



STATE OF CONNECTICUT
DEPARTMENT OF AGRICULTURE
Office of the Commissioner



Bryan P. Hurlburt
Commissioner

860-713-2501
www.CTGrown.gov

August 15, 2019

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

**Re: Greenskies Renewable Energy LLC (“Greenskies”)
Proposed Solar Photovoltaic Development
35 Taugwonk Spur Road, Stonington, CT**

Dear Ms. Bachman,

Greenskies Renewable Energy, LLC has contacted the Connecticut Department of Agriculture (“Department”) and informed us of their imminent filing of a petition for a declaratory ruling with the Connecticut Siting Council (“Council”). Greenskies proposes to construct a solar photovoltaic facility with a capacity of 5.0 megawatts, to be located at 35 Taugwonk Spur Road, Stonington, CT.

Section 16-50k(a) of the Connecticut General Statutes requires that for a solar photovoltaic facility with a capacity of two or more megawatts, to be located on prime farmland, “excluding any such facility that was selected by the Department of Energy and Environmental Protection in any solicitation issued prior to July 1, 2017, pursuant to section 16a-3f, 16a-3g or 16a-3j”, the Department of Agriculture must represent, in writing, to the Connecticut Siting Council (CSC) that such project will not materially affect the status of such land as prime farmland.

Approximately 16 acres of prime farmland would be impacted by the installation of the solar panels, racking systems, equipment pads, access road, and the associated site work involved with this project. Our Department has reviewed documents submitted by the petitioner concerning this project, which include the following:

- 1) Preliminary site layout plan, dated July 15, 2019, prepared by Milone & MacBroom;
- 2) Site layout & grading plan, dated July 15, 2019, prepared by Milone & MacBroom;
- 3) USDA-NRCS farmland and hydrologic soils report, provided by Milone & MacBroom; and
- 4) Greenskies Renewable Energy, LLC Permit Drawings for the Stonington PV Solar Facility, dated August 9, 2019.

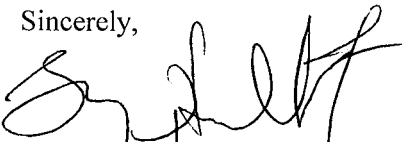
Department staff also met with Greenskies representatives to discuss the project background, proposed site plan, existing site conditions, how Greenskies intends to handle and manage the prime farmland soils, and how Greenskies would incorporate agricultural dual uses on the site.

Based on the above submittals and discussions, and pursuant to Section 16-50k(a) of the Connecticut General Statutes, the Department hereby represents to the Council that this project, as proposed, will not materially affect the status of such land as prime farmland provided that the following minimum conditions are met:

1. The handling and management of any/all prime farmland soils disturbed by construction activities is in accordance with energy industry best management practices, adhering to the most current Federal Energy Regulatory Commission (FERC) guidelines;
2. Any/all prime farmland soils are separated and stored on the farm site, and shall be used and applied solely for agricultural purposes;
3. In consultation with the farmland owner(s), a Farmland Restoration Plan shall be developed for the property to restore, at a minimum, an amount of acreage equivalent to the area disturbed, throughout the farm property for current and future agricultural purposes;
4. The Department shall administer the Farmland Restoration Plan. Such Farmland Restoration Plan shall be prepared by a soil scientist who is approved by the Department of Agriculture, and is currently on contract with a Conservation District located in Connecticut, for the purposes of preparation and review of Farmland Restoration Plans;
5. Greenskies shall be responsible for the costs of the farmland restoration work;
6. In consultation with the Department of Agriculture, Greenskies shall conduct at least two co-location or dual-use agricultural activities on the site. Such co-location or dual-use activities shall include but are not limited to, creating native pollinator habitat, beekeeping, small livestock grazing, and select crop propagation; and
7. Any/all agricultural research reports by the University of Connecticut, University of Connecticut Cooperative Extension, and/or the Connecticut Agricultural Experiment Station of the dual-use agricultural activities conducted on the site shall be submitted to the Department.

While the Department of Agriculture believes any loss of prime farmland is of concern, we also fully appreciate that agricultural producers need to have the ability to make business decisions that are in the best interest of their farms and their families. With these reasonable mitigation steps, this project should be allowed to proceed with the Council's declaratory ruling process. Please contact Stephen Anderson if you have any questions or concerns regarding this letter.

Sincerely,



Bryan P. Hurlburt
Commissioner

cc: *Lee D. Hoffman, Esq., Pullman & Comley, LLC*
Gina Wolfman, Greenskies Renewable Energy, LLC
Stephen Anderson, Connecticut Department of Agriculture
Cameron Weimar, Connecticut Department of Agriculture