

# 20 BY 20 RESULTS



SPRING 2020

## 20 GOALS

aimed at increasing **predictability**,  
**efficiency**, and **transparency** of  
DEEP's regulatory processes

**TO MEET IN 2020**



SPRING 2020

# Commissioner's Letter

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Dear Friends,

This third 20BY20 quarterly update has a different focus. At the time of this update, we are in the midst of the COVID-19 pandemic public health emergency. This unprecedented event has reshaped how DEEP - and the businesses, organizations, and stakeholders we serve - work together.

DEEP has responded to the pandemic with the same spirit of innovation, urgency, and transparency that we have brought to the 20BY20 effort. While our focus on pandemic response has necessarily interrupted or delayed progress on some of our 20BY20 targets, much of the work continues, albeit remotely. This report also includes additional detail on some of the many ways DEEP has adapted the way that we work, and the work that we do, to respond to the needs of communities, businesses, and regulated entities during this challenging time. In many cases, we are adopting more efficient practices that will create long-term improvements. This report details that progression.

I am so thankful for the resilience and ingenuity of our staff in continuing to deliver key services during the present crisis - and for the flexibility, patience, and partnership of so many advocates, businesses, and individuals as we work together to carry out DEEP's mission and prioritize economic recovery and human health during this difficult period.

Sincerely,



**KATIE DYKES**  
DEEP COMMISSIONER

# Maintaining Environmental Protection

In early March 2020, at the start of the public health emergency, fewer than 75 DEEP employees were approved for telework, on a part-time, voluntary basis. DEEP managers inventoried every job function and identified over 670 positions with duties that could be performed fully or partially remotely. Within a week, over 80 percent of DEEP's workforce was equipped to work remotely, including the entire Environmental Quality branch except emergency responders. This major logistical undertaking highlighted the great work of DEEP's Information Technology and Human Resources teams, as well as innovation across the entire agency.

DEEP implemented E-signature and digital routing protocols in a matter of days. Staff migrated to digital platforms for meetings and collaboration. Meanwhile, our field-based staff, including scientists, maintainers, and emergency responders, have continued their important work with new safety measures in place. Collectively, these changes ensured that the majority of DEEP's services and programs could be carried out with minimal interruption.

These and other measures have mitigated on-the-job exposure to the greatest extent possible, and set a high bar for public and worker safety. While these measures cannot eliminate all risk of exposure, our staff report that they have confidence in their ability to stay safe and continue their work.

During this time, DEEP has responded quickly to provide guidance and regulatory flexibility for regulated entities where appropriate. IT investments and process improvements made through 20BY20 and earlier process improvement initiatives paid dividends as DEEP staff and stakeholders adapted to remote work. For example, while DEEP's records center at 79 Elm Street was closed to the public, the digitization of Hazardous Waste Manifests (20BY20 Goal 14) ensured that members of the public would have uninterrupted access to those documents through DEEP's Document Online Search Portal. DEEP has compiled all [COVID-19 operational changes](#) onto our website.



## DEEP COVID-19 Response



An important priority during the crisis has been to maintain regular communication with all stakeholders. Throughout the spring, DEEP held regular discussions with business organizations, waste service providers, electric utilities, energy efficiency contractors, outdoor recreation providers, Cities and Towns, and environmental advocates. Intergovernmental coordination has never been more important - DEEP is an active participant in the Connecticut Incident Command Structure, and actively connects with environmental leaders from New England and New York, as well as EPA Region 1, to discuss regional approaches to environmental challenges.

In addition, DEEP has engaged in opportunities to establish innovative, valuable partnerships in the outdoor recreation space (20BY20 Goal 18). The enhanced services include coordinated social media messaging with Connecticut Outdoor Recreation Alliance and others to highlight social distancing practices; sharing safety protocols and coordination with local land trusts; and creation of the “WhatsOpenOutdoors” website to provide a one-stop shop for both state and municipal beach closure information.

## Supporting Our Economic Recovery

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The goals of 20BY20 are more relevant than ever before – but sometimes more difficult to meet in the current crisis. Since March, our staff have continued to work on 20BY20 priorities, the regular business of the agency, plus new assignments with COVID-19 response. Consequently, milestones for some 20BY20 goals have encountered challenges.

We are detailing in this report areas where we have made continued progress in 20BY20 goals for this quarter, and will provide an update for every 20BY20 goal in the subsequent quarter. With concerted focus from program managers and staff, DEEP is proud to report on our progress on key 20BY20 goals.

## Maintaining Environmental Protection

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DEEP is committed to supporting the state’s economic recovery through continued progress on 20BY20 goals and other actions as necessary. Our staff are working hard to ensure that permitting processes continue with minimal interruption, continuing to provide pre-application assistance, and making operational changes to enable compliance with reporting requirements and other standards. This past quarter, DEEP launched the **Permit Concierge Team** to create a case-management approach for complex projects – more on that later in the report.

## Progress on Predictability, Efficiency, and Transparency

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# Predictability

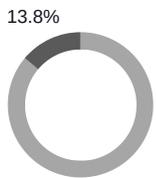
DEEP's regulatory processes should follow predictable rules and schedules so that businesses and other stakeholders know what to expect.

## GOAL 1: MAKE PERMITTING TIMEFRAMES MORE TRANSPARENT

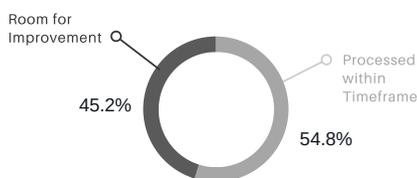
[View DEEP's Permitting Timeframes](#)

### Baseline

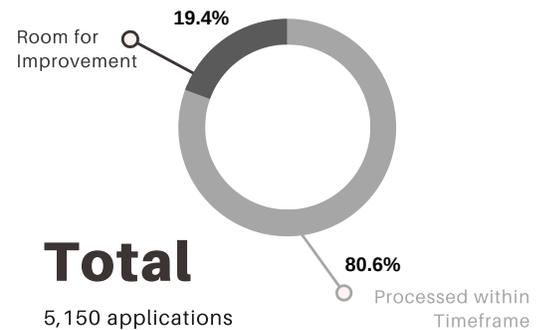
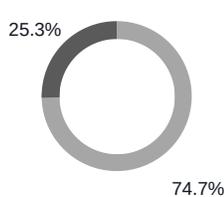
**3 Month**  
4153 applications in this category in the past 32 months



**6 Month**  
922 applications in this category in the past 32 months

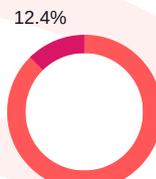


**12 Month**  
75 applications in this category in the past 32 months



### This Quarter

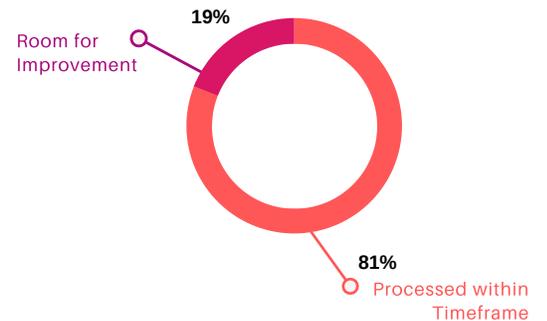
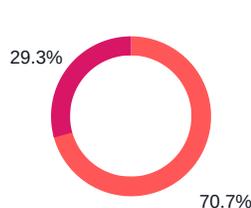
**3 Month**  
5,155 applications in this category in the past 40 months



**6 Month**  
1,208 applications in this category in the past 40 months

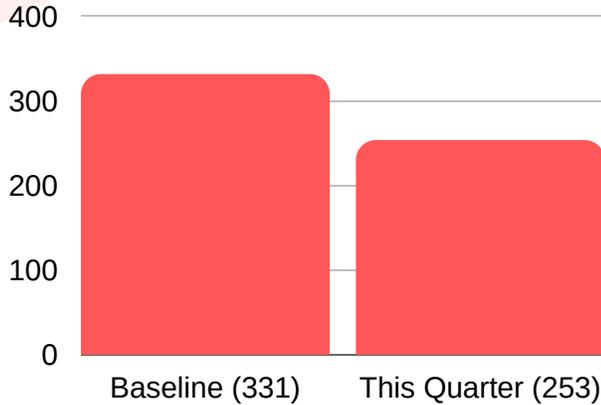


**12 Month**  
99 applications in this category in the past 40 months



## GOAL 3: REDUCE NUMBER OF LEGACY PERMIT APPLICATIONS PENDING

### Legacy Permit Applications Pending

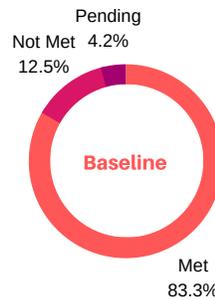


**18 apps**  
processed this quarter

## GOAL 4: REDUCE TIME FOR TRANSFER ACT AUDITS

Percent of filings receiving an audit/no audit decision

**within 90 days**



## GOAL 5: FINALIZE RSR AND EUR REGULATIONS

DEEP will complete the review of all public comments received in response to the draft Remediation Standards Regulations (RSRs) and Environmental Use Restrictions (EUR) by mid-June. At this point, the two regulation packages will move to the next step in the formal review process.

### RSRs

Currently at Attorney General's Review Stage



### EURs

Currently at Attorney General's Review Stage



## GOAL 8: ELIMINATE SOME PERMITS AND MOVE TO "PERMIT BY RULE"

The proposed air quality regulation concerning limitations on premises-wide actual emissions below Title V source thresholds convert the General Permit to Limit Potential Emissions (GPLPE) into a regulation. This effort will reduce costs to businesses by eliminating costs associated with developing and submitting permit applications. By eliminating the need to process GPLPE applications requiring technical reviews while achieving the same level of environmental protection afforded by the current GPLPE, DEEP will be able to utilize the additional staff time towards improving permit processing times and more efficiencies.

This quarter the proposed regulations were revised after public comments and were submitted to the Legislative Regulations Review Committee for consideration this summer.

### Conversion of General Permit to Limit Potential Emissions

Currently at Regulation Review Committee Agenda Stage

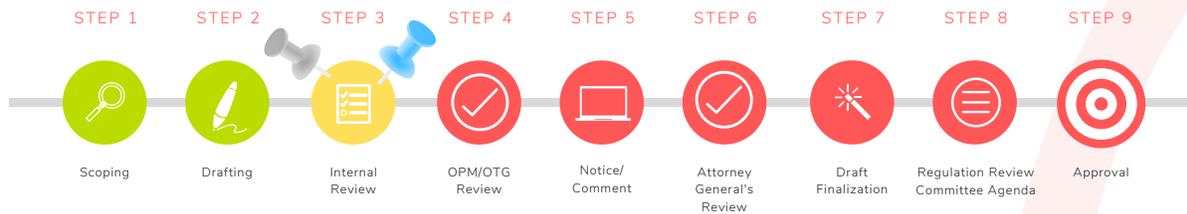


# GOAL 20: UPDATE SPILL-REPORTING REGULATIONS

This summer DEEP staff will initiate a focused engagement with stakeholders on key issues that the draft proposed regulations will address, in advance of issuing a draft for public comment.

## Spill Reporting

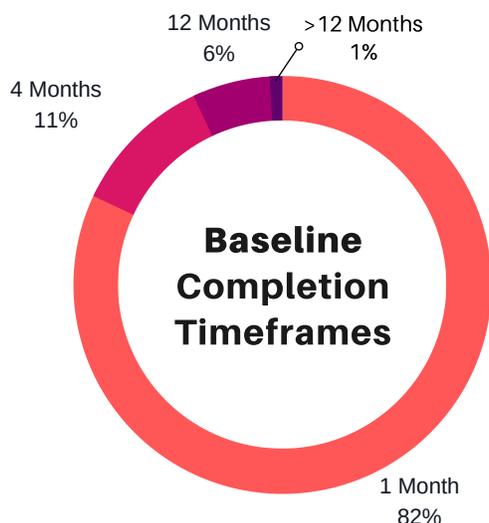
Currently at Internal Review Stage



## Efficiency

DEEP's ability to conduct its various review processes with efficiency is important for the state's economic recovery and growth.

# GOAL 9: SIMPLIFY NATURAL DIVERSITY DATA BASE DETERMINATIONS



In this spring report, DEEP is introducing for the first time baseline data for the Natural Diversity Data Base (NDDDB) program. Within the past year, the NDDDB program received more than 1,000 requests for environmental reviews to determine the impact of proposed projects on both federal and state listed species, with 82% being closed within a one month timeframe.

**2019 Baseline Review Status** - closed 94% of the reviews with 4% pending for additional information and 2% pending for review.

## Development of the NDDB Portal

Currently at Testing Stage



To help reduce the time it takes to complete the initial NDDB screening through the development of a self-serve user portal, this quarter, DEEP continues the testing stage of the self-serve portal.

## GOAL 10: INCREASE EFFICIENCY OF GRANT ADMINISTRATION

To assist DEEP's goal to reduce the amount of time it takes to arrive at an executed contract, DEEP has obtained approval to hire a staff attorney who will add much needed support to increase efficiency of grant administration. This position has been posted on CT's Department of Administration Services electronic Job Application website.

### **Note on Process Improvement:** **Environmental Lean Management System (ELMS) Visual Management**

Last quarter, EPA Region I staff conducted two days of training with managers and staff associated with four pilot projects for ELMS visual management training. DEEP staff were introduced to a visual management process improvement tools that can be integrated into their daily work and ongoing project management efforts. This effort will build upon DEEP's strong LEAN/process improvement foundation and past efforts.



Efficiency

These tools will provide for essential information and knowledge transfer, a fundamental of our succession planning. In addition, these tools will support ongoing streamlining efforts. Four pilot teams from across air, water, materials management and natural resource programs will put into practice these new tools including weekly huddles and visual tracking systems. With the COVID-19, staff are rethinking how to adapt and utilize these tools in a virtual and telework environment.

# Transparency

*Businesses, members of the public, and the mission of environmental protection benefit from readily accessible information.*

## GOAL 2: ENHANCE PRE-APPLICATION ASSISTANCE

Ninety-eight percent of applicants left pre-application meetings with an improved understanding of the environmental permits that are applicable to their projects.

### Baseline

96% of applicants reported their experience as "good," or "excellent" **within last 12 months**

### This Quarter

98% of applicants reported their experience as "good," or "excellent" **within last 4 months**

## GOAL 12: ESTABLISH PERMITTING CONCIERGE FUNCTION

This quarter DEEP launched the Permitting Concierge Team with outreach to organizations such as the CT Business and Industry Association (CBIA), the New England Environmental Business Council, environmental advocates as well as engagement with DEEP managers and staff.

The Permit Concierge Team provides a single point-of-contact for environmental permitting assistance. The Concierge Team will facilitate communication between DEEP's stakeholders and the permitting programs. The team will guide complex projects through the permitting process to meet optimal timeframes. This service is intended for projects that may involve multiple permits and coordination with other state agencies, such as projects involving economic recovery during/after COVID-19 and those that support economic development. The team can be contacted at DEEP.Concierge@ct.gov and [information can be found here](#).



# 20 BY 20

[WWW.CT.GOV/DEEP/20BY20](http://WWW.CT.GOV/DEEP/20BY20)

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