



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

July 18, 2017

TO: Parties and Intervenors

FROM: Melanie Bachman, Executive Director *MB*

RE: **PETITION NO. 1310** - Quinebaug Solar, LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 50 megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury, Connecticut and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut.

Comments have been received from the State of Connecticut Department of Agriculture on July 17, 2017. A copy of the comments is attached for your review.

MB/MP/lm

c: Council Members

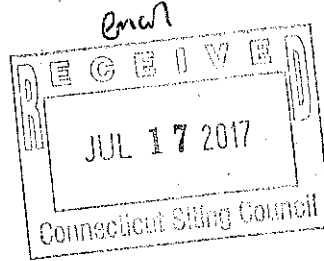


STATE OF CONNECTICUT
DEPARTMENT OF AGRICULTURE
 Office of the Commissioner



Steven K. Reviczky
 Commissioner

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

Re: Petition No. 1310 - Quinebaug Solar, LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 50 megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut.

Dear Executive Director Bachman:

This project seeks to convert approximately 275 acres of Prime and Important Farmland Soils to a 50 megawatt solar voltaic development.

Prime and Important Farmland 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, agriculture and associated natural resources.

With considerable competition already present for available agricultural land in Connecticut, the loss of this highly productive farmland will only exacerbate farmers' challenges in finding quality land to farm. This project has already caused the conversion of cropland from forest land in the area, the farming of more environmentally sensitive soils, and increased competition and speculation for farmland leases resulting in a lack of land access for beginning farmers.

In general, 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.

From a public policy standpoint, this project's conversion of significant agricultural land resources in two communities, Canterbury and Brooklyn, is incompatible with the goals of the State of Connecticut to keep agriculture viable and growing, to permanently protect farmland from conversion through the purchase of agricultural easements and/or development rights, improve land use planning, and increase agriculturally based economic development and investment through grants and programs.

Prime and important farmland soils are a finite resource. In addition to taking agricultural lands out of production in the near term, the development of large solar facilities such as this one, and associated construction techniques and placement of other infrastructure will damage soil resources and have long term impacts on the potential for future agricultural productivity. The petition's assertion that the proposed large solar array is a better land use than the alternative of other development is not true. For example, a clustered development (with roof top solar) on a portion of the property, with the remaining farmland, forest land, and wetlands protected with a conservation easement, might be a more preferable alternative.

As with other projects, the applicant's consultant, Tighe and Bond, minimizes the impacts of the installation of the solar array and its infrastructure on the soil resource. The soils information provided in the petition and the associated "Soils Mitigation Plan," which relies primarily on stockpiling the topsoil from disturbed areas of prime and important farmland soils, includes several deficiencies, including the following:

1. *The petition incorrectly states that the soil health would be better protected by being in a solar array, and assumes that the current agriculture and management would remain unchanged.* Agriculture in Connecticut is very diversified, and changing. We can envision many agricultural activities that would provide substantially better soil health and ecosystem benefits over the proposed solar array which will result in disturbed soils covered with a monoculture of semi-managed grasses;
2. *The petition fails to provide the necessary information for minimizing soil impacts during construction, or the necessary soil baseline information to develop a restoration plan should the site ever be decommissioned, and no real assurances are given that the stockpiled material from excavated prime and important farmland soils will even remain on site.* Baseline soil testing should include: nutrients, bulk density, and transects of soil profile information, and possible high intensity soil survey. This is necessary to provide guidance during construction and for reclamation should the site be decommissioned;
3. *The impacts from the use of heavy equipment, the holes from the installation of driven metal support posts, miles of trenching for electrical conduit, surface grading, and the construction of access roads and equipment pads were not fully explored.* These manipulations and changes will most certainly have an adverse impact on the upper 24 inches of the soil which are critical to plant growth. The inversion of soil horizons, compaction, destruction of soil structure, acidification and loss of fertility, and changes to surface and subsurface soil hydrology are likely, with negative consequences for agricultural productivity.

It is also disappointing that, although there is a reference in the document to a meeting and site visit with Connecticut Department of Agriculture staff, few of our recommendations were utilized. For example, opportunities to continue agricultural use could include phasing of the project to allow some fields to be used until area farmers can secure other lands or including additional infrastructure to allow sheep grazing.

Or, as part of the applicant's mitigation plan, consideration could have been given to the purchase of conservation easements on farmland in the community, paying to restore farmland in the area or utilizing additional mined land on the parcel for solar arrays and then leasing out the farmland acreage.

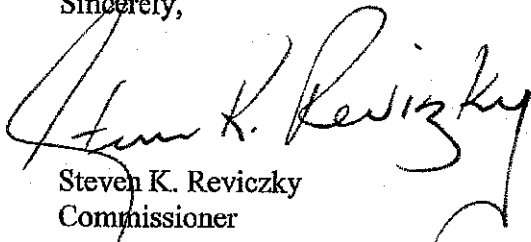
In conclusion, the loss of hundreds of acres of actively used prime and important farmland soils from an agricultural community that has a deficit of arable land will put additional farms at risk for failure and conversion to nonagricultural use, including development. Should the project at some future time be decommissioned and leave the property, the soil productivity will have been compromised and require restoration with unknown productivity for future farmers.

While the Department of Agriculture supports properly scaled renewable energy on farms and farmland where such projects are in concert with Connecticut's farmland protection goals and policies, we do not support this project. In our opinion, there is a substantial environmental impact and we would not support issuance of a Certificate of Environmental Compatibility since it is counter to the State's goals of farmland protection and the promotion of agricultural economic development both of which, like renewable energy, are components of sustainability and climate change adaptation and mitigation.

Energy companies, policy makers and decision makers should be mindful that there are substantial highway right of ways, brownfield sites, developed sites and gravel mines in the Quinebaug Valley that are much better suited to solar development than the conversion of finite farmland soil resources which provide significant ecosystem goods and services.

Thank you for the opportunity to comment on this project. If you have any questions, please contact me.

Sincerely,



Steven K. Reviczky
Commissioner

cc: Commissioner Klee
Department of Energy and Environmental Protection