

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH



Deidre S. Gifford, MD, MPH  
Acting Commissioner

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Governor  
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Lt. Governor

### Environmental Health and Drinking Water Branch

June 25, 2021

Nicole Lugli  
Department of Energy and Environmental Protection  
Office of Planning and Program Development  
VIA Email: [DEEP.OPPD@ct.gov](mailto:DEEP.OPPD@ct.gov)

Subject: Sustainable, Transparent and Efficient Practices for Siting Solar Development

Dear Ms. Lugli:

The Connecticut Department of Public Health (DPH) has statutory authority over the purity and adequacy of Connecticut's public drinking water sources of supply. Public drinking water supply watersheds and aquifer protection areas make up approximately 18 percent of the land area of Connecticut, providing high quality drinking water to over 2.5 million CT residents, many of which reside in CT's larger cities. Much of this land is intact forests or other land maintained in its natural state; and while water companies have preserved the land they own within these source water areas, a majority of these areas are not protected from development. The capacity for forests to filter pollutants and provide other water quality benefits is well studied. The use of high quality water for drinking water sources of supply not only provides public health benefits, but also economic benefits in that it costs less to treat and deliver water that is of higher quality to begin with.

The DPH has reviewed the Tentative Objectives, Tentative Facility Scope and Potential Topics for the stakeholder engagement process on Sustainable, Transparent and Efficient Practices (STEPS) for Solar Development and is providing the following comments for your consideration:

- The second bullet under Tentative Objectives should be revised in the following manner:
  - Include consideration of local laws concerning zoning, the environment ~~[or]~~ **and** public health and safety;
- In recognition of the public health and economic benefits of retaining natural systems within public drinking water supply source water areas, the DPH requests that public drinking water supply watersheds and aquifers are specifically included as resources for which adverse impacts should be mitigated in the third bullet of Tentative Objectives.



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- Within the Tentative Facility Scope, it is unclear how a “larger project” would be defined. Objective measures or a decision tree should be developed to ensure a project clearly meets the criteria to result in a stakeholder engagement process.
- The DPH agrees that stakeholder engagement in an important function in the successful improvement of the transparency, predictability, and efficiency of solar siting and permitting processes in Connecticut. There are many stakeholders to consider when a project is proposed for development within a public drinking water supply source water area. The DPH requests to be included as a stakeholder for such projects. Other stakeholders that should be engaged in the process include but are not limited to:
  - Water company representation
  - Local health departments or districts serving the municipalities within both source water area and water service areas
  - Customers of the water companies who benefit from preservation of land within a public drinking water source of supply

Thank you for considering these comments. If you have any questions, you may email [Eric.McPhee@ct.gov](mailto:Eric.McPhee@ct.gov) or [Patricia.Bisacky@ct.gov](mailto:Patricia.Bisacky@ct.gov) .

Sincerely,



Lori J. Mathieu  
Public Health Branch Chief  
Environmental Health and Drinking Water Branch

C: Heather Aaron, MPH, LNHA, Deputy Commissioner, DPH