



June 25, 2021

Katie Dykes, Commissioner of Dept. of Energy and Environmental Protection  
at [DEEP.OPPD@ct.gov](mailto:DEEP.OPPD@ct.gov)

RE: STEPS for Solar Development

Dear Commissioner Dykes,

Thank you for the opportunity to comment on the proposed STEPS for Solar Development in Connecticut. The Council on Soil and Water Conservation has been directly involved in the Governor's Council on Climate (GC3) with many of its members active participants in the Working and Natural Lands subgroups. The Council understands the urgency of addressing the existential threat of climate change and the need to expand clean energy including solar.

To ensure a sustainable and resilient Connecticut in a just and equitable manner, we must work to address both climate change mitigation and adaptation simultaneously. Therefore, efforts to support sustainable energy generation should not come at the expense of the ecosystem services provided by our working and natural lands. As acknowledged in the GC3 reports, even if we stopped all GHG emissions today, we would continue to see the effects of climate change in our communities and across the landscape. We now know that there is high confidence in changes to Connecticut's environment through mid-century (2050) with sea level rise expected to reach 20" and average temperatures to increase by 5°F (2.7°C). This will not only result in acute problems associated with storm and heat events, but with chronic challenges related to sea level rise, food supply, water resources, and biodiversity.

The Council fully supports the creation of a stakeholder group on siting of large scale solar and the evaluation of solar siting as recommended in the Integrated Resources Report (IRP) and the GC3 Phase I report, respectively. We respectfully ask that you consider the appointment of a Council representative to serve on stakeholder group. The Council and its members have considerable expertise in the ecosystem services provided by our working and natural lands. Several members of the Council served on

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the GC3 Working and Natural Lands subgroups.

Additionally, the full Council membership includes the USDA Natural Resources Conservation Service, CT Agricultural Experiment Station, UConn Extension Service, and the CT Resource and Development Council. These institutions' expertise and mission should, at a minimum, be consulted when evaluating the benefits and impacts of utility scale solar.

The following additional comments are provided on the 3 sections in the proposed STEPS document:

#### Tentative Objectives:

The ecosystem services provided by working and natural lands are critical for addressing climate change mitigation and adaptation. This should include looking at food systems/food security and public drinking water supplies. When discussing energy, we discuss the actions needed locally but within a global context. We need to do the same with food supply. We recommend adding the following additional tentative objectives:

- Include consideration and valuation of ecosystem services provided by working and natural lands in meeting climate change mitigation and adaptation goals.
- Recognize the challenges facing our national food system from a changing climate, and the role that Connecticut will play in the development of a more secure, local/regional food system.

#### Tentative Facility Scope:

During the public hearing, there was much discussion about the limitation of siting of solar based on existing electric grid infrastructure. In essence, we are allowing the existing infrastructure to determine where solar will be sited, rather than determine where solar should be sited from an environmental planning perspective. This will not get us to a modern grid and will not replace the challenges from storm events etc. The scope should be expanded to consider how a robust modern grid should be developed to properly locate large scale solar. This should include how to incorporate micro-grids and storage.

The scope should include existing installations as well, so that remediation can be applied on existing sites in order to attenuate environmental impact and improve long term outcome.

## Potential Topics

#1 should be expanded to include source water (drinking water) protection.

#2 should include all forests, not just core forests. The numerous ecosystem services provided by all forests need to be evaluated.

An additional topic for stakeholder engagement should be specific to agriculture, food security, and dual use. This topic is large enough for its own focus group.

The Council looks forward to working with DEEP and the various state agencies as we work to both mitigate and adapt to climate change.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lilian Ruiz', with a stylized, cursive script.

Lilian Ruiz, Executive Director

*The Connecticut Council on Soil and Water Conservation is set up by State Statute to assist the Commissioner of the Department of Energy and Environmental Protection (DEEP) with the coordination of soil and water conservation protection and management across the state. The Council brings together local, state, and federal agencies involved in such matters with its membership including the 5 Conservation Districts, DEEP, Dept of Agriculture, UConn Extension, USDA Natural Resource Conservation Service, USDA Farm Service Agency, CT Agricultural Experiment Station, and the CT Resource and Development Council. There is a similar coordinating body in every state, creating a national network of state soil and water conservation agencies providing for technical transfer of scientific knowledge and best practices across the nation.*