June 17, 2021

Commissioner Dykes

CT Department of Energy and Environmental Protection

79 Elm Street

Hartford, CT 06106-5127

RE: STEPs for Solar Development Input

Dear Commissioner Dykes:

Thank you for this opportunity for the public to comment on Solar Energy Development in the state of Connecticut. We are writing in response to DEEP’s Notice of Proceeding, Scoping Meeting and Opportunity for Public Comment.

Save the River-Save the Hills, Inc. (STR-STH) is increasingly concerned about the adverse environmental effects within our local towns that these large and often poorly sited developments are creating. As stated by Vice President of STR-STH at the Scoping Zoom meeting, we have 4 points we would like to make within the parameters of the Public Comment portion of the STEPs for Solar Development project.

Primarily, we are concerned that the towns have little say in the siting of large solar installations within their boundaries and that their local regulations - many of which were created with local taxpayers’ money over many years through studies and with expertise specific to the environment for that town - are not required to be followed by these installations regardless of how many acres they cover. We strongly recommend that town planners be involved in the planning and development of these projects in their particular town. They should also be involved with this STEPs for Solar Development process. At the very least, local town development regulations should be adhered to when developing ground mounted solar projects. And town planners should not have to ASK to be party to a CT Siting Council Petition. They should be AUTOMATIC PARTIES and able to participate when the CSC is notified of a Petition. Finally, given the lack of adequate staff at DEEP to oversee these projects as they are built, local town planners and their staff should be able to periodically review the onsite processes and report back to the CSC and DEEP.

Second, STR-STH would like to see the words “and environmentally responsible” added to the first Objective so it would read: “Ensure that new solar generation projects can be sited and built in a predictable, efficient, transparent and **environmentally responsible** manner;”. STR-STH feels that an underlying ideal for any environmental project, which these solar developments profess to be, should be steering clear of creating other environmental hazards, such as runoff of silt into surrounding trout streams. The overall process should have a net positive impact on the environment and not just focus on the resulting energy produced. If a 16MW solar installation takes down 75+ acres of core forest and wipes out wildlife and their homes, sells the topsoil, regrades the hills and thus releases all of the carbon that was sequestered there while reducing the amount of carbon dioxide returned to the skies as oxygen, creates more runoff that needs to be captured in now algae and mosquito larvae infested basins, we ask honestly – was that a net gain for the local environment?

Third, we would like to see some wording regarding timing within the Objective 3. For example, it could read: “Avoid, or minimize and mitigate, to the maximum extent practical, adverse impacts on the environment, agriculture and natural resources **during site preparation, construction, and post-construction.**” And to ensure that it is monitored, DEEP should allow the town to monitor for environmental issues &/or adverse impacts during all three periods of time. Our fear is that many of the stormwater issues that these installations create happen during the post-construction timeline.

We would also like Objective 3 to specify that it is not only the site itself, but the surrounding ecosystems that are in focus. The resulting objective then would read: “Avoid, or minimize and mitigate, to the maximum extent practical, adverse impacts on the environment, agriculture and natural resources **of the site and surrounding ecosystems**, during site preparation, construction, and post-construction.”

A follow-up to the third point is that these STEPs objectives should not just be focused on future sites. We think that it is imperative to the understanding of the true impacts of these large developments for currently approved and already developed and operating solar installations be reviewed for their impacts on not only the land they are covering, but the surrounding ecosystems. Adding an objective to study currently operating projects or creating a task force to review and document best practices and lessons learned to share with the solar companies and their engineers would be a great help in avoiding future disasters like the one that happened in East Lyme in 2014 where tributaries to the Niantic River Estuary were silted over by an estimated 800 cubic tons of sediment during a large rain event.

Finally, an issue that was not brought up directly on the Zoom meeting, but was briefly mentioned in comments by two speakers, is the fact that the Energy side of DEEP choses the sites and the train can get very far down the CT Siting Council track before other DEEP and state departments weigh in on the site. In reviewing documents for many Petitions, STR-STH has noticed that some serious concerns raised by other departments in DEEP do not seem to have as much weight in the CSC process. This has us wondering how much “Environmental Protection” can be expected by an organization that has “Energy” first in its name. We would like to see the other departments within DEEP gain equal footing for their professional opinions on these solar projects during the CSC process.

Thank you once again for your consideration of our input. We look forward to participating in the future meetings of this STEPs process.

D Moshier-Dunn

Deb Moshier-Dunn

Vice President, Save the River-Save the Hills, Inc.