



STATE OF CONNECTICUT
COUNCIL ON ENVIRONMENTAL QUALITY

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To: DEEP.EnergyBureau@ct.gov

The Council on Environmental Quality (Council) provides the following comments in response to the Department of Energy and Environmental Protection's (DEEP) request for comments to help inform the development of DEEP's draft request for proposals (RFPs) to secure zero carbon resources.

On or about June 25, 2021, the Council filed comments regarding DEEP's Sustainable, Transparent and Efficient Practices (STEPS) for Solar Development (attached). The Council's position regarding the development of solar resources in the state has not altered and DEEP should rely on those comments to help inform the development of the draft RFPs. However, the Council notes that the previously filed comments could apply to other electricity generation resources and wishes to highlight the following key points:

- The predictable and efficient development of electricity generation projects throughout the state should not equate to limiting the review of proposals and of their potential environmental impacts.
- The avoidance of adverse impacts to environmental, agricultural, cultural, and natural resources should be a priority for energy development.
- There should be preferential siting criteria that takes into consideration environmental factors including but not limited to natural resources and habitats, water quality and quantity, topography, equity, and degree of development.
- There should be preferential locations and applications including but not limited to roof/structure-mounted facilities and projects on previously developed land, such as landfills, brownfields, and parking areas, which would have limited impacts on environmental resources.
- There should be criteria to assess the proposed project for consistency with local laws concerning zoning, the environment and/or public health and safety.
- The siting criteria should be weighted to strongly discourage conversion of prime farmland, core forests, critical habitat, etc. for energy production.

Thank you for considering these comments.

Sincerely

Paul Aresta
Executive Director