



Connecticut Association of Conservation Districts

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June 23, 2021

Katie Dykes, Commissioner
Department of Energy and Environmental Protection
at DEEP.OPPD@ct.gov

Re: STEPS for Solar Siting

Dear Commissioner Dykes,

Thank you for the opportunity to comment on the proposed STEPS process for the siting of large scale solar in Connecticut. Connecticut's Conservation Districts recognize the importance of moving towards a cleaner energy future. We also recognize the importance of our natural resources, not only in mitigating climate change but also in adapting to the impacts of climate change that we are already witnessing in the field.

Connecticut's conservation districts provide technical assistance and education to farmers, municipal officials and staff, and private landowners on soil and water conservation across the state. Much of our work is centered around protecting and improving watershed health on a landscape scale, but often working at the local level. We work closely with local municipalities on wetlands protection, stormwater management, nonpoint source pollution control, and source water protection helping to implement proper erosion and sediment controls and stormwater management best management practices on construction sites. We also assist DEEP by providing inspections for stormwater permits on solar installation sites. We ask that you consider appointing a representative from the conservation districts to your stakeholder group due to their unique in-field experience with erosion and sediment control and stormwater management.

As currently designed and implemented, large scale solar projects have adversely impacted the health of our watersheds, local streams, drinking water supplies, and Long Island Sound. These impacts occur both during and post construction. The timing and intensity of construction makes it difficult to control erosion, resulting in large movements of sediment into wetlands and watercourses, degrading water quality and stream habitat. The compaction of soil from heavy equipment essentially creates an impervious surface. This combination of sedimentation and compaction is changing the hydrology of our watersheds permanently by filling wetlands with sediments, reducing infiltration to groundwater, and exacerbating water quantity issues in nearby streams by increasing flash flooding and low flow conditions.

Conservation districts also work closely with farmers on soil health, erosion control, and nutrient management. We understand the need to both protect prime and important farmland soils, and look at opportunities for dual use. When large scale solar facilities are sited on farmland, we not only lose productive farmland soils, but the loss of soil health threatens any future use of the land as farmland. To advance dual use on farmland, we will need to develop best management practices that maintain

the soil health and productivity of the farmland and avoids our most prime and important farmland soils.

The following comments on the STEPS process are offered for your consideration:

Tentative Objectives:

We recommend additional objectives that include:

- Ensure that site selection avoids land where E&S controls and stormwater management goals will be difficult to achieve, such as on steep slopes.
- Require that all large-scale solar installations maintain good soil health to allow for vegetative stabilization of the site and for infiltration post construction.

Potential Topics:

We recommend addition of the following:

A potential topic for stakeholder engagement that includes site selection, and project design that recognizes low impact development as the starting point for all stormwater management plans.

A potential topic specifically for dual use on farmland.

Thank you in advance for your consideration of these comments. We look forward to working with you to improve solar siting in the future.

Sincerely,

A handwritten signature in cursive script that reads "Denise Savageau". The signature is written in dark ink and is positioned above the printed name.

Denise Savageau, President
CACD