncertainty for working farms. Variability in interpretation—whether due to lack of familiarity with agricultural operations, differing local priorities, or revenue pressures—undermines the program's intent. Once a farm demonstrates that it meets the established parameters for agricultural use, and that determination is supported by guidance or documentation from the Connecticut Department of Agriculture, that status should carry significant weight and not be easily overturned. Clear guardrails are needed to ensure that such determinations cannot be dismissed without substantial, evidence-based justification and that farmers are not forced into costly disputes to maintain eligibility.

## **Protecting Farmland from Conversion**

When farmland is removed from PA 490 for commercial development, the clawback penalty should be significantly more than what it would be for residential conversion. The current incentive structure makes it too easy and too profitable to flip a farm into a solar field or a subdivision. A significantly higher commercial clawback changes that calculus.

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## **A Self-Correcting System**

Taken together, these recommendations form a coherent and connected system. The annual reporting database feeds real data into the five-year review. The regional commissioner body uses that data to set a recommended assessed per acre, per category assessed ag values. The statewide mill rate removes local assessor interference from the equation. The sliding scale deductions support farmers bearing the costs of farming. The clawback and ineligibility provisions protect the program from being gamed by non-agricultural interests.

No single piece of this works as well without the others. That is by design. We are not patching a broken system. We are building the infrastructure that the original law assumed would exist but never specified.

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## **Conclusion**

Connecticut farmers are not asking for a handout. We are asking for a tax structure that reflects what farming actually costs, what it actually earns, and what it actually contributes to this state. We are asking for data systems that tell the truth about farm viability. We are asking for oversight that is insulated from financial conflicts of interest. And we are asking for protections that ensure the program serves farmers, not investors, developers, or institutions with a stake in driving land values up.

There would be many details to finalize with this plan and legislative action to enhance the existing law. But the framework is clear, and we are confident it reflects both the letter and the spirit of what PA 490 was always meant to do.



Kim Grijalva

On Tue, Apr 14, 2026 at 1:26 PM Duncan Wilber <[wilberfarm06021@yahoo.com](mailto:wilberfarm06021@yahoo.com)> wrote:  
Keith

I just finished reading your presentation to the 490 Group and have some suggestions to consider based on my own experiences.

On page 22, "Rental Stability Clause", I would consider changing the years to 5 for the simple reason of ROI associated with organic farming. There is a 3 year look back for certification and 3 years would be a break even in terms of "sellable organic" label.

On page 28, "Right of first refusal" I caution the suggest move of land ownership to "Land Trust" or "Municipalities". I understand it works in some parts but in my area, farmland that transfers to those entities become "bird nesting" and are removed from the tax roll, further increasing a tax burden on the most vulnerable. If a PILOT program was mandatory, then I could get behind it.

On page 29, "Fund local Town Land Preservation fund", again, where I'm from this does not exist, nor do I believe there will be enough transfers or penalties to support such an account to be able to use. I could see it as money sitting with limited use for a municipality., Maybe some other place where the money could be used.

I like the presentation as we share many similar ideas. I always look at how each recommendation can be exploited though as I may be too cynical by nature. Incentivized use is a must for most of us, especially if renting and fallow land is an issue for the municipalities, given the "language" of the current statue, but I do caution the possible slippery slope with changing that.

Feel free to reach if you want, best to call 860 379-2580, but emails are fine

Duncan Wilber