



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

www.ct.gov/csc

VIA ELECTRONIC MAIL

January 13, 2020

TO: Parties and Intervenors

FROM: Melanie Bachman, Executive Director *MAB*

RE: **PETITION NO. 1310A** - Quinebaug Solar, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, 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. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b).

Comments have been received from the Connecticut Department of Agriculture, dated January 9, 2020. 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

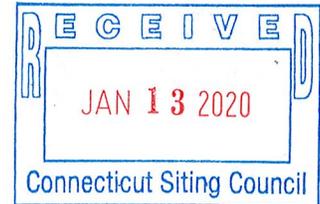


Bryan P. Hurlburt
Commissioner

860-713-2501
www.CTGrown.gov

January 9, 2020

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



Re: Petition No. 1310A - 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. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b).

Dear Executive Director Bachman:

While the Department of Agriculture has already provided comments on the original Petition for Declaratory Ruling in this matter (Petition No. 1310), we wanted to reiterate our concerns with this project. Our primary concern is that the project, although the impact has been somewhat reduced, still seeks to convert approximately 190 acres of Prime and Important Farmland Soils to a 50 megawatt solar voltaic development.

As stated in our previous comments, 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 and agriculture.

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.

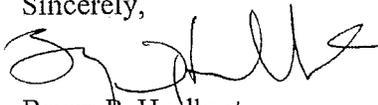
In addition to taking agricultural lands out of production in the near term, this project's impacts will include but not be limited to those from the use of heavy equipment, holes from the installation of driven metal support posts, miles of trenching for electrical conduit, surface grading, and the construction of access roads and equipment pads. These manipulations and changes will have an adverse impact on the upper 24 inches of the soil which are critical to plant growth, and will have negative consequences for agricultural productivity.

We continue to believe the petition could have given more consideration to mitigation. For example, the developers could consider 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 large tracts 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/or conversion to nonagricultural use. While the Department 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan P. Hunburt". The signature is fluid and cursive, with a prominent initial "B" and a long, sweeping underline.

Bryan P. Hunburt
Commissioner

Cc: Katie Dykes, Commissioner
Department of Energy and Environmental Protection