

CONNECTICUT Land Conservation Council

Testimony on House Bill No. 6498
Environment Committee
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Co-Chairs Cohen and Gresko, Vice-Chairs Slap and Palm, Ranking Members Miner and Harding, and members of the Environment Committee:

Thank you for this opportunity to present testimony on behalf of the Connecticut Land Conservation Council (CLCC) in support of **House Bill No. 6498, An Act Concerning The Siting Of Certain Solar Facilities On Farmlands And Core Forests (with suggested modifications.)** Approval of HB 6498 would advance the implementation of recommendations pursuant to the [Governor's Council on Climate Change \(GC3\) Phase 1 Report: Near-Term Actions January 2021](#) (GC3 Report) by providing for increased review of proposals to site solar facilities on certain forest and farm lands.

The Connecticut Land Conservation Council (CLCC) is the state's umbrella organization for the land conservation community. We advocate for land conservation, stewardship and funding, and work to ensure the long-term strength and viability of land conservation in Connecticut. As a coalition organization, CLCC works with Connecticut's robust land trust community (~130 — the third most in the country), as well as conservation organizations, municipalities, councils of government, regional conservation partnerships, and other entities committed to land conservation and addressing climate change at the local level. Within the context of our work, these efforts are most often focused on natural climate solutions — forestland, healthy soils, wetlands and grasslands protection, as well as urban forestry, tree planting, and other green infrastructure projects. CLCC was also a proud member of the GC3 Forests Sub-Group.

The Challenge: The GC3 Report underscores the overlapping impacts that climate change has on our most vulnerable communities, our environment, and our public health. Addressing these impacts and supporting the state's efforts to reduce greenhouse gas emissions by 45 percent by 2030 requires a multi-faceted approach — from a reduction of energy use and shift to renewable energy to ramped-up investments in land conservation, and other natural climate solutions. Among the challenges in implementing the recommendations is ensuring that the pursuit of one strategy does not undermine the benefits of another.

The Importance of Natural and Working Lands: The GC3 Report adopts many of the recommendations from the Working and Natural Lands Working Group recognizing that our state's forestlands, natural areas, and working lands are among our strongest defenses against the impacts of climate change. The benefits of these natural climate solutions to public health, the economy, and environment include protecting biodiversity, reducing the risks and impacts of flooding, filtering pollutants from the air, and absorbing and storing carbon.



These benefits underscore the sense of urgency in protecting our forests and farmland, which are being lost at an alarming rate. Of the 59% of the state that is forested, ~53% is core forest—large blocks more important for wildlife habitat, drinking water supply protection, ecological resilience, and sustainable forest products. Core forests of 500+ acres are declining rapidly—losing ~120,000 acres from 1985-2015 to fragmentation and development.¹ 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.²

The GC3 Report Recommendations: Recognizing that forestland (particularly core forests) and healthy soils work both ways in mitigating climate change impacts — absorbing greenhouse gases and also preventing the release of significant levels of carbon emissions that would be caused by deforestation and conversion of open lands to active development (including for large scale solar infrastructure) —The GC3 Report 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)

HB 6498 - A Step Forward: Consistent with these recommendations to avoid conversion of these valuable lands, the amendments proposed by HB 6498 are a step forward in strengthening existing legislation with respect to solar siting on core forest, prime farmland, and farmland of state-wide importance by: (1) expanding the application review process to include facilities of a certain size that currently avoid a higher level of scrutiny; (2) requiring a decommissioning bond for facilities located on such lands; and (3) enhancing the public’s ability to access information concerning applications for facilities to be located on such lands.

To further strengthen the bill, CLCC respectfully recommends the committee consider adding the following provisions to HB 6498: (1) expand the Connecticut Siting Council membership to include a representative from an organization with expertise in working lands (including forestland); and (2) explore the establishment of a compensatory mitigation program requiring solar developers to make payment to compensate for the loss of core forests, prime farmland, and farmland of state-wide importance (a recommendation of the [GC3 Forests Sub-Group Report](#), page 50.)

Thank you for this opportunity to provide our comments. I’m happy to answer any questions you may have.

¹ GC3 Working and Natural Lands Working Group, [Forests Sub-Group Final Report](#), November 6, 2020, page 7.

² American Farmland Trust, 2020 [Farms Under Threat: The State of the States](#), May 20, 2020, page 26.