

# CONNECTICUT Land Conservation Council

## Comments

CT DEEP Sustainable, Transparent and Efficient Practices for Solar Development (STEPS)

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Thank you for this opportunity to present comments as part of the stakeholder engagement process on Sustainable, Transparent and Efficient Practices (STEPS) for Solar Development. The Connecticut Land Conservation Council (CLCC) appreciates the opportunity to participate in this process to assist in identifying policies, legislative actions, and best practices, particularly related to siting and permitting of large-scale solar energy infrastructure projects in Connecticut.

The Connecticut Land Conservation Council (CLCC) is the state's umbrella organization for the land conservation community. We advocate for land conservation, stewardship and funding, and work to ensure the long-term strength and viability of land conservation in Connecticut. As a coalition organization, CLCC works with Connecticut's robust land trust community (~130 — the third most in the country), as well as conservation organizations, municipalities, councils of government, regional conservation partnerships, and other entities committed to land conservation and addressing climate change at the local level.

Within the context of our work, these efforts are most often focused on natural climate solutions — forestland, healthy soils, wetlands and grasslands protection, as well as urban forestry, tree planting, and other green infrastructure projects. CLCC was also a proud member of the Governor's Council on Climate Change (GC3) Forests Sub-Group.

Before addressing some of the specific discussion points and questions as part of the STEP stakeholder process, I would like to share for the record the following excerpts from CLCC's testimony in connection with **HB 6498 An Act Concerning The Siting Of Certain Solar Facilities On Farmlands And Core Forests**. CLCC encourages DEEP to review the testimony submitted for the record in connection with that bill, as well as the GC3 Forests Sub-Group and other Working and Natural Lands Working Group Sub-Group Reports, when developing the content of the listening sessions and other opportunities for stakeholder engagement.

**The Challenge:** The GC3 Report underscores the overlapping impacts that climate change has on our most vulnerable communities, our environment, and our public health. Addressing these impacts and supporting the state's efforts to reduce greenhouse gas emissions by 45 percent by 2030 requires a multi-faceted approach — from a reduction of energy use and shift to renewable energy to ramped-up investments in land conservation, and other natural climate solutions. Among the challenges in implementing the recommendations is ensuring that the pursuit of one strategy does not undermine the benefits of another.

**The Importance of Natural and Working Lands:** The GC3 Report adopts many of the recommendations from the Working and Natural Lands Working Group recognizing that our state's forestlands, natural areas, and working lands are among our strongest defenses against the impacts



of climate change. The benefits of these natural climate solutions to public health, the economy, and environment include protecting biodiversity, reducing the risks and impacts of flooding, filtering pollutants from the air, and absorbing and storing carbon.

These benefits underscore the sense of urgency in protecting our forests and farmland, which are being lost at an alarming rate. Of the 59% of the state that is forested, ~53% is core forest—large blocks more important for wildlife habitat, drinking water supply protection, ecological resilience, and sustainable forest products. Core forests of 500+ acres are declining rapidly—losing ~120,000 acres from 1985-2015 to fragmentation and development.<sup>1</sup> With respect to farmland, from 2001-2016, 23,000 acres of the state’s farmland were developed or compromised, putting Connecticut in the top four states nationally for the percentage lost.<sup>2</sup>

**The GC3 Report Recommendations:** Recognizing that forestland (particularly core forests) and healthy soils work both ways in mitigating climate change impacts — absorbing greenhouse gases and also preventing the release of significant levels of carbon emissions that would be caused by deforestation and conversion of open lands to active development (including for large scale solar infrastructure) —The GC3 Report recommends:

*Evaluat[ing] approaches and best practices for siting of renewable and non-renewable energy infrastructure, to avoid loss of forests, farmland and other sensitive lands. As Connecticut deploys large-scale solar projects, it is important that this development does not supersede other climate change mitigation strategies, including the carbon sequestration and storage potential of natural and working lands. (Recommendation 25, Page 37)*

### Input on STEPS

- **Objectives:** CLCC generally supports the tentative objectives as identified in the June 7 Solar Siting and Permitting Engagement Notice. The challenge will be undertaking implementation steps that meaningfully meet those objectives.
- **Proposed Listening Session Topics:** CLCC generally supports the proposed listening session topics and agrees with the recommendation to structure the sessions at the same time each week as was done with the GC3 webinars. We suggest DEEP add a session that provides an introduction to the state’s solar siting process which is very confusing to most people, who are not familiar with the Siting Council and associated regulatory process.
- **Stakeholder Engagement Process:** Regarding DEEP’s request for input as to the stakeholder process and who should be consulted and/or at the table, CLCC strongly recommends seeking input from Connecticut’s land trust community. As stated above, by the very nature of their work, land trusts are critical to addressing the impacts of climate change. They are also important partners when it comes to siting renewable energy development. Land trusts are engaged locally and often regionally in strategic conservation planning, including prioritizing acquisition and stewardship activities around resilience. With intimate knowledge of land and other natural and cultural resources in their communities, land trusts are valuable partners in providing insights, information and other assistance when evaluating the propriety of a site for development.

Thank you for this opportunity to provide our comments. We are happy to answer any questions you may have and continue to participate in the STEPS stakeholder engagement process.

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<sup>1</sup> GC3 Working and Natural Lands Working Group, [Forests Sub-Group Final Report](#), November 6, 2020, page 7.

<sup>2</sup> American Farmland Trust, 2020 [Farms Under Threat: The State of the States](#), May 20, 2020, page 26.