memo

To: Katie Dykes, Commissioner, Dept. of Energy & Environmental Protection
Victoria Hackett, Deputy Commissioner, Dept. of Energy & Environmental Protection
Betsey Wingfield, Deputy Commissioner, Dept. of Energy & Environmental Protection
Mason Trumble, Deputy Commissioner, Dept. of Energy & Environmental Protection

From: Audubon Connecticut, Robert LaFrance, Director of Policy
Connecticut Association of Conservation Districts, Denise Savageau, President
Connecticut Forest & Park Association, Eric Hammerling, Executive Director
Connecticut Land Conservation Council, Amy Blaymore Paterson, Executive Director
Rivers Alliance of Connecticut, Alicea Charamut, Executive Director
The Nature Conservancy in CT, Nathan Frohling, Director of External Affairs
Working Lands Alliance: a project of American Farmland Trust, Kip Kolesinskas, Co-Chair and Chelsea Gazillo, Director

Date: February 17, 2021

Re: **Comments on the *Draft Integrated Resources Plan: Pathways to Achieve a 100% Zero Carbon Electric Sector by 2040* dated December 2020.**

Thank you for the opportunity to comment on the *Draft Integrated Resources Plan: Pathways to Achieve a 100% Zero Carbon Electric Sector by 2040* (IRP). As members of Connecticut's environmental community, we fully understand the severe threats posed by climate change and the urgent need to curtail GHG emissions by the expansion of energy efficiency and the deployment of renewable energy. We also recognize that our working and natural lands have an important role to play in climate mitigation, adaptation, and resiliency. Indeed, we were honored to serve as leaders and/or participants on the various subgroups on the Governor's Council on Climate Change (GC3) and recognize the importance of the IRP.

Connecticut is fortunate to have a rich and diverse natural history that provides numerous ecosystem services critical to maintain as we move towards a more sustainable future. Our working and natural lands face many challenges, including impacts from climate change but also pressure from development and other human impacts. We now know that there is high confidence in changes to Connecticut's environment through mid-century (2050) with sea level rise expected to reach 20" and average temperatures to increase by 5°F (2.7°C). These important lands are already creating nature-based solutions to climate change and, with proper management, will continue to do so as we adapt to 2050 and beyond.

Protecting and enhancing our existing natural resources is low-hanging fruit full of best management practices available to resource managers as we adapt to a changing climate. This is especially true in environmental justice communities where relocation is not an option. Protecting our forests, including urban forests, is the first step to provide a clean and abundant water supply resilient to drought, mitigate heat island effects, and attenuate flooding. Maintaining our supply of prime agricultural land provides a secure local food supply and reduces market disruptions in the event of a natural disaster linked to climate change or a global pandemic and the carbon footprint of transporting foods from afar. Safeguarding wetlands provides nature-based flood control, vector disease control, and is critical to maintaining our biodiversity. Caring for our rivers also provides for clean water, diverse ecosystems, a boost to local economies, and is critical to the health of Long Island Sound. In addition, soils of our agricultural lands, forests, and wetlands are important carbon sinks with the potential to continue to store and sequester carbon when effectively managed as intact ecosystems. Balancing the need for these vital ecosystem

services with our need to expand renewable energy will be instrumental to our success in creating a resilient Connecticut.

Given the importance of our working and natural lands, we have focused our review of the draft IRP on the need to acknowledge and consider the environmental, economic, and social benefits of ecosystem services provided by such lands in the proper siting of renewable energy.

Objective 1: Decarbonizing the Electricity Sector

We fully support the adoption of a statutory target of zero carbon emissions for the electricity grid by 2040. This is needed to stop the acceleration of climate change past 2050. To achieve this goal, distributed energy resources (DER) will need to be brought on-line at a more robust pace.

Large scale solar, residential solar, and perhaps other emerging renewable technologies all could be ramped up to meet Connecticut's zero carbon goals. It should be determined what the ratio between USR and DER should be. Although it is easy to assume that economies of scale favor USR, that is when you only look at direct costs on installation and maintenance. If you figure in externalities, such as ecosystem services lost because of USR installation, this may not be the case. Direct cost analysis also does not take into consideration the number of green jobs created by DER and it does not look at the loss of benefits of rooftop solar in environmental justice communities. Additionally, USR maintains a centralized transmission system that is not as resilient to external events such as storm events as DER, that includes microgrids, would be. Finally, depending upon siting, DER may also reduce transmission losses and congestion issues.

To better inform long-term policy on the siting of renewable energy while protecting working and natural lands, the IRP should recommend in its action plan, that a work group be formed to review the current status of USR and DER resources and determine what the appropriate mix should be. Understanding the size and need of USR is needed to ensure for proper siting. Similarly, a greater understanding of the carbon benefits provided by working and natural lands is also needed.

Objective 4: Optimal Siting of Generation Resources

The proper siting of USR depends on proper planning based on guidance documents that recognize the value of ecosystem services provided by working and natural lands and avoidance of areas unsuitable for development. The CT Council on Environmental Quality (CEQ) has documented many of the impacts to our farm and forest land in a 2017 report entitled *Energy Sprawl in Connecticut*. The passage of PA 17-218 followed in response to these concerns requiring the CT Siting Council to consider impacts on forest and farmland. As documented in numerous comments made by CEQ and others to the CT Siting Council, the legislation did not achieve the desired effect of protecting these lands.

The Water Planning Council Advisory Group's Watershed Lands subcommittee has also been reviewing applications as they relate to drinking water supply watersheds. Additionally, the increased impervious cover and resulting stormwater runoff from USRs are creating long-term negative impacts to our water resources, creating an urgent need that cannot be ignored.

These concerns were also raised during the GC3 process and resulted in Recommendation 25. In our comments on the GC3 Phase I report, we recommended the following language: *"25. Adopt land use policies for siting of renewable and non-renewable energy infrastructure that avoid loss of forests, farmland, and other lands as well as recognize the ecosystem services they provide. As Connecticut*

deploys large-scale solar projects, it is important that this development does not supersede other climate change mitigation and/or adaptation strategies, including the carbon sequestration potential of natural and working lands and the importance function they play in providing clean, abundant water and local food supplies. The state should establish incentives to encourage developers to site their projects on brownfields, rooftops, parking lots, and other developed spaces. (cross-listed with Progress on Mitigation Strategies)."

The draft **IRP Strategy 10: Conduct a stakeholder process to improve the transparency, predictability, and efficiency of solar siting and permitting in Connecticut** is similar to the language we proposed and the language in the GC3 report. We support convening a stakeholder group that includes representatives of the environmental community that understand the extent and value of the multitude of ecosystems services provided by working and natural lands in Connecticut. We strongly recommend that the full reports generated by the GC3 Working and Natural Lands subgroups be utilized to inform this process. Prior efforts have relied on amending the Siting Council process but it is clear that any recommended policy/guidance needs to address the process prior to the submission of any permit application.

Strategy 10 calls for an inclusive, deliberative process to develop policy. We support this type of a process and understand that it will take time. It is critical, therefore, that given the rate of loss of forests and farmland to USR, and the resulting impacts to our water resources, interim guidance should be adopted immediately to prevent the most egregious applications from moving forward. Converting 500 acres of contiguous working and natural lands for a single project, instantaneously creating 500 acres of impervious cover that changes the hydrology and geomorphology of the watershed, reduces biodiversity and food security, and causes the release of greenhouse gases from the deforestation and soil disturbance activities, is not a sustainable path for meeting the challenge of climate change.

Objective 6: Balancing Decarbonization and Other Public Policy Goals

The GC3 process recognized the value of working and natural lands. Protection of these lands is incorporated into many long-standing public policies including protection of farmland, open space, and wetlands. There is no mention, however, of working and natural lands in the draft IRP apart from environmental impacts of siting large scale solar. Objective 6 on Balancing Decarbonization and Other Public Policy Goals is the precise spot to include the important role of working and natural lands, the ecosystem services they provide and how they are necessary for implementing mitigation and adaptation policies identified in the GC3 Phase I report and the draft IRP.

Thank you again for the opportunity to comment on the draft IRP. We look forward to working with DEEP, including as technical resource support, as you move forward to a Sustainable CT that includes a Zero Carbon future.

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