



Connecticut Department of Energy & Environmental Protection  
Office of Climate Planning  
79 Elm Street  
Hartford, CT 06106-5127  
Via email: [deep.climatechange@ct.gov](mailto:deep.climatechange@ct.gov)

Thank you for the opportunity to submit comments on the Governor's Council on Climate Change (GC3) Working Group Draft Reports.

In September 2019, Governor Lamont issued Executive Order #3 to bring Connecticut to a 100% zero-carbon electric grid by 2040 and reinstate the GC3. At that time, CTLCV strongly recommended that the GC3 be composed of a diverse group of stakeholders, including, but not limited to: local and statewide lawmakers, community leaders, climate scientists, economists, labor representatives, and business leaders. In particular, the GC3 should include representatives from marginalized and disenfranchised communities. We are happy to see that the GC3 was able to incorporate voices from various backgrounds.

Please consider CTLCV's specific comments and recommendations below for the report as a whole and the various working groups.

1. Connecticut needs to set a goal of **100% zero-emission** electricity, transportation, and buildings that focuses on equity and creates good jobs for low-income and BIPOC communities.
2. Suspend any further approvals for the 650 MW **Killingly fossil fuel** power plant. Connecticut does not need the energy that this plant would produce. Investing in sustainable and carbon-neutral energy resources will yield both profit and lasting energy resources for far more decades than fracking can provide, and will aid Connecticut in the fight against climate change, inequity, and pollution.
3. Connecticut needs to reform or replace the **ISO-New England** market system. At this time, the grid is not taking into account the clean energy goals that we have worked so hard as a State to progress. If we are going to have a 100% zero-carbon electric grid by 2040, our outdated grid operator needs to share in that goal.
4. **Prioritize equity** in all aspects of the GC3 working groups reports.

5. Action on climate change can start now. We should not wait on final reports to act if the **science is already sound**.

We have reviewed and considered all of the reports and strongly support many of the recommendations. Based on our review, we would like to highlight specific recommendations that are particularly important.

## **WORKING AND NATURAL LANDS**

While we were thrilled to see the focus on working and natural lands in mitigating climate change, we realize there is some overlap between the subcommittees and some confusion as to what each subcommittee was responsible for. Going forward, we would like to see a crossover group for the entire ecosystem to create comprehensive legislation that takes into account recommendations from each subcommittee. Additionally, clarification for which subcommittee Long Island Sound falls under would be beneficial.

### **FORESTS**

CTL CV supports the emphasis on trees and forests in mitigating climate change impacts and in sequestering carbon. In order to protect and encourage forest growth, we are recommending major policy initiatives are pushed forward.

1. Establish a “No Net Loss of Forests” policy as in Maryland to increase forest cover and canopy where needed, avoid losses or conversion of forest, protect and steward resilient forests, mitigate “permitted” loss of forests/trees, and monitor for forests/tree resiliency.
2. It is critical to invest in planting and stewarding trees (as well as open spaces/parks, and community gardens) in our major cities to reduce “heat islands”, improve air quality, create job opportunities for BIPOC youth, and benefit the health of our most vulnerable communities who are already being disproportionately impacted by climate change and COVID-19.
3. It will take funding to make a difference on climate change and we must be willing to invest in natural climate solutions that work and are generally less expensive than most other infrastructure concepts.
4. Biomass must not be considered a Class 1 renewable energy.

### **WETLANDS**

Wetlands are an integral part of Connecticut’s climate change mitigation strategy. As natural carbon sinks, wetlands need to be protected and nurtured to provide adequate carbon sequestration measures. Additionally, wetlands provide barriers to increased storm surges and habitat to critical species to preserve biodiversity and act as indicators for healthy waters. In order to protect these critical ecosystems, there are significant policy

recommendations that we would like to see pushed forward in the 2021 legislative session.

1. Protect and enhance the ecosystem services value of wetlands using sound science and adaptive management strategies. Protecting our coastlines and tidal wetlands is a wise and data-based solution if we want to protect ecosystem services. Inland and tidal wetlands provide all the ecosystem services, from food and freshwater to carbon sequestration, to water filtration, habitat, and recreation.
2. Encourage and expand research on conservation efforts. Provide funding to revise the FIRM maps to include updated precipitation data and alterations in the landscape from changing flood zones.
3. Revise the Tidal Wetland Act and the Inland Wetland and Tidal Courses Act to include language stating that wetlands provide flood protection and carbon sequestration. Review the language of the Tidal Wetland Act to include preservation of near-shore soils known as subaqueous soil.
4. Review the impacts on affordable housing in legislation that incentivizes development in flood hazard areas, essentially bringing low income families to the hazard. We need to ensure that our policies moving forward are equitable as to not further burden already overburdened communities.
5. Reevaluate CT's Green Plan and open space grant programs to prioritize broader acquisition of land and conservation easements for ecosystem services most at risk from climate change.
6. Ensure that the GC3 wetlands policy recommendations are aligned with the State Water Plan goals.

## **AGRICULTURE AND SOILS**

While agriculture is a major player in soil health, we need to understand that soils are all around us. Soil health is not just a factor in the agriculture industry, but also relates to infrastructure of impervious surfaces, sewers, wetland soil, and more. Future policies should reflect the big picture of soil health and not only focus on soils relating to agricultural land. There is limited information listed in Connecticut statutes specifically about soil health. Healthy soils resolve a multitude of wrongdoings including water quality and carbon sequestration. Below are policy recommendations referring specifically to soils.

1. Connecticut needs specific legislation to change the definition of "Soil Health".
2. Change the Soil and Water Conservation Act legislation to include Soil Health, not just erosion.

3. A statewide fund needs to be developed to encourage farmers to do Best Management Practices when it comes to soil health and local foods.
4. Encourage programs to invest in composting and anaerobic digestion to synthesize methane and invest in local economies selling organic fertilizers.

## **RIVERS**

Rivers are a key factor in combating climate change, and Connecticut's rivers have the potential to provide strong climate change mitigation. Healthy waters lead to healthy communities and a healthy economy. However, the changing precipitation patterns, combined with warmer temperatures put our waters at a significant risk to adverse climate change impacts. Although some progress has been made, we must continue to take action to ensure the quality and quantity of our rivers and streams to meet our future resource needs. Below are some specific policy recommendations going forward:

1. Strong water conservation policies are critical to mitigate the impacts of drought due to climate change.
2. Employ and mainstream nature-based climate solutions that are inexpensive and based on science-driven processes.
3. Protect high-quality upland tributaries to keep healthy temperatures in our rivers and streams.
4. Invest in stormwater management programs to decrease pollution from runoff.
5. Re-establish connectivity of rivers. Invest in culverts based on increased precipitation to allow streams to continue to flow during storm events.
6. There is a need to invest in wastewater infrastructure to maintain the level of investments in the Clean Water Fund and take the burden off of ratepayers.
7. Develop more comprehensive programs for invasive species management.

## **PROGRESS ON MITIGATION STRATEGIES**

Connecticut has made substantial progress on employing strategies to mitigate climate change impacts. We support the focus that the Mitigation group put on equity and environmental justice. CTLCV focused specifically on the recommendations of four subcommittees, including Buildings, Electricity, Transportation, and Cross-Sector:

## **CROSS-SECTOR**

There are overlapping strategies we must use to fully transition from a fossil fuel economy to a green economy.

1. Strengthen the alignment between State decision making and GHG reduction goals.
2. Implement a price on carbon in the transportation and buildings sectors.

## **BUILDINGS**

The building sector is one of the largest contributors to GHG emissions and rising temperatures due to the creation of “heat islands” in cities. CTLCV would like to emphasize the following recommendations to improve sustainability in the building sector.

1. Allocate funds to remediate unhealthy homes which would then allow for Energy Efficiency upgrades. This is especially important in low-income and environmental justice communities.
2. Develop a strategic plan for transitioning from fossil fuels to renewable thermal technology, including electric heat pumps. Biofuels/Biomass should not be considered renewable thermal technology.
3. Expand consumer education and awareness to increase public demand for zero and low carbon technologies. In order to expand use of renewable energy technology, consumers need to first understand what the technology is.
4. Set clear end-dates for the expansion and new infrastructure of fossil fuels.
5. Create energy saving building codes including stretch codes, carbon codes, and all-electric options. Improving our building codes and standards will ensure that new buildings are sustainable, cost-effective in the long-term, and equitable for both the health and vitality of people and the planet.

## **ELECTRICITY**

Connecticut will continue to become more and more reliant on our electric grid as we transition away from fossil fuels. Therefore, we need to have enough energy, storage and grid technology to support our growing demand. CTLCV recommends:

1. Establish clear targets for offshore wind procurement to foster its significant potential to help meet zero carbon goals and work regionally with our New England neighbors to increase purchasing power.
2. Plan specific and achievable pathways for students in technical high schools, and for people living in areas where new electric infrastructure will be built, that lead to good paying “green” jobs.

3. Commit at least 50 MW of demand reduction per year to the ISO-New England market and ensure that ratepayers do not have to repay that deficit in the next billing cycle.

## **TRANSPORTATION**

The transportation sector is the leading cause of GHG emissions in our State, so it is the first place we must look to combat our climate crisis. We support many of the recommendations in the Transportation report, and recommend these additions:

1. Establish Statewide goals for zero-emission medium and heavy-duty trucks and for school transportation.
2. All proceeds from the State's GHG emissions-reduction vehicle registration fee should be allocated to CHEAPR, and additional incentives for the low income market.
3. Sign onto the Transportation and Climate Initiative to reduce carbon emissions in the transportation sector and allow for complementary policies to promote public transportation, active transportation, electric vehicles and more.

## **INFRASTRUCTURE AND LAND USE ADAPTATION**

Many of the core recommendations for the Infrastructure and Land Use working group have been addressed in other sections of the GC3 reports. Our main recommendation for this report is to improve the ability of efficiency programs to overcome health, safety, and legal barriers (also stated in the Mitigation report and Buildings subcommittee). This will address equity issues while also aligning the State's climate goals:

1. Establish an Energy Efficiency and Healthy Homes (EEHH) equity fund.
2. Siting decision for clean energy infrastructure should Incentivize and prioritize redevelopment of previously used sites within established neighborhoods, i.e. Brownfields, abandoned lots, and not on prime forest or farmland.
3. Require that all utilities consider all projected climate change impacts in their planning and ensure they are consistent with state climate plan goals.

## **PUBLIC HEALTH AND SAFETY**

As climate impacts bear down on Connecticut and are only projected to get worse, unless we seriously start to alter our behavior, we need to plan for the public health and safety of our residents. CTLCV supports all the recommendations in the Public Health and Safety report, and would like to draw particular attention to the below recommendations:

1. Enact policies to protect low-income residents and renters, particularly those in government-supported housing, from indoor heat exposure.

2. Enact policies to protect residents in vulnerable communities located in flood plains.
3. An energy audit program needs to be developed for the water industry to reduce consumption, conserve resources, increase energy efficiency, and reduce greenhouse gas emissions.
4. Include a resiliency and a climate assessment for all new legislation to show how each policy will impact climate change and align with our climate goals.

## **FINANCING ADAPTATION AND RESILIENCE**

Many of the goals of the Financing Adaptation and Resilience working group are addressed in other reports. A main goal for this group would be to:

1. Establish a carbon fee to provide a revenue source for resilience and adaptation funding. Funding for climate mitigation and adaptation should be provided by the root cause of climate issues.
2. Approve legislation to allow individual municipalities Statewide to form stormwater utilities to fund resilient infrastructure.

## **SCIENCE AND TECHNOLOGY**

In order to adequately and rapidly mitigate climate change, we need to rely on and develop sound science. Connecticut needs to employ the best science and technology practices to preserve our wildlife and ecosystems, clean air and water, and protect public health. The below suggestions are examples of “multi-solving”, programs that would help mitigate climate change while providing benefits to public health, recreation, transportation, wildlife health and more. CTLCV supports the recommendations of the Science and Technology working group, with special attention to the following:

1. Remove biomass facilities from the list of Class 1 Renewable Energy Sources in the CT Renewable Portfolio Standards.
2. Prioritize “proforestation” and natural area preserves on public land and ensure that old growth forests are protected in order to protect native species and maximize carbon accumulation, fight climate change, and protect public health.
3. Protect Keystone Species on land and water as an essential part of ecosystem integrity.
4. Ensure that all communities, especially low income and BIPOC, have access to clean and safe nature preserves.
5. Invest in reliable and safe people-powered (walking and biking) and public transportation.
6. Develop local systems for resource and food distribution to reduce fossil fuel usage and create a plan to deal with unknown and unpredictable disruptions.

7. Invest in research and landscape level planning to prioritize climate change mitigation programs in areas that are affected by multiple environmental issues (i.e. flooding, heat island effect).
8. Prioritize depaving of impervious surfaces to protect water quality of lakes, rivers and streams.

## **EQUITY AND ENVIRONMENTAL JUSTICE**

Connecticut has made a lot of progress on equity and environmental justice in recent years. CTLCV supports the recommendations of the Equity and Environmental Justice working group, with particular consideration made to the following policies:

1. Support the recommendations of the Public Participation subcommittee.
2. Development of a statewide environmental justice mapping tool that provides a visual illustration of vulnerable communities across Connecticut.
3. Develop stricter regulations on permits for installation and construction.

As stated, we encourage DEEP and the Governor's Office to take all the recommendations of the GC3 into consideration when planning for climate change mitigation and adaptation. Thank you for the opportunity to submit comments on the draft working group reports.

Sincerely,

### **Emily Alexander**

Climate Policy Advocate

Connecticut League of Conservation Voters

533 Farmington Ave, Suite 201

Hartford, CT 06105

860.236.5442

[emily.alexander@ctlcv.org](mailto:emily.alexander@ctlcv.org)

[www.ctlcv.org](http://www.ctlcv.org)