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Action for our region's environment.

## **COMMENTS ON DEEP SUSTAINABLE TRANSPARENT AND EFFICIENT PRACTICES FOR SOLAR DEVELOPMENT (STEPS) SCOPE**

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*Save the Sound is a nonprofit organization representing over 4,200 member households and 10,000 activists statewide. Our mission is to protect and improve the land, air, and water of Connecticut and the entire Long Island Sound region. We use legal and scientific expertise and bring citizens together to achieve results that benefit our environment for current and future generations.*

We are pleased to submit the following comments on the solar siting and permitting process and the scope of the stakeholder engagement process for the Connecticut Department of Energy and Environmental Protection's (DEEP) Sustainable, Transparent and Efficient Practices (STEPS) for Solar Development.

The development of solar generating facilities is vital to achieving Connecticut's emissions-reduction goals and mitigating the overwhelming consequences of the climate crisis. Unfortunately, poor planning and misplaced economic incentives have directed some solar development to threaten irreplaceable natural resources, such as core forest and prime farmland. Even when adequately sited, the construction of solar arrays, like all construction activities, can have negative environmental consequences when left unaddressed. Proposals which attempt to trade environmental integrity for climate mitigation present a false dichotomy – with broad public input, this process should identify numerous opportunities for Connecticut to more effectively preserve the environment while simultaneously creating a more predictable process for solar developers.

We ask that DEEP ensure the following important topics are included in the stakeholder engagement process and addressed within the resulting guidance:

- **Stormwater** – Stormwater impacts from large, ground-mounted solar arrays are currently addressed by DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. However, these effects should be considered in all aspects of the STEPs process, as stormwater runoff, and its downstream impacts, is one of the most serious problems facing Connecticut today. While incorporating stormwater considerations into all parts of solar development planning, DEEP should consider strengthening stormwater protections for any development projects. This may require reviewing soil disturbance standards and requirements to incorporate vegetative cover.
- **Drinking Water Lands** – Source lands for drinking water supplies merit particular protection from any form of construction. Construction activities and stormwater runoff can degrade the quality of source lands, threatening an irreplaceable resource vital to

serving Connecticut residents and preserving natural spaces. Extensive coordination with the Department of Public Health and drinking water authorities should be required before siting a project in or near drinking water lands.

- **Grasslands** – This process should address the viability of grasslands for solar development. While much of the focus tends to be on protecting core forest and prime agricultural lands, grasslands can serve as an important ecosystem for some animals, including state-listed species. In the interest of preserving a diversity of ecosystems, DEEP may need to develop a process for ascertaining the value of certain grasslands and any necessary protective measures.
- **Brownfields & Developed Spaces** – Streamlining regulatory hurdles and incentivizing solar development on brownfields must continue to be a priority. Wherever possible, solar development should occur on already-developed land instead of disturbing natural spaces and risking harmful environmental impacts. While installing solar arrays on brownfields can be less controversial and harmful than developing on greenfields, it can be prohibitively expensive when combined with the costs of remediation. This process should prioritize identifying opportunities that further incentivize developing on brownfields without jeopardizing public health. Incentives should also be added for utilizing other already-developed areas, such as the roofs of very large public and commercial buildings or as canopies over parking lots.
- **Resiliency, Microgrids, & Distributed Generation** – In addition to prioritizing the increased deployment of solar generation and protecting the environment, this process should also consider how to use solar deployment to improve the resiliency of the electricity grid. Climate change not only compels us to cut our emissions, but also to increasingly protect our citizens from violent storms and unpredictable weather. The development of microgrids in vulnerable and isolated areas can help to service populations when they might otherwise lose access to the broader distribution system. Resiliency should also be a priority when considering how to integrate distributed generation into the grid.
- **Environmental Justice** – DEEP needs to actively solicit input from the elected officials and community leaders of disadvantaged populations in Connecticut, including cities, rural areas, and tribal communities. Gathering input on the siting of renewable energy and on the energy needs of disadvantaged communities is important to ensuring that Connecticut's renewable energy mobilization addresses the needs of all of Connecticut's citizens.
- **Equivalent Development** – Building solar arrays should not be more difficult than building other new development projects, such as big box stores. For example, core forest should be protected from unwise solar development, but those restrictions should not just apply to the renewable energy resources we need – they should apply to everything. Core forest protections should be applied to any form of high-impact development.

- **Planning Data Standards** – In order to effectively protect Connecticut's natural resources, and to provide predictability for solar developers, we need to ensure access to high-quality and comprehensive GIS data. Efforts to pass legislation creating a centralized state office hosting comprehensive GIS data for every Connecticut municipality have faltered. It is time to establish that office in order to improve planning for all projects across Connecticut.

Thank you for the opportunity to comment on the scope of this process. We look forward to participating in the coming sessions.

Respectfully submitted,

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