

Dumaine, Julia

From: Brandy Morenko Campbell <bmorenkocampbell2@gmail.com>
Sent: Tuesday, July 6, 2021 10:25 AM
To: DEEP STEPS
Subject: RE: STEPS

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Dear DEEP,

Please accept my personal comments, questions, and suggestions below for your consideration. I will also attend and may bring these to the opportunity for public comment as well. Please let me know if you have any additional questions or if there is anything else I can do to be of any assistance.

Kindly,
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The Public Trust Doctrine holds that the state must protect its natural resources for its citizens, both now and in the future. While some may argue that clearing land for solar protects the greater global environment, it does not protect the state of Connecticut from irreversible habitat destruction and global loss of biodiversity. The state must develop robust legislation and land management practices to guide solar land clearing initiatives in order to protect its natural resources for all its citizens.

How does the state and/or DEEP ensure that the general public is fully aware of and has appropriate opportunity to provide input into solar farm site proposals? A DEEP email or a link on a website is not sufficient. Is the public aware of ground mounted solar array impacts to our environment? If not, the state needs to ensure that it's citizens are fully aware of its cost:benefit. The public also needs to be aware of and understand the entire ground mounted solar array siting process.

Our natural habitats should be thoroughly and critically evaluated to ensure they are not closing off wildlife corridors. Have our wildlife corridors, as well as land with corridor potential, been identified? If so, where can the public access this information?

Reducing/eliminating habitat fragmentation, edge effect, and maintaining wildlife corridors must take priority over green energy goals. Without healthy and appropriately sized habitats that maintain (or increase) our local wildlife biodiversity, we cannot claim to be green.

How does the state manage potential conflicts of interest between developers, financial institutions, elected government officials, and land management/environmental protection groups? This proverbial elephant in the room needs to be addressed.

When was the CT Natural Diversity Data Base last updated? How complete is this dataset? If it is not complete or accurate, this cannot be used as a decision making tool.

What is being done to ensure the CT Natural Diversity Data Base data resource can drive accurate decisions?

What references or data tools can be used to ensure that sustainable land management decisions that involve solar array land clearing do not result in habitat fragmentation, increased edge effect, loss of biodiversity, or impact to critical habitat for threatened or endangered species? The state of Connecticut may have an opportunity to lead in this environmental discussion and create robust data sets or data gathering practices.

How much of our CT natural resource and biodiversity data is drawn from the IUCN and ESA, which are known to only capture a small fraction of endangered and threatened flora and fauna?

What specific criteria is used to determine if a land clearing project does not have “substantial” adverse environmental effects? How is “substantial” defined? This needs to be clarified and objectively defined to prevent subjective opinions, bias, and ulterior motivations from impacting decision making.

Why does every green energy land clearing initiative *not* require a Certificate of Environmental Compatibility? While this would be resource intensive and time consuming, shouldn't all green energy goals be compatible with the environment? While solar is an exciting technology and is a piece of the energy solution, we need to ensure we are doing our due diligence and proceed thoughtfully and cautiously, since these initiatives can also permanently destroy our natural environment.

If third party environmental assessment groups, that are brought in to evaluate potential solar sites for the Siting Council, are either financially and/or politically motivated to install solar farms, how do you have confidence that our natural resources and open spaces are adequately represented in the conversation? Who is the unbiased independent representative for the environment? If there is not an entity currently identified for this role, the state should identify one. Siting Council should be made up of individuals who have or have had absolutely no potential for conflicts of interest or political aspirations.

How many solar farm sites have been moved or denied approval due to environmental concerns? If so, for what reasons? Is this consistent across all applications?

How much open space land is needed for ground mounted solar arrays in CT to meet its green energy goals? How much of our natural ecosystem are we willing to lose to aggressive solar initiatives, given that our open space goals are falling short?

How do we increase our open spaces (natural habitats) while clearing large plots of land for solar power? We need to exhaust all other non-habitat destructing options for solar array placement before we clear land for solar arrays.