

C O N N E C T I C U T  
Land Conservation Council

April 12, 2023

*Sent via email:* DEEP.EnergyBureau@ct.gov

Commissioner Katie Dykes  
Connecticut Department of Energy & Environmental Protection  
79 Elm Street  
Hartford, CT 06106

Re: Comments regarding DEEP's draft Energy Procurement Request for Proposals

Dear Commissioner Dykes,

On behalf of the Connecticut Land Conservation Council, I am pleased to submit comments in response to the [2023 Procurements Final Notice](#) seeking feedback on the agency's intention to conduct two new procurements for grid-scale zero-carbon energy resources.

The Connecticut Land Conservation Council (CLCC) is the state's umbrella organization for the land conservation community, including its ~130 land trusts. Our mission is to elevate and strengthen land conservation in Connecticut.

CLCC was a member of the Governor's Council on Climate Change (GC3) Forests Sub-Group and Resilient Infrastructure and Nature-based Solutions Working Group. CLCC was also a member of the Policy on Resilient Forests for Connecticut's Future (PRFCT Future) Working Group. I currently serve as co-chair of the state Natural Heritage, Open Space and Watershed Land Acquisition Review Board.

**The Problem:** Extreme heat, frequent and destructive storms, flooding and drought conditions, poor air quality, and disappearing wildlife—Connecticut's human and non-human residents are suffering from the ill-effects of a changing climate with the hardest hit being low-income and minority communities. We are also experiencing a global biodiversity crisis of epic - and for a growing number of plant and animal species - irreversible proportions.

The climate crisis and biodiversity loss are integrally connected. The changing climate is negatively impacting habitats and ecosystems while the loss of biodiversity (and associated reduction in carbon storage capacity) contributes to and intensifies the effects of climate change. We can't address one crisis without addressing the other.

Nature is the common denominator.

**Nature-Based Solutions:** Research shows that conserving 30% of the Earth's land and waters by 2030 is the minimum commitment needed to protect essential ecosystem services and buffer against the worst impacts of climate change. This ambitious but achievable target was adopted as part of the global [COP15 biodiversity agreement](#).



Forestlands, wetlands, healthy organic soils, and other natural ecosystems are among our strongest defenses against the impacts of climate change. The myriad benefits of these nature-based climate solutions to public health, the economy, and environment include reducing the risks and impacts of flooding, filtering pollutants from the air, and absorbing and storing carbon. Experts have estimated that [nature-based solutions can contribute 20-37%](#) to keeping temperature increases below 2°C. These same ecosystems are also critical to protecting biodiversity.

Despite the essential role that nature plays in addressing the dual environmental crises of climate change and biodiversity loss, Connecticut is not nearly on track to meet its statutory land conservation goal (21% by 2023), and the state’s natural and working lands are being lost at an alarming rate:

- Of the 59% of the state that is forested, ~53% is core forest—large blocks fundamental for wildlife habitat, drinking water supply protection, and ecological resilience. Core forests of 500+ acres are declining rapidly—losing ~120,000 acres from 1985-2015 to fragmentation and development.
- With respect to farmland, from 2001-2016, 23,000 acres of the state’s farmland were developed or compromised, putting Connecticut in the top four states nationally for the percentage lost.
- Wildlife is struggling — with more than thirty-five threatened and endangered species of birds, mammals, reptiles, and amphibians, Connecticut risks losing iconic species to habitat destruction and degradation and the changing climate.
- Wetlands — essential as wildlife habitat, key to water quality, and crucial to absorbing dangerous greenhouse gasses — have suffered staggering losses of up to 65% in Connecticut.

**The Opportunity:** Recognizing that forestland (particularly core forests), wetlands, grasslands, and healthy soils (collectively “natural and working lands”) work both ways in mitigating climate change impacts — absorbing greenhouse gases and preventing the release of significant levels of carbon emissions that would be caused by deforestation and conversion of open lands to active development — The GC3 Phases I Report (January 2021) recommends:

Evaluat[ing] approaches and best practices for siting of renewable and non-renewable energy infrastructure, to avoid loss of forests, farmland and other sensitive lands. As Connecticut deploys large-scale solar projects, it is important that this development does not supersede other climate change mitigation strategies, including the carbon sequestration and storage potential of natural and working lands. The state should encourage developers to site their projects on brownfields, rooftops, parking lots, and other developed spaces. (Recommendation 25, Page 37)

With respect to forestland protection, The GC3 Report further includes a recommendation to explore a statewide “no-net-loss of forest” policy to “evaluate its feasibility, needed resources, and associated programs to maximize mitigation potential,” with consideration given to

actions that avoid forest conversion; protect healthy, intact, and resilient forests; offset all planned or permitted forest losses; and more. (Recommendation 26, Page 37) It also recommends evaluating the feasibility of permanently protecting at least 50% of core forests greater than 250 acres by 2040. (Recommendation 28, Page 37)

**CLCC Recommendations:** Consistent with these and other recommendations from The GC3 Report as well as from GC3 Working and Natural Lands Working Group sub-group and other reports (e.g. PRFCT Future Working Group), avoidance of natural and working lands should be the primary goal for the siting of large-scale solar projects and a priority for any energy development. To that end, CLCC offers the following recommendations with respect to DEEP’s draft Energy Procurement Request for Proposals:

1. Establish and include preferential siting criteria (or procurement points) to incentivize developers to site their projects on brownfields, rooftops, parking lots, and other developed spaces.
2. Establish and include negative financial incentives (and procurement point subtractions) for grid scale projects that are located on natural and working lands, including valuation for loss of ecosystem services, economic, restoration, and other real costs of installation. (For example, require solar developers to post a decommissioning bond for projects built on natural and working lands and to make payment to compensate for the loss of such lands, including valuation for loss of ecosystem services.)
3. Establish criteria for evaluating and incentivizing an applicant’s efforts to modernize the grid with distributed energy resources that include maintaining ecosystem services provided by natural and working lands and incentivizing equitable access to renewable energy.
4. Establish siting criteria that shall take into consideration environmental factors including but not limited to natural resources and habitats, water quality and quantity, topography, equity, and degree of development.
5. Establish and include criteria for consistency with local laws concerning zoning, wetlands, and other regulations related to the environment and/or public health and safety.

Supporting the state’s ambitious carbon neutrality goals requires a multi-faceted approach — from a reduction of energy use and shift to renewable energy to significant investments in land conservation, and other natural climate solutions that also protect biodiversity. The key to our success is ensuring that the pursuit of one strategy does not undermine the benefits of another.

Thank you for this opportunity to provide our input.

Sincerely,



Amy Blaymore Paterson, Executive Director