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July 23, 2021

Commissioner Katie Dykes
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

Re: STEPS – Solar Development Process

Dear Commissioner Dykes,

Connecticut Farm Bureau Association strongly supports Connecticut's commitment to deploying renewable energy projects to reduce greenhouse gas emissions and our dependence on fossil fuels. Solar, wind, anaerobic digesters are all technologies that we should be embracing and promoting to meet our renewable portfolio.

Connecticut Farm Bureau Association is keenly aware and concerned about the loss of our productive farmland to residential, commercial, and solar development projects that take land out of agricultural production. As the state's largest agricultural advocacy organization, we are equally protective of private property rights and the ability of any one farmer or farmland owner to do as they wish with their property within the constraints of state and local land use laws and regulations. We understand and appreciate the fact that revenue from solar projects can help diversify farm income.

Connecticut farmland is a finite resource. We are living in a state where consumer demand for food exceeds the amount of food being produced be it dairy, produce or protein. We have a robust Farmland Preservation Program that publicly funds the permanent protection of prime and important farmland.

We must take a holistic approach to the wise use of our available farmland if we are going to address the acute issue of securing and sustaining a local food supply. Comparable to reducing our dependence on fossil fuels, should be reducing our dependence on a food supply routinely procured from thousands of miles outside of Connecticut.

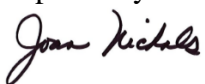
Connecticut Farm Bureau Association requests the following considerations when siting commercial solar projects:

1. Disincentive the location of large scale solar commercial solar projects on prime and important farmland.
2. Take a “smart growth/landscape” approach whereby unproductive areas such as rooftops, brownfields, underutilized or abandoned commercial and industrial sites, the least productive farmland soils, defunct gravel sites, utility right of ways and easements and other comparable sites are given siting priority over productive farmland soils.
3. Require that solar developers be required and bonded to a land reclamation plan once the project is decommissioned so that land can be put back into agricultural production.
4. Add a member to the CT Siting Council who can objectively represent the interests of agriculture.
5. Prioritize and incentivize dual use projects such as canopies in parking lots that provide shade and can support solar arrays.
6. Prioritize and incentivize dual use of solar and agriculture whereby panels are installed in such a manner that the land can be used for crop and livestock production where farming continues to be the primary use of the land with solar as an accessory or secondary use.
7. Require new commercial development to have solar development as part of the approval process whether the panels are located on rooftops or on parking lot canopies.
8. Place a moratorium on the approval of any new, large scale commercial solar projects until the proceeds from this scoping process are fully vetted and the state develops a smart growth approach and plan for solar development.

Connecticut Farm Bureau Association welcomes the opportunity to actively participate in future stakeholder groups. We look forward to working with CT DEEP to meet the challenge of meeting our renewable energy goals while protecting our fragile and vulnerable farmland.

Connecticut Farm Bureau Association (CFBA) is a non-profit membership and advocacy organization representing nearly 2,500 farming families in the state of Connecticut.

Respectfully submitted,



Joan Nichols
Executive Director