20BY20 RESULTS

FINAL 20BY20
JANUARY 2021

20 GOALS TO MEET IN 2020
Aimed at increasing predictability, efficiency, and transparency of DEEP's regulatory processes.

WWW.CT.GOV/DEEP/20BY20
20BY20@CT.GOV

CONNECTICUT ENERGY ENVIRONMENT

Commissioner's Letter

Dear Friends,

DEEP launched the 20BY20 initiative in June 2019, as an effort to share our commitment to transparent, efficient, and predictable regulatory processes with the people we serve. We identified 20 goals (including four selected with your input) and committed to not only achieve them, but to share our progress with the public, as a way to enlist your support in our effort, and also to spur discussion and engagement about the opportunities to improve our regulatory process and environmental outcomes.

We could not have predicted, of course, a global pandemic that would alter our work environment and priority assignments. Nor could we have anticipated how the events of 2020—a public health emergency, economic downturn, and a renewed focus on racial justice—would add new urgency and importance to many of our 20BY20 goals, such as expanding digitization and online document access, and enacting broad reforms of Connecticut's cleanup framework for contaminated sites.

I am proud to present DEEP's 20BY20 RESULTS: final 2020. We have successfully achieved nearly 80% of our goals, while demonstrating a high or moderate rate of progress on the remaining 20%.

80% ACHIEVED!

We launch into 2021 with renewed dedication and responsiveness to environmental protection, economic recovery and growth; equity and environmental justice; and climate mitigation and resilience needs and challenges. While tackling the challenges of the COVID-19 pandemic for most of 2020, DEEP focused on adapting the way we work to continue to make our regulatory processes more transparent, efficient and predictable.

As we look ahead into 2021, our focus will be on institutionalizing the best practices from our 20BY20 effort, to enhance the transparency, predictability, and efficiency of DEEP's processes and mission on a permanent basis. We will continue to seek your input on our strategic agenda and to report on DEEP's performance and progress. Transparency in areas such as permit timeframes, regulation development, compliance trends, electronic processes and digitization of documents will continue.

I am incredibly thankful for the dedication and commitment of DEEP staff towards achieving the 20BY20 goals and the important collaboration and work we have executed with our many partners – businesses, environmental organizations, individuals, other state agencies and municipalities. I look forward to continuing our hard, rewarding work and embracing our challenges together.

Sincerely,

KATIE DYKES, DEEP COMMISSIONER

GOAL 1: MAKE PERMITTING TIMEFRAMES MORE TRANSPARENT ✓

This quarter, consistent with the previous quarters in 2020, **DEEP processed an overall 80 percent of applications within the expected timeframes.** During each of those quarters, **DEEP received approximately 1,000 applications and processed over 90 percent of applications.**

DEEP's performance in the 3-month category remains strong this quarter at over 87 percent, which is consistent throughout the 2020 quarters. We have room for improvement in the 6 month category. In 2021, this will be an area targeted for process improvement opportunities and resource or priority adjustments to increase the percentage of permits issued within the expected timeframes.

Baseline

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

13.8%
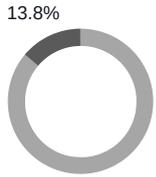
86.2%

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

Room for Improvement

Processed within Timeframe
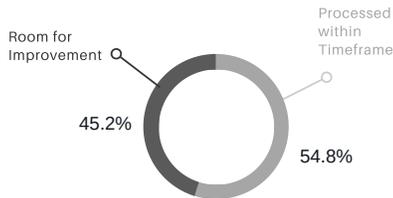
45.2%

54.8%

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

25.3%

74.7%

Room for Improvement

19.4%
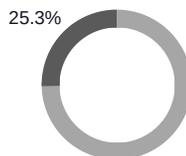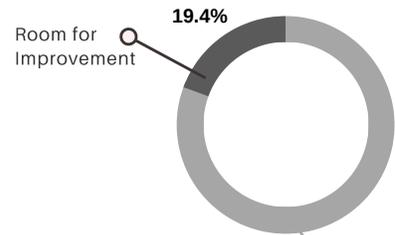
Total
5,150 applications

80.6%
Processed within Timeframe

This Quarter

3 Month
6,086 applications in this category in the past 48 months

13%
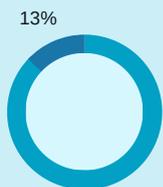
87%

6 Month
1,501 applications in this category in the past 48 months

Room for Improvement

Processed within Timeframe

50%

50%

12 Month
132 applications in this category in the past 48 months

35%

65%

Room for Improvement

20%
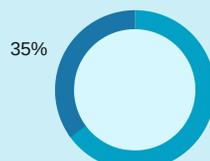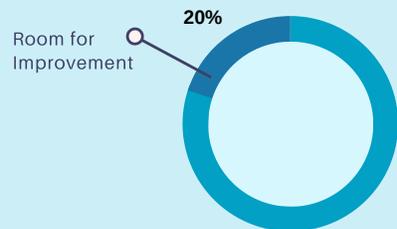
Total
Out of 8,229 Applications
7,719 applications processed

80%
Processed within Timeframe

Predictability

As a result of this 20BY20 initiative, the public could see the expected timeframes for every type of permit DEEP issues – which is more than 125 permit types. The types of permits DEEP issues are categorized into four different **Permitting Timeframes** – immediate or within 3, 6 or 12 months – based upon the following four criteria: extent of DEEP review; public notice needs; level of potential risk to the environment; and technical complexity.

In 2021, DEEP will strive to increase the transparency on the percentage of permits issued within the expected timeframes by providing more refined information on the many different permitting categories through an online dashboard, updated on a quarterly basis. This type of more specific data is relied upon by DEEP staff to identify areas where process improvement, innovation or additional resources may be necessary and to strategize on the approaches and tools necessary to achieve our goals.

GOAL 2: ENHANCE PRE-APPLICATION ASSISTANCE ✅

Despite the public health emergency for most of 2020, DEEP maintained an active online remote pre-application assistance program for entities requiring environmental permits. Exceeding the **statutory requirement**, **DEEP met requests for pre-application meetings 100 percent of the time in a timely manner.** By statute, DEEP is to respond within 10 days and hold a meeting within 30 days. DEEP's best management practice that is attained most often is to respond within 48 hours and hold a meeting within 2 weeks. Permit pre-application meetings connect businesses to DEEP staff with appropriate regulatory expertise to provide answers on permitting requirements, estimated timelines and necessary DEEP contacts. This level of responsiveness is vital for supporting strong economic recovery and growth opportunities while protecting our natural environment. In 2020, DEEP held a total of 69 multi-media program pre-application meetings – an increase of 40% over 2019. All meetings in the last three quarters were held online.

Baseline (2019)
96% of applicants reporting their experience as "good," or "excellent"

Each Quarter (2020)
97% of applicants continue to report their experience as "good," or "excellent"

"Everyone I dealt with at CT DEEP was extremely helpful and attentive, which is amazing during this tough time of everyone working from home during the Covid-19 crisis."

It is easy to schedule a permit pre-application meeting using a **short questionnaire**. The responses by the applicant help us ensure we have all the correct regulatory technical expertise in the meeting. We want to see that number stay high, and make continuous improvements to how we communicate throughout the permitting process. We encourage applicants to complete our survey so that we may continue to improve our process.

Predictability

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

In 2020, DEEP staff worked diligently across areas in need of attention with longstanding pending permit applications and **successfully reduced the legacy permit applications pending by 45%.** Out of an initial **331 applications** pending with DEEP, **144 applications have been processed** ; **37 applications were processed during the fourth quarter of 2020**.

DEEP employed various strategies to address the legacy permits, including process improvements and enforcement responses. At the same time, DEEP staff continued to work in accordance with the timeframes of Goal 1 on new permit applications – overall 80 percent of applications were processed within expected timeframes.

Resolution of some of the legacy applications require enforcement responses. Specifically, a 2015 legacy application resulted in a consent order with the permit applicant to address several existing subsurface disposal systems on the property that had previously been subject to local jurisdiction and were not covered/authorized by the legacy application. The order established a schedule for submission of a discharge permit application to include the discharges from other systems on site and systems assessments so that the department could holistically evaluate all of the systems on the site and ensure the adequacy and effectiveness of the systems to protect human health and the environment and to ensure that such systems would meet present and future wastewater treatment and disposal needs of the existing land use as a retail plaza.

Going forward, DEEP will continue to work with all stakeholders to reduce the legacy permits – some of which require statutory or regulatory revisions or long-term, complex solutions such as infrastructure needs. Most of the legacy applications fall within the longest expected permit timeframe based upon technical complexity, extensive review needed, public notice requirement and high potential risk to the environment.

Legacy Permit Applications:

Bar chart showing Legacy Permit Applications. Y-axis from 0 to 400 in increments of 100. "Initially Pending" bar at 331. "Processed" bar at 144.

Predictability
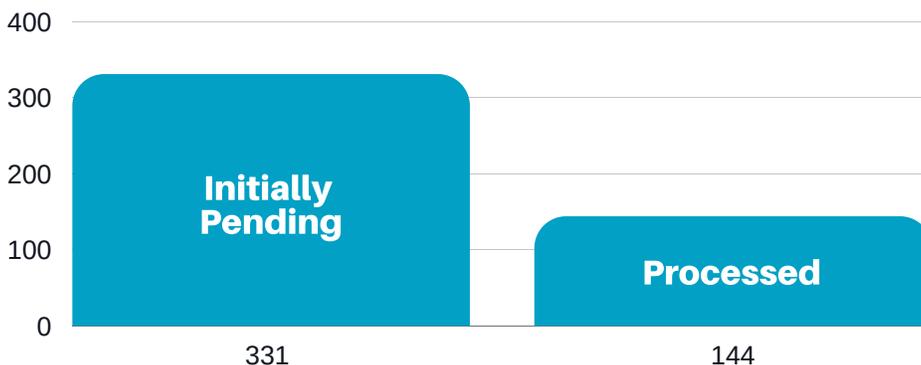
GOAL 4: REDUCE TIME FOR TRANSFER ACT AUDITS ✓

Percent of filings receiving an audit/no audit decision **within 90 days**

It is DEEP's goal to achieve this timeframe 100% of the time.

Pending 4.2%
Not Met 12.5%
Baseline
Met 83.3%

2020
Met 100%
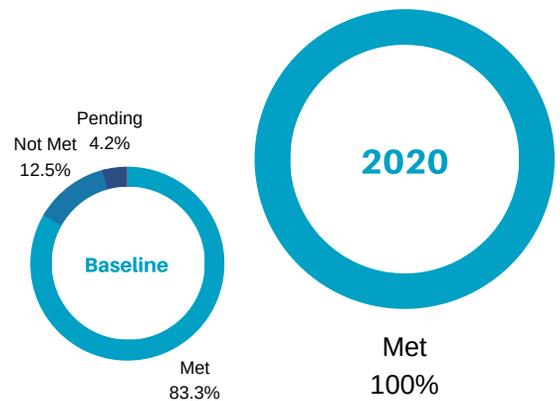
Connecticut's Property Transfer Act applies to properties with an elevated risk of environmental contamination at the time of sale. This framework is aimed at ensuring that legacy contamination is addressed at a time when parties may have the opportunity to address cleanup costs as part of a transaction. It is critical that the remediation process follows predictable timelines that are compatible with the dynamics of the commercial real estate market.

Property owners need certainty that remediation is complete, and that means they wait to hear from DEEP on whether an audit needs to be conducted. In many cases, an audit is not necessary and the project can be considered complete. Providing a timely decision will ensure greater certainty that can help facilitate property transfer and redevelopment, which in turn will ensure more sites are remediated. DEEP will continue to be transparent on audit timeframes as DEEP and the Department of Economic and Community Development work with stakeholders to receive input on regulations that will implement a new, release-based cleanup framework to replace the legacy Property Transfer Act. For more information about the release-based program, its process, and for engagement opportunities, please visit the **release-based webpage**.

GOAL 5: FINALIZE RSR AND EUR REGULATIONS ✓

This year, **DEEP successfully moved the Remediation Standards Regulations (RSRs) and the Environmental Use Restrictions (EURs)** through a rigorous public comment process, made necessary revisions to the regulations and sent the regulation packages to the next steps in the formal review process – to the Legislative Regulations Review Committee (LRRC) for their consideration and approval. LRRC approved the regulations at the January 2021 meeting.

RSRs set the options under which a site can be cleaned up. Regulations concerning EURs will allow the use of notices to be filed in land records rather than the process of complex Environmental Land Use Restrictions (ELURs) for some cleanup situations. Together, these regulations will ensure environmentally sound standards and greater efficiency of property transfer and redevelopment, a key part of supporting economic recovery while protecting the environment.

Predictability

RSRs
Approved January 2021

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5	STEP 6	STEP 7	STEP 8	STEP 9
Scoping	Drafting	Internal Review	OPM/OTG Review	Notice/Comment	Attorney General's Review	Draft Finalization	Regulation Review Committee Agenda	Approval

KEY

Baseline

Q4

EURs
Approved January 2021

| STEP 1	STEP 2	STEP 3	STEP 4	STEP 5	STEP 6	STEP 7	STEP 8	STEP 9
Scoping	Drafting	Internal Review	OPM/OTG Review	Notice/Comment	Attorney General's Review	Draft Finalization	Regulation Review Committee Agenda	Approval

GOAL 6: FAST TRACK SAME-TO-SAME PERMIT RENEWAL TIME ✅

In the fourth quarter of 2020, the revised new renewal form for solid waste permitting and the Standard Operating Procedure (SOP) were **successfully released** for use by permit applicants. These forms make it easier to process same-to-same or renewals without modifications. They were revised based upon feedback received from stakeholders in the second quarter of this year.

Average Renewal Time
for Individual Solid Waste Permits

BASELINE
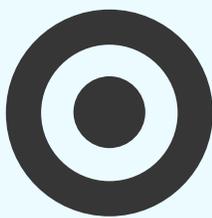
12 months

GOAL
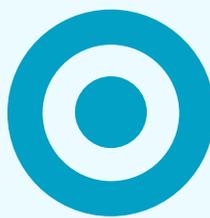
9 months

GOAL 7: CHANGE INDIVIDUAL PERMITS TO GENERAL PERMITS ✅

During the **last quarter of 2020, DEEP successfully issued** the proposed consolidated general permits for Significant Industrial Users (SIU General Permit) and for Miscellaneous Industrial Users (MIU General Permit). These general permits consolidate and streamline the regulation of thousands of industrial and commercial wastewater discharges to Publicly Owned Treatment Works (POTW) statewide.

## Development of MIU and SIU General Permit

Approved in September and October 2020

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5	STEP 6	STEP 7
Scoping	Drafting	Internal Review	Notice/ Comment	Mediation/ Public Hearing	Draft Finalization	Approval

KEY
Baseline
Q4

In the last quarter of 2020, further work on a new Aquatic Pesticides General Permit was temporarily reprioritized to provide for a focus on the development of online e-licensing programs for the registration of pesticide products and the certification of pesticide applicators. These online services will improve the efficiency of staff resources; provide greater convenience to applicators and product registrants; and help DEEP focus its resources on activities that may present greater risks to the environment. The online pesticide product registration system has been launched and +2000 registrations have been electronically processed. Data migration and reconciliation are underway for applicator licensing and business registrations. DEEP will continue to evaluate the efficiency of the general permit mechanism to authorize these pesticides. In 2021, while maintaining necessary environmental standards and requirements, DEEP will continue to explore opportunities to shift individual permits to general permits or to consolidate and streamline existing general permits where appropriate.

Development of Aquatic Pesticides General Permit

Currently at Internal Review Stage

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5	STEP 6	STEP 7
Scoping	Drafting	Internal Review	Notice/ Comment	Mediation/ Public Hearing	Draft Finalization	Approval

KEY
Baseline
Q4

Predictability

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

In the last quarter of 2020, the proposed air quality regulation concerning limitations on premises-wide actual emissions below a Title V source was approved by the Legislative Regulations Review Committee. **This regulation converts the General Permit to Limit Potential Emissions (GPLPE), which covers 200 sources, into a regulation that achieves the same level of environmental protection and reduces costs to businesses by eliminating the need for a permit application.** This simplifies compliance for regulated sources and lowers costs while providing additional DEEP staff time towards improving other processing times and more efficiencies.

Conversion of General Permit to Limit Potential Emissions

Approved September 2020

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5	STEP 6	STEP 7	STEP 8	STEP 9
Scoping	Drafting	Internal Review	OPM/OTG Review	Notice/ Comment	Draft Finalization	Attorney General's Review	Regulation Review Committee Agenda	Approval
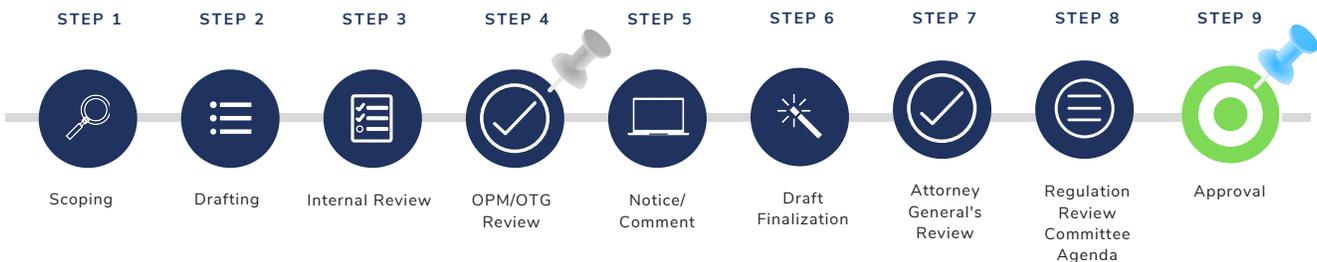
# GOAL 9: SIMPLIFY NATURAL DIVERSITY DATA BASE DETERMINATIONS

In the spring report of 20BY20, baseline data for the Natural Diversity Data Base (NDDB) was introduced. DEEP reported that within the past year, the NDDB program received more than 1,000 requests for environmental reviews with 82 percent being closed within a one month timeframe. These are requests to determine the impact of proposed projects on both federal and state listed species and to help landowners conserve the state's biodiversity.

Beginning in April 2020, DEEP assigned and tracked expected 1-, 4-, and 12-month turnaround timeframes (TAT) for processing NDDB requests based upon the type of species impacted and complexity of the requests. These timeframes operate similar to the timeframes established in Goal 1 for expected completion times for permit activities.

Processing occurring within assigned TAT

April - December 2020 NDDB Requests

1 Month
Assigned TAT = 1 month &
unassigned (n=441)

Overdue
6%

Processing within
assigned TAT 94%

4 Month
Assigned TAT = 4 months
(n=80)

Overdue
16%

Processing within
assigned TAT 84%

12 Month
Assigned TAT = 12 months
(n=32)

Overdue
0%

Processing within
assigned TAT 100%
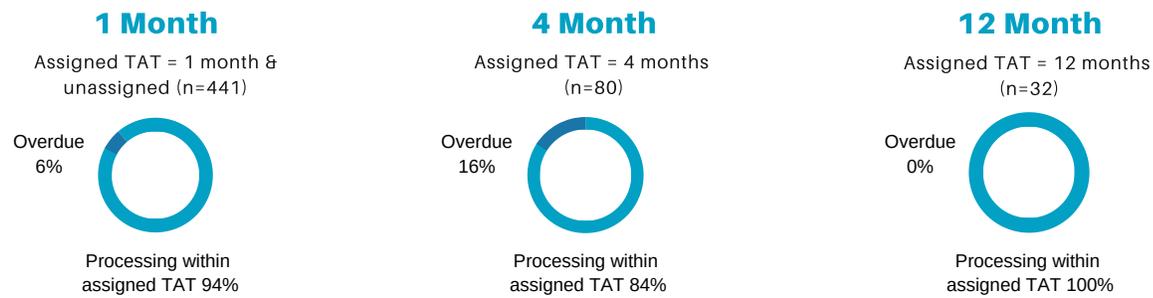
Development of the NDDB Portal

To help reduce the time it can take to complete the review process, DEEP has developed a self-serve user portal that provides instant responses for less complex projects. This automation should reduce the volume of requests biologists must review manually, providing staff with more time to focus on processing requests with higher levels of complexity.

DEEP's NDDB portal is scheduled to go live in early 2021. Development and testing of this new solution is complete. External stakeholders were offered a sneak-peak to the new system to provide some initial feedback. In preparation for go live, the environmental review layer and data are being updated to include the most up-to-date information. Prior to go live date, DEEP staff will provide our stakeholders with additional outreach and introduction to the new tool.

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5	STEP 6	STEP 7	KEY
Business Issues	Business Requirements	Design	Construction	Testing	Implementation	Post Implementation	Baseline / Q4
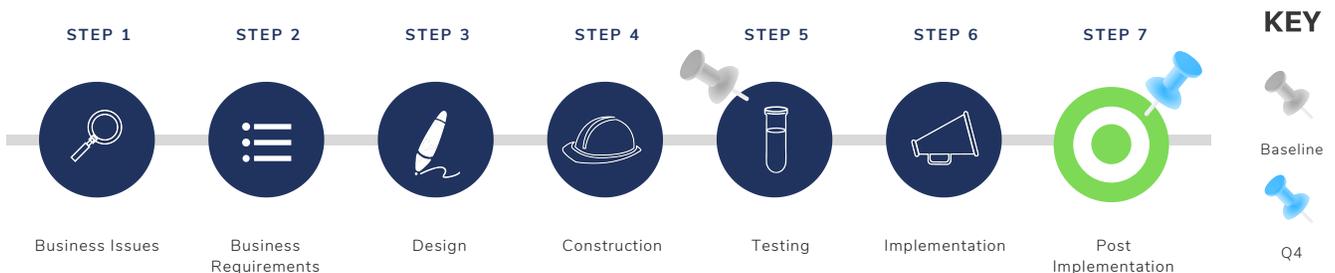
GOAL 10: INCREASE EFFICIENCY OF GRANT ADMINISTRATION

As the COVID-19 public health emergency continues, DEEP is accelerating electronic solutions such as e-signature and digital routing protocols into permanent, core business functions. Specifically, to assist with improved administration, tracking and processing time of outgoing grant and contracts for services, DEEP has embarked on the implementation and utilization of a formal electronic routing and signature tool – DocuSign. In 2021, DEEP will continue to develop and review Standard Operating Procedures (SOP) for e-routing grants and contracts through the necessary review and approval steps of DEEP as well as other agencies such as the Office of Attorney General and the Office of Policy and Management. The goal is to reduce the amount of time it takes to arrive at the execution of the over 500 contracts DEEP administers each year. Other 2021 DocuSign priorities for e-routing and signatures are for certain permits and enforcement tools.

Efficiency

GOAL 11: AGENCY-WIDE SUCCESSION PLANNING

In the last quarter of 2020, as part of DEEP's agency-wide succession planning and evaluation of the impacts of attrition on our programs, DEEP participated in a statewide interagency initiative. Connecticut state agencies face common 2022 staff retirements projections. For this reason, there are critical areas across agencies where optimizing and leveraging statewide solutions makes sense. More specifically, areas such as electronic processing; digitization of documents; regulatory streamlining; and asset management of facilities may be fruitful. The Department of Administrative Services (DAS) and Office of Policy and Management (OPM) staff are coordinating and examining these issues across state agencies. A report with statewide recommendations is expected in early 2021.

GOAL 12: ESTABLISH PERMITTING CONCIERGE FUNCTION ✅

This year, **DEEP launched a new Permitting Concierge Service** to provide enhanced support for businesses navigating through environmental approval processes and to contribute to the state's efforts to promote economic recovery and growth. The Service is intended for complex projects that involve multiple permits and coordination with other state, municipal and federal agencies. Assistance with the predictability and transparent sequencing of permits for facilities and sites provides for more effective delivery of timely, quality permits.

During the last quarter of 2020, the team strengthened efforts to develop outreach and permit assistance tools such as sector focus fact sheets (Information for **Solar** and **Offshore Wind** Developers) that identify the various types of permits needed and a **brochure** including updates of permit success stories that will continue throughout next year. In 2021, DEEP's permit assistance website will be updated to provide easier access to essential information on permitting requirements and forms. The Concierge Team has also made 13 presentations to external and internal stakeholders, giving an overview of the Concierge Service and seeking feedback on its development. In line with our commitment to process improvements, we have also completed benchmarking research with 11 states in our region and across the country. Further development of our Concierge and permit assistance services and website in the coming year will stem from this research.

The team continues to provide outreach to organizations and other state agencies and strengthen its interagency and intra-agency coordination and communication. As a single point-of-contact for environmental permit assistance, the team meets on a regular basis with DECD and DEEP managers and staff to proactively plan and identify opportunities for the service to assist projects through the permitting process to meet optimal timeframes.
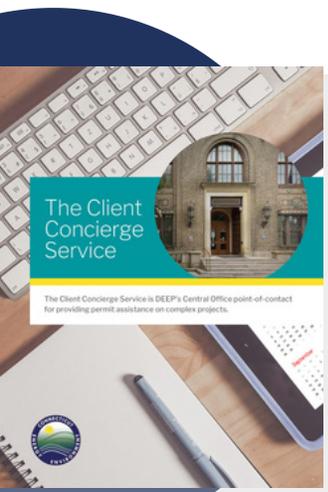
DEEP worked with DECD and the Department of Administrative Services (DAS) to integrate DEEP permit assistance information into the statewide One Stop Business Initiative. One Stop Business now has DEEP information included in their recently released chatbot to lead the public to environmental permits and processes that may be necessary for their businesses. In 2021, DEEP will continue to work towards increasing DEEP's permitting presence in additional components of the One Stop Business Initiative. At the same time, program specific, technical permit staff as well as the Permit Concierge team remain committed to providing follow up on permit related questions within 48 hours, and ensuring that every applicant knows their DEEP points of contact.

Out of the post-permit issuance survey responses received to date, 67% of applicants stated they know their DEEP technical permit staff contact; 70% reported they received a response to their inquiries submitted to DEEP within 48 hours; and 63% reported they have been satisfied with the permit review process. In 2021 we will continue consideration of ways to improve these results.

Contact the team at DEEP.Concierge@ct.gov
To learn more, visit the Permitting Concierge Website
Watch the Permitting Concierge Overview Video

# GOAL 13: ACCELERATE E-GOVERNANCE INTEGRATION

DEEP continues to invest in Information Technology (IT) resources on high-impact e-governance initiatives that create more efficient, transparent regulatory processes and enable re-allocation of staff resources. In early 2021, DEEP anticipates the launch of several priority e-governance tools including a more user friendly, streamlined docket system for DEEP's Environmental Adjudication unit, Bureau of Energy Technology Policy, and the Public Utility Regulatory Authority (PURA); expansion of DEEP's EZ-file system for permitting (includes six additional authorizations: structures, dredging and fill and certificates of permissions for coastal and tidal wetlands activities, spill contractors, solid waste transporters and aquatic pesticides); and E-licensing of pesticide applicators and products (see Goal 7 discussion). This will speed up processing of the high volume universe of the approximately 150 certificates of permissions, 60 structures, dredging and fill individual permits, 70 spill contractors and 7,000 pesticide authorizations requested annually with the potential to expand to include the 12,000 annual pesticide registrations.

We also initiated the development of an electronic Sites Cases Management System to track releases for protection of human health and the environment; develop cases; and make sure sites are cleaned up. This potentially addresses a universe of 6,000 dispatch/spill reports and 7,000 remediation sites and is an essential IT tool for DEEP's new release-based approach to site clean-up.

Throughout the public health pandemic in 2020, DEEP's Information Technology, Human Resources and Public Affairs teams successfully provided support for a myriad of needs from across the agency that require quick, innovative solutions such as digital platforms for meetings and collaboration and website support for fast paced posting of pandemic related operational changes **available on our website**. DEEP has responded quickly to provide guidance and regulatory flexibility for regulated entities where appropriate.

GOAL 14: ENHANCE DATA TRANSPARENCY ✓

Documents Digitally Available:
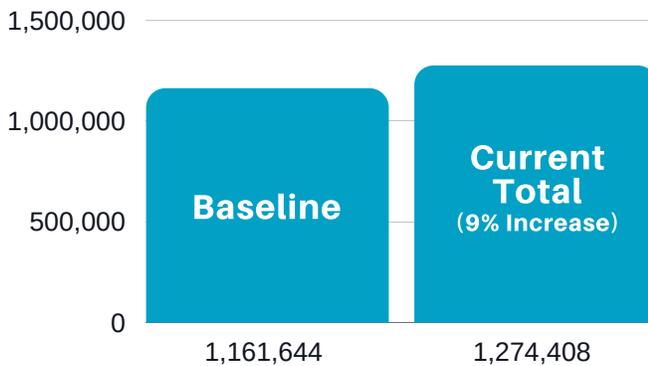
Prioritizing digitization of files and making them freely accessible to the public on-line has paid dividends as this year DEEP staff and stakeholders adapted to remote work. For example, while DEEP's records center at 79 Elm Street was closed to the public for much of the year, the digitization of Hazardous Waste Manifests ensured that members of the public would have uninterrupted access to the over 1 million in total documents through **DEEP's Document Online Search Portal**.

In 2021, DEEP's efforts to digitize files will continue with an emphasis on the 130,000 historic spill reports and the 3.8 million records of remediation files that comprise many of the files in DEEP's record center. While these efforts require a significant investment of capital and staff resources to get the historic records digitized; for the future, this will greatly reduce staff's time on intensive search and document production. Typically, our records center receives a high volume of daily visitors. Per month, there are 100-180 file requests—some with multiple files per request. **This digitization will also reduce DEEP staff time focused on certain Freedom of Information Requests (FOIA) for documents and provides 24/7 access for the public to retrieve the documents.**

DEEP greatly expanded its presence on the **CT Open Data Portal** since the initial baseline of 20 Open Data datasets. DEEP launched the **DEEP Geographic Information Systems (GIS) Open Data website** which provides over 200 GIS datasets as well as easy access to a number of DEEP GIS web applications and public viewers. The DEEP GIS Open Data portal is fully integrated with the CT Open Data Portal so the public can easily search for these datasets from either portal. **Overall, DEEP now has over 230 datasets accessible through CT Open Data which is 10.5 times greater than the initial baseline!**

GOAL 15: DEVELOP PREDICTABLE REGULATION ADOPTION TIMELINE ✓

Stakeholders should know when key milestones for regulation adoption will be completed. DEEP continues to work on the more than 20 regulations that are under development. For continued transparency, a **comprehensive list of regulations** either in the approval process, or under development are available on **DEEP's Laws and Regulations website**.

Transparency

GOAL 16: INCREASE STAKEHOLDER ENGAGEMENT IN PROCESS IMPROVEMENT EFFORTS ✅

During the last two quarters of 2020, as part of the Connecticut Coalition for Sustainable Materials Management (CCSMM), DEEP embarked on a robust stakeholder engagement process - seventy-four municipalities joined DEEP in committing to explore ways to reduce the amount of waste that is generated in our state, improve reuse, recycling, organics collection, and other innovative solutions. CCSMM is looking to the future to find preferred ways to reduce and manage the amount of waste produced in Connecticut that provide system reliability, environmental sustainability, and fiscal predictability.

Four committees were convened to propose solutions on the following areas: recycling; unit based pricing; food composting; and environmental producer responsibility. **At the beginning of January 2021, final recommendations were presented by each of the Co-Chairs to all of the stakeholders.** We learned that one-third of what residents throw away are food scraps and yard waste that can be composted or processed in an anaerobic digester. Forty percent are recyclable materials—paper, plastic, metal, glass. We heard from large cities and small towns who saw their residents' trash volume drop by 40%—immediately, permanently—when they implemented "pay-as-you-throw" or unit-based pricing.

CCSMM stakeholders identified proven, affordable solutions that can be successfully implemented in cities and towns right here in Connecticut, including through legislation, such as extended producer responsibility programs for gas cylinders; bottle bill reform; and strengthening the diversion requirement for businesses and institutions that generate large amounts of organic waste. Every ton we reduce, reuse, or divert from a landfill or waste-to-energy facility helps us provide system reliability, environmental sustainability, and fiscal predictability, in a manner that lessens impacts on environmental justice communities that host a disproportionate share of the state's waste disposal infrastructure.

In 2020, as part of the Governor's Council on Climate Change, through the pandemic, seven work groups, made up of more than 230 volunteer-experts from universities, businesses, advocacy groups, and state and local government came together to develop over 1,000 pages of reports and recommendations for tackling the climate crisis, with equity and environmental justice at the center.

In the beginning of January 2021, we delivered to Governor Lamont 61 recommendations for near-term actions to continue our progress in reducing emissions, and to make our state more resilient to climate change impacts, including natural and working lands. In 2021, DEEP will engage stakeholders for input on types of performance metrics and updates from our 20BY20 initiative that they found useful and want to continue to learn about on a regular basis. Certain 20BY20 metrics will continue as features on DEEP's website such as permit timeframes; progress reducing legacy permits; regulations; permit assistance and concierge service and enforcement and compliance.

To receive updates on opportunities for stakeholder participation in 20BY20 initiatives, please register for our email list at www.ct.gov/DEEP/20BY20.

GOAL 17: INCREASE THE TRANSPARENCY OF ENVIRONMENTAL ENFORCEMENT ACTIVITIES ✓

To protect our environment and natural resources during the pandemic, DEEP continued to monitor adherence to environmental statutes and regulations through the use of our strong compliance assurance tools. DEEP relies upon a broad range of regulatory, permitting, assistance and enforcement tools to maximize protection of public health and the environment, maintain a strong, credible enforcement presence and to minimize potential impacts that regulated activities can have on the environment. The enforcement and/or compliance tools the Department employs include inspections, data tracking and monitoring, compliance assistance, and administrative enforcement.

For the transparency of DEEP's environmental enforcement activities, DEEP's website provides an overview of the tools available to DEEP and the policies associated with Department enforcement activities. Enforcement statistics totals for 2020 and links to past and 2020 formal enforcement cases are included that identify the violations and civil penalties and/or supplemental environmental projects. **Throughout 2020 during the pandemic, DEEP continued to monitor compliance and prioritize our response to imminent or actual threats to human health and the environment.**

DEEP field staff conducted field inspections when they could practice appropriate social distancing and other necessary safety measures as well as focused on monitoring through audits of facilities that included analysis of available emission data and site records. Effective compliance monitoring and deterrence including responses to complaints continue to be essential ingredients of a strong enforcement program. The regulated community is expected to comply with CT's environmental laws during the pandemic and is required to notify DEEP immediately of imminent or actual threats to human health or the environment. DEEP will take whatever action is determined to be appropriate under the circumstances.

To increase availability of compliance monitoring and enforcement information to our stakeholders, this year DEEP introduced on our website an additional tool with valuable data available for communities and regulated entities to access - EPA's **Enforcement and Compliance History Online (ECHO)** which provides fast, integrated searches of EPA and **state data** for more than 800,000 regulated facilities. ECHO focuses on **inspection**, **violation**, and **enforcement data** (both formal and informal, e.g, Notices of Violation) for the Clean Air Act (CAA), Clean Water Act (CWA) and Resource Conservation and Recovery Act (RCRA) and also includes Safe Drinking Water Act (SDWA) and Toxics Release Inventory (TRI) data.

In 2021, DEEP will continue to explore additional opportunities to provide accessible enforcement and compliance information on DEEP's website and to communicate significant enforcement milestones with noteworthy deterrence and environmental and natural resource protection and the type of enforcement tools applied to attain compliance.

GOAL 18: SEEK OPPORTUNITIES FOR INNOVATIVE PARTNERSHIPS TO ENHANCE SERVICES ✅

To further public outreach on outdoor recreational opportunities, DEEP continued participation in the national **#ResponsibleRecreation** campaign, providing tips and information to help people recreate safely and responsibly whether they were hiking, mountain biking, viewing wildlife or simply enjoying all the physical and mental health benefits of being outdoors. **A webpage dedicated to Responsible Recreation** was created and shared on social media and in electronic newsletters. As the Covid-19 pandemic continues, this initiative is a way to remind people to practice social distancing while recreating and to encourage them to learn more about having a safe, enjoyable, memorable time in nature while taking time to decompress from daily stressors. Several related articles were published in **Connecticut Wildlife magazine** and featured topics ranging from being fire safe to keeping wildlife wild to recovering and recycling fishing line to hiking responsibly with dogs, and much more!

A video series **Living With Black Bears** was initiated and the first two installments provide tips on avoiding attracting bears to your yard and on what to do if you encounter a bear while recreating. These videos were shared on social media by many municipalities statewide. DEEP will continue to develop and promote this important message in 2021. We continue to develop new ways to build conservation partnerships during the pandemic. A community science initiative involved creating a new, **online wildlife sighting reporting system on the DEEP website**. This allows the public to help biologists gather observation data on bears, bobcats, and moose and enables us to monitor their population distribution statewide and as we've learned through submissions, this includes all our communities—from urban centers to rural woodlands.

To continue to meet the needs of families with altered education formats, Master Wildlife Conservationists have partnered with Connecticut's libraries to provide online learning opportunities for patrons focusing on wildlife natural history and conservation on topics ranging from bears, bobcats, and beavers to bald eagles and even to Connecticut's Changing Landscape. DEEP educators have assisted schools with webinars, presentations, and activities to meet national science standards including habitat, food webs (energy transference), and scientific data collection during this year of hybrid learning. DEEP staff have partnered with the Connecticut Outdoor Environmental Education Association to enhance equity and inclusion opportunities in the organization and the field. To provide wildlife viewing opportunities and bring nature to the virtual world, we have created a video field trip series featuring Belding Wildlife Management Area for use by the Vernon School System.

Transparency

This video was shared with middle school students throughout the Vernon school district who experienced challenges during the pandemic participating in their typical in-person field trips. A series of short videos featuring fun forest facts have been developed and featured on social media to help people learn more about everything from identifying poison ivy from Virginia Creeper to understanding why leaves change colors. These videos were also used as supplemental online resources for the Connecticut's virtual Envirothon event this year. In addition, a Zoom presentation on *Photography Field Basics* was developed to help residents learn virtually about field technique and protocols for photographing wildlife and will help them develop the skills they need to enjoy the naturally socially distanced recreational opportunity provided by nature photography.

As we continue to adapt our business practices to address the challenges of the current pandemic, we are pursuing development of new resources to make outdoor recreation more accessible to new and returning hunters and anglers. New **user-friendly webpages** were created to help people interested in hunting learn what they need to do to get started. **"Hunting Roadmaps"** were created for small game, pheasant, wild turkey, deer, and waterfowl hunting as an easy way to know exactly what you need to have an enjoyable day afield. To facilitate access, a landing page for Public Hunting Areas was developed with a link to the Interactive Hunting Area Map including basic directions and helpful tips for using the map more effectively. A new, quarterly electronic newsletter, **Hunter Highlights** was launched to provide timely information about hunting and hunter safety.

The State Parks Division and Connecticut Resource, Conservation & Development, Inc. continue work with the 12 towns along the Air Line State Park Trail (ALSPT) to develop a master plan which will evaluate the economic significance and value of ALSPT and help sustain it through development of a regional collaborative. Accomplishments since February 2020, include: **A draft project webpage** with an interface for committee member input by log-in. A task force of professional volunteers (including some DEEP staff) was assembled and is working to help map and provide data on critical amenity assets for the trail and nearby environs in the towns. Volunteers are working with the University of Connecticut and Connecticut Main Street Center through the **First Impressions Community Exchange Program**.

This collaboration will provide community assessments for the 12 towns along the Air Line State Park Trail. The structured community assessment and report will provide an independent perspective on the appearance, services and infrastructure available in each town. Reports will be used to inform community policy and action as part of the master plan process.

GOAL 19: ENHANCE USE AND EASE OF FINANCIAL ASSURANCE MECHANISMS AS PART OF PERMITTING AND ENFORCEMENT ✔

DEEP approached this goal regarding financial assurance requirements by examining both internal protocols and external communications to the regulated community.

DEEP staff from the legal office, financial office, and the regulatory programs worked to develop a final draft of a Standard Operating Procedure (SOP) that instructs staff to ensure financial assurance instruments are consistently received and processed and to guide the use of standard template forms as required. The SOP will include standard instructions for submission of any financial assurance instrument to a central office which will aid in their security and ease the process for their amendment or return upon notification from a bank or DEEP client.

In 2021, DEEP will launch a broader web page that provides access to these materials and builds off the existing page for financial assurances related to the **hazardous waste program**. DEEP is in the process of updating financial assurance requirements related to solar developments requiring coverage under the General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities. In addition, the recently approved Remediation Standard Regulations provide updated financial assurance requirements related to remediation activities. Once these updates are final, links to these requirements can be provided via a more general financial assurance page to provide easier access to program specific materials.

DEEP looks forward to updating the status of these particular programs in the near future. Interestingly, the COVID pandemic saw some changes in the protocols of certain banks that may allow for the acceptance and processing of some additional documents electronically. DEEP's launch of an eFiling system will also provide an access point for the submission of financial assurances related to PURA proceedings. Upon analysis of its performance and utility, DEEP can expand the use of the tool to provide coverage for financial assurances provided for other regulatory programs as a means to track and provide access to needed data.

DEEP views financial assurances as a useful tool to ensure compliance with permitting requirements and has broad authority to require financial as part of permitting or enforcement requirements under § 22a-6(a) of the Connecticut General Statutes. DEEP continues to work on reviewing the types of financial instruments utilized by various programs and develop templates, as needed; identifying the circumstances that warrant reliance upon a financial assurance mechanism; and developing Frequently Asked Questions (FAQ) for the regulated community to strengthen the transparency, consistency and predictability on DEEP's use of financial assurance mechanisms.

Transparency

GOAL 20: UPDATE SPILL-REPORTING REGULATIONS ✔

Regulations related to release reporting have been long sought by the regulated community and been the subject of three prior attempts by the department. Goal 20 specifically identified work on this regulatory concept as we believe that clear and concise standards pertaining to the triggers for reporting the release of substances such as oil, petroleum, chemical liquids and harmful hazardous materials would be advantageous not only to the regulated community but to the efficient and effective use of DEEP's resources.

Pursuant to section 22a-450, there is currently no limitation for reporting a release and therefore, all releases are reportable. As a result, DEEP receives more than 6,000 spill reports each year. DEEP uses such reports to determine which releases necessitate the dispatching of DEEP's emergency spill responders. By more clearly specifying the types of releases that need to be reported, DEEP expects that there will be a significant reduction in the number of releases actually reported each year. This reduction in the number of reported releases will help DEEP focus its resources on the most significant releases which pose the greatest risk to public health, safety, and the environment.

In July 2020, DEEP staff convened a stakeholders meeting on the key issues of the draft proposed regulations with public comments accepted over a 30-day period. The overall response was very positive and a majority of commenters indicated that the proposal would be a significant improvement over the current state. DEEP has considered the comments, adjusted the draft language and the regulations is presently undergoing internal review.

We are excited about support for these regulations and believe that they will promote a more timely intervention and mitigation of releases, improve the quality of information as well as enhance DEEP's Emergency Response Program by allowing DEEP to concentrate its limited resources on those releases of materials that may pose a serious and immediate threat to human health, public safety and environmentally sensitive areas. We anticipate initiating the formal regulation adoption process early this year.

Spill Reporting

Currently at OPM/OTG Review Stage

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5	STEP 6	STEP 7	STEP 8	STEP 9
Scoping	Drafting	Internal Review	OPM/OTG Review	Notice/ Comment	Attorney General's Review	Draft Finalization	Regulation Review Committee Agenda	Approval

KEY

Baseline

Q4

Transparency

THANK YOU FOR READING.

For all future updates, please **visit our website.**