

From: [Randy](#)
To: [DEEP ClimateChange](#)
Subject: Comments on Executive Order No. 3
Date: Friday, November 08, 2019 5:01:48 PM

I hope to see more the governor more publicly 'connecting the dots' between decarbonization goals, green building, and community and economic development through socio-economic innovations and cross-sector synergies that help renew Connecticut's aging infrastructure, economic base, and resilience capacity. For example: Circular Economy (<https://www.ceguide.org/Strategies-and-examples/Make/Dematerialization>), WELL Building (<https://www.wellcertified.com>), B3 Benchmarking (<https://www.b3mn.org>), and Project Drawdown (<https://www.drawdown.org>).

Through support for initiatives like these, Connecticut citizens and businesses may be inspired to both share and rebuild the wealth of our beautiful, renewable natural resource assets. By linking carbon-smart lifestyles with regenerative environmental benefits and economic drivers, you will help assure Connecticut's sustainable, resilient future - and our state's positive contribution to the growing global commitment to restoring health to our small and fragile planet.

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From: [Kane, Leslie](#)
To: [DEEP ClimateChange](#)
Subject: Public Participation Comments on GC3
Date: Wednesday, November 06, 2019 7:15:35 PM
Attachments: [image001.png](#)

Comments by Audubon Connecticut

Leslie Kane, Managing Director

Please accept these comments on a several of the questions for which you are seeking comment.

1. Which sectors and systems will be impacted by climate change and its related hazards and in what way?

No comment

2. What additional science and data are needed to better understand and address the expected impacts of climate change on vulnerable communities and ecosystems in Connecticut?

The National Audubon Society has just completed our latest report, [Survival by Degrees](#). We invite you to take a look at our [Birds & Climate Visualizer](#) (this is the main landing page - scroll down to find the visualizer) - which allows the user to query by zip code to see which impacts from climate change are predicted for your area, and how birds near you will be affected. This tool was also recently highlighted in DEEP's Wildlife Magazine.

Bird Species on the Brink

Using the latest climate change models and known home ranges of 604 North American birds, National Audubon Society scientists were able to predict how each species' range will shift as climate change and other human impacts continue to influence the continent. The results indicate that two-thirds (389 out of 604) of North American bird species will be forced to relocate as the climate warms, and many of those species may not survive. Audubon's Birds and Climate Visualizer shows how a warming climate will impact not only birds, but people as well.



[See how a warming climate will impact birds . . .](#)

The Survival by Degrees report allows individuals to see how climate change is impacting ecosystem zip code by zip code. We believe this is a powerful tool for educating citizens about climate change.

3. How will we ensure diverse stakeholders are engaged throughout the planning, development, and implementation of adaptation and resilience strategies?

As an environmental organization focused on protecting birds—and the places they need—Audubon has an extensive group of people that we can reach via our outreach network.

Please keep us in mind as an organization that can assist DEEP in engaging environmental stakeholders.

4. How can we prioritize climate change mitigation and adaptation strategies that protect vulnerable communities disproportionately affected by the impacts of climate change?

No comment

5. What strategies can we employ to protect and harness our natural resources to mitigate the effects of climate change while fostering natural resource adaptation to a changing climate?

Nature-based solutions in infrastructure have been shown to protect important habitat, while also providing long-term and cost-competitive flood reduction benefits. These methods include restoring and protecting wetlands, dunes, beaches, oyster and coral reefs, eelgrass beds, and mangroves.

The Federal Emergency Management Agency (FEMA) is currently developing its new Pre-Disaster Hazard Mitigation Grant Program. This program dedicates funding to pre-disaster planning and infrastructure projects that help improve flood resilience in communities before disaster strikes. Audubon is encouraging FEMA to allow natural infrastructure projects to qualify for pre-disaster mitigation funding, not just “grey” projects. By including natural infrastructure in its suite of supported projects, FEMA will encourage flood resilience efforts that provide critical bird habitat, filter out water pollution, and create a range of lasting community-wide benefits.

We also believe that the private insurance market should be engaged in supporting Nature-based solutions in infrastructure as a mechanism to reduce overall flooding risk.

6. How can federal, state, regional, municipal, and local adaptation efforts best be aligned to maximize impact and benefits?

No comment

7. What funding sources and mechanisms can we leverage to advance investment in adaptation and resilience?

See Item 5.

Respectfully submitted,
Leslie Kane

Leslie MacLise-Kane | Managing Director
Audubon Connecticut
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Southbury, CT 06488
Cell: 203.494.7980

From: [John Barnowski](#)
To: [DEEP ClimateChange](#)
Subject: public comment regarding Executive Order No. 3 (E.O.3)
Date: Monday, November 04, 2019 9:17:47 AM

I applaud Governor Lamont's extension of Connecticut's environmental efforts. It appears that this Executive Order (E.O.3) provides a comprehensive plan to further study and address issues related to global warming/climate change on many fronts. The one area that appears to be lacking is public education on these issues. Unfortunately, climate change deniers still sow doubt in the minds of too many people. Presumably, statements and progress reports will emerge from the Governor's Council on Climate Change and relevant subcommittees. Every effort should be made to fully publicize any such announcements and plans. Also, I think it is important that at least one of the "individuals who represent business and industry" be a decision maker from the electric or gas utilities. Those industries are not only intimately involved with resiliency, but must make long-term plans for adapting infrastructure to the changes brought about by mitigation of GHGs. Such plans are also expensive to implement.

Public and utility buy-in of the recommendations of the Council will be critically important to its success.

Finally, as a land trust member and environmentalist, I understand the detrimental effects that continued climate change can have. Regardless of the cause of such changes (though the evidence certainly implicates human actions), not adapting the human landscape for those changes will certainly be very troublesome, if not catastrophic.

Yours truly,
John Barnowski
Colchester, CT

From: [Herster Barres](#)
To: [DEEP ClimateChange](#)
Cc:
Subject: Governor's Council of Climate Change
Date: Sunday, November 10, 2019 3:41:48 PM
Attachments: [Cutler analysis e.docx](#)
[Loud Fuel 6yrs 24Aug16 yes.doc](#)
[LIST OF PROJECT NAMES 9Nov"18 yes"18.xls](#)
[Clark Lane voting 15Jun"18f.doc](#)

DEEP suggestions on managing CT's GHG emissions for the Guvenor's Council on Climate Change.

You should consider including a program for negative emissions in your plan. CO2 and other greenhouse gases already in the atmosphere are causing climate change. If we do not extract CO2 from the atmosphere, we will continue to suffer the effects of climate change for more than 100 years.

The only current, cost-effective means of extracting CO2 is through reforestation and long-term management of new forests on tropical farms. Reforest The Tropics, a Mystic, CT based non-profit manages a UN applied research and development program that is using a functioning model for reforesting tropical farm pastures in Costa Rica,

Approved by both the U.S. and Costa Rican governments in 1995, we currently manage over 80 U.S. emitter projects, 700+ acres of new forests on 15 farms, that are sequestering CO2 effectively at a cost of under \$20/metric tonne.

Participants include Connecticut College, Yale School of Forestry & Environmental Studies, New London Public Schools, CMEEC, and dozens of other sponsors.

We propose a program of teaching about climate change in elementary schools combined with offsetting the schools' CO2 emissions with renewable energy and forest projects.

See the attached documents and our video showing projects: <https://youtu.be/UJzpJnxZkXc>

Herster Barres, D. Tech. Science, ETHZ '61; M. For. Yale '58
A UN Climate Change Project
USA 860-912-7706 or tel 860-572-8199
Reforest The Tropics, a 501 (c)(3) non-profit organization
28G Cottrell St., Mystic, CT 06355, &
Turrialba, Costa Rica



REFOREST THE TROPICS

A UNITED NATIONS SANCTIONED CARBON DIOXIDE SEQUESTRATION PROGRAM

RTT IS A 501(C)(3) NON-PROFIT ORGANIZATION

ACCEPTED BY UNFCCC-AJI IN 1995 TO DEMONSTRATE THE EFFECTIVENESS OF TROPICAL FORESTS TO FIX AND STORE CARBON EMISSIONS

28G Cottrell St. Mystic, CT 06355 - (860) 572-8199 - info@reforestthetropics.org - www.reforestthetropics.org

THE CUTLER MIDDLE SCHOOL CARBON-OFFSET FORESTS

Nov. 5, 2019

In 1998, RTT staff in Mystic, CT gave several talks on climate change to students at the Cutler Middle School. It was pointed out that, because of the potential for climate change, the school might want to consider offsetting their CO₂ emissions. CO₂ is the principal greenhouse gas, emitted as the school uses fossil fuels that generate the electricity they use, fuel oil for heating and gasoline and diesel in vehicles and lawn mowing.

Today, 21 years later, climate change in the form of global warming is recognized as a major challenge to our survival on earth. Ahead of their time in 1998, the students of Cutler and Pam Ryley, their teacher, decided to act to help sponsor a RTT Model forest on a farm in Costa Rica to offset their emissions. Trees capture CO₂ through photosynthesis, releasing oxygen into the air and sequestering carbon (C) in the form of wood in a live stand of trees. The students raised \$741, 7% of the total raised from 26 donors combined to establish 26 acres of forests on four farms in Costa Rica in 1998.



Left, Cutler students in 1998. The motto in their banner states: **“Towards a carbon balanced world. Start here with us.”**

These 4 forests have been managed and measured annually since established by Reforest the Tropics. Cutler’s donation has resulted in a sequestration of **366 tonnes of sequestered CO₂ in 20 years** or **17 tonnes each year in the 26 acres.**

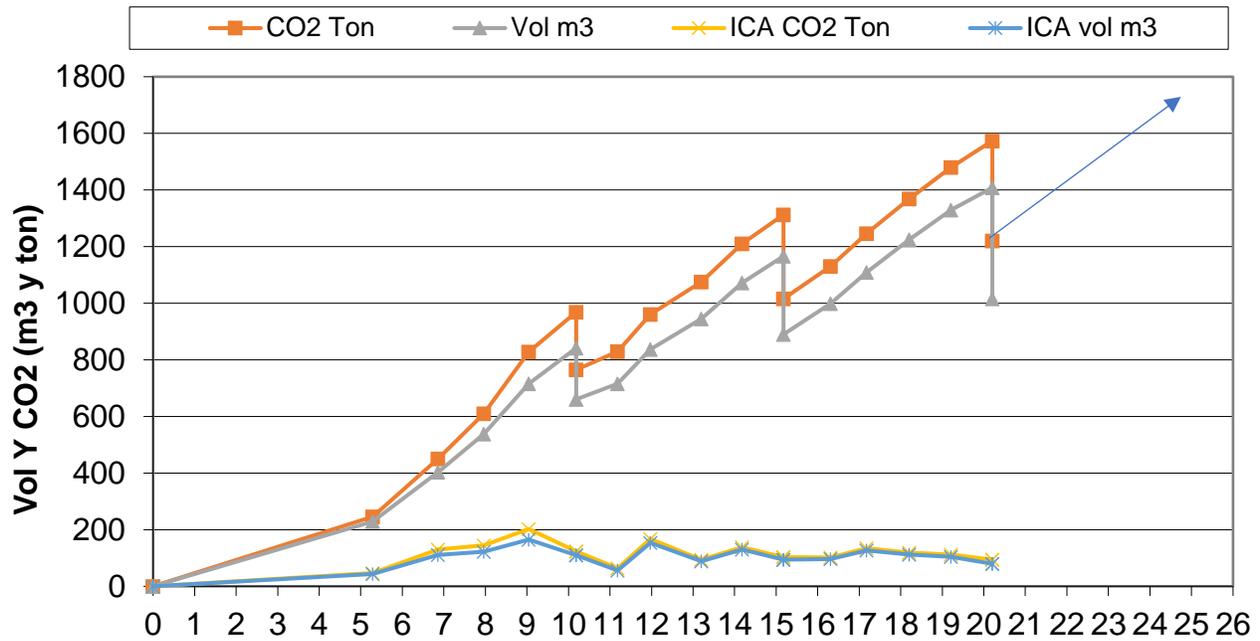


The 26-donor forest in the next photo was designed for ecological sustainability by using multiple tree species. It has an initial 25-year contract. Management involves carbon sequestration combined with light periodic thinnings to stimulate the forest growth and also to produce some logs for the farmer to sell. The oxen were extracting the logs to the roadside.

The visitors shown here were Costa Rican students studying the RTT Forest Model. Center in the green shirt, our RTT forester, Rolando Camacho, is in charge of the forest management and measurements of our forests in Costa Rica.

Recently in 2019, the farm owners agreed to sign a second 25-year contract for this same forest ensuring the school that their carbon would be sequestered for at least a total of 50 years. Light thinnings will continue every 5 years to generate income for the farm, enhancing the permanency of the forests and its stored carbon. Research in this UNFCCC program continues to improve the RTT Model.

26 DONOR FOREST, CO2 AND VOL AT 20.21 YRS



Above, the measurements of growth and carbon sequestration of one of the four forests in which Cutler participates. This forest is in the Las Delicias farm owned by the Rojas Family in the Atlantic Zone of Costa Rica. The blue arrow represents the estimated future growth to reach our goal of 500 tonnes of sequestered CO₂/hectare by 25 years. RTT graphs from the school's forests can be used in STEM teaching.

Below left, is a current photo of Justin Caras, now 36 years old. He's the student standing next to the teacher in the original Cutler photo. Dr. Barres is on the right.



On the right, the photo shows a thinning of the Cutler Forest for farmer income. Combining farmer income and sequestration is a key to the permanence of the farm forest and its sequestered CO₂e. The RTT Model Forest uses mixtures of tree species to achieve our goals. The log being extracted by the oxen from the Cutler forest was sold for his income. Thinning also opens the forest to stimulate the growth of the remaining trees and increase the rate of sequestration. Mixtures may include mahogany, cedar and other valuable species.

Currently, RTT manages over 80 forests for U.S. donors, sequestering 2,000 tonnes of CO₂ each year in 700+ acres in 15 farms in Costa Rica. Dr. Herster Barres is the Founder of RTT and Director of Research and Environmental Education. Information at hbarres@reforestthetropics.org. Our websites are reforestthetropics.org and <https://youtu.be/UJzpJnxZkXc>



In cooperation with the Las Delicias Farm in Costa Rica, in June 2010 Reforest The Tropics (RTT) established a 2 ½-acre forest to capture and store some of the CO₂ emissions from the fleet of delivery trucks of the Loud Fuel company in Massachusetts.

In this photo, the forest is now 6 years and 2 months old. Measured each year, the forest has captured a total of 59.6 metric tonnes of CO₂ at the last measurement, 5.5 years of age.

Those 59.6 tonnes of CO₂ are the emissions from 6,569 gallons of diesel. At 20 lbs of CO₂ emissions/gallon and 5 mi/gallon, that's 32,848 miles of CO₂-free oil deliveries to their clients since the forest was planted in June 2010.

In addition, this forest was thinned a year ago, releasing logs for the farmer to sell. Since the trees were so young, the logs were small, but thinnings are planned every 5 years from now on, with a goal of eventually giving the farmer a steady income from the extracted logs even while sequestering CO₂ for the account of Loud Fuel. This may replace income from cattle on the same pasture, now reforested.

To reduce the risks of damage to the forest from introduced or native insects or eventual diseases, we use mixed species stands. In this case the 5 species are Klinkii, the Rainbow tree, Cedar, Roble Coral and the Ocora tree, just behind the sign right.

These species have been carefully selected to meet the needs of efficient CO₂ capture and farmer income in an ecologically and economically sustainable permanent farm forest.

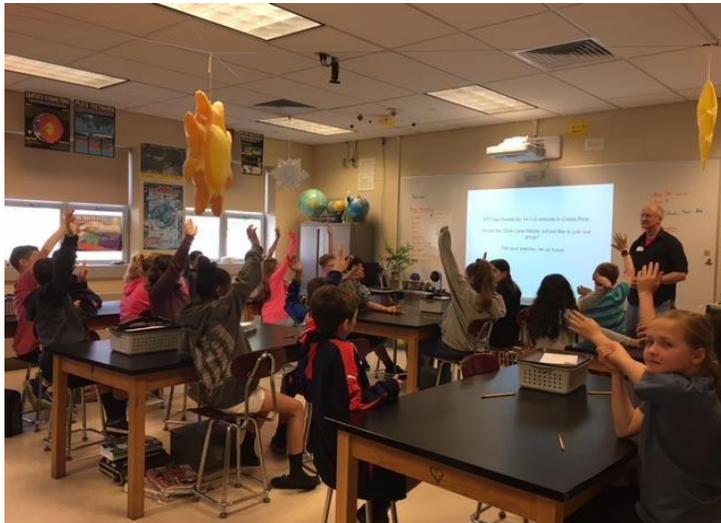
This model of forest is a product of 50+ years of research and development by RTT staff.

Essential to this successful research is the participation of the Rojas Family, owners of the Las Delicias Farm near Pocora, CR. This farm hosts 38 forests sponsored by dozens of U. S emitters.

RTT is a non-profit organization that manages this UNFCCC-AIJ program. Info at hbarres@reforestthetropics.org. Photo: Loud Fuel 6yrs 24Aug2016

RTT ENVIRONMENTAL EDUCATION IN CONNECTICUT & RHODE ISLAND

eShaping Society Towards Sustainability, June, 2018



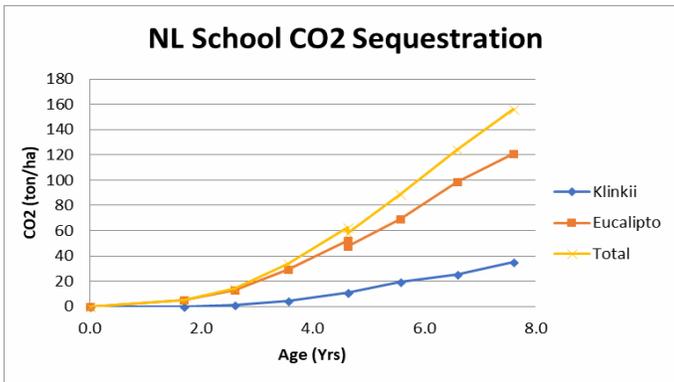
Clark Lane Students vote for a forest, March 30, 2019

By age 9 years, this forest has captured 199 tonnes of CO₂e/ha

Teaching about climate change with a tropical forest. In the photograph on the left, Clark Lane Middle School 6th grade students in Waterford, CT, participate in a 6-lesson series on climate change culminating by voting for establishing a forest in Costa Rica to offset some of their school's CO₂ emissions. Sponsored by Reforest The Tropics, a CT non-profit organization in Mystic, CT and associated donors, students not only learn theories and basic concepts of climate science through collaborative small group work, but also generate solutions to the problem and take meaningful action to begin to balance their school CO₂ emissions in a dedicated 2 ½-acre forest in Costa Rica. Educational entities in CT and RI participate in RTT programs.

Schools with RTT forests with dates of planting

- J. Winthrop High School 1998
- Cutler Middle School 1998
- Stonington, ME Elementary School 1998
- Connecticut College 1999 & 2000
- West Side Middle School in Groton, CT 2006
- Karen Valente, retired teacher 2007
- Hotchkiss (2 forests) 2007 & 2010
- Yale School of Forestry & Environmental Studies (Class of '07) 2008
- New London, CT Public Schools (shown above) 2010
- Westerly, RI Middle School 2011
- NL Regional Multicultural Magnet School 2015
- Rockport, MA High School 2017
- Tower School, Marblehead, MA 2017
- Gloucester, MA High School (being planted) 2018-2019
- Wesleyan University in CT, 2002



CO₂e captured in the above school forest. This program provides material for STEM teaching.

RTT forests are the result of more than 50 years of R&D to improve farm forests' capacity for current and future CO₂ sequestration. **Selected species of trees are planted in innovative mixtures can efficiently store CO₂ for long-term. They can simultaneously generate income for participating farmers whose pastures are reforested in partnership with schools.** Our goal is one hundred years of CO₂e storage, programmed as 4 successive 25-year contracts that include funding the establishment of the farm forests and sales of verified CO₂ storage credits, a new exportable farm product, permanently locked into a forest.

U.S. emitters benefit from low-cost offsets by sponsoring forests. RTT forests can contribute to mitigating climate change and can make a significant reduction in the management of schools' CO₂ emissions. The average cost to balance a school's CO₂ emissions is about \$20/student year.

Currently, RTT manages 89 dedicated forest projects (700 acres) in 14 farms for more than 100 U.S. businesses, social organizations, families and schools. Web site: Reforestthetropics.org. Contact: Greg Powell, RTT Executive Director, tel

From: [Tim Bezler](#)
To: [DEEP ClimateChange](#)
Subject: Public Comment
Date: Wednesday, October 30, 2019 12:07:00 PM

Regarding the Governor's Council on Climate Change (GC3), I am proud to live in a state and region that is aligned with California and other progressive states who are committed to the Paris Accord. Connecticut needs to strengthen its opposition to Trump and the Republicans, who continue to deny that climate change exists and have essentially withdrawn from the rest of the civilized world.

If Connecticut is serious about addressing climate change, however, there are two issues that need to be addressed now:

1. The proposed fracked gas power plant in Killingly cannot be allowed to proceed. This plant would spew carbon and greenhouse gases into our air for decades and is in direct conflict with Connecticut's stated goals. Any additional electrical power in CT should come from wind or solar, not fossil fuels. Governor Lamont must stop this project.
2. Also, the Pipeline Tax, which would allow electric utilities to charge ratepayers directly to build a new fracked gas pipeline, must be repealed. Although hydraulic fracturing is not allowed in our state, allowing fracked natural gas to be used here is subsidizing and encouraging continued use of this environmentally disastrous technology.

Please make sure Connecticut "walks the talk" and continues to be a national leader in combating climate change for the sake of our children and grandchildren.

Sincerely,
Tim Bezler
178 Glengarry Road
Fairfield, CT 06825
Cell: 203-731-4318

From: [DAVID BINGHAM](#)
To: [DEEP ClimateChange](#)
Subject: Executive order #3
Date: Monday, November 04, 2019 3:40:12 PM

Thank you for the opportunity to comment on Executive Order #3. The update of the 2011 recommendations and the expansion of Governor's Climate Change Council's work are welcome indications that CT's executive administration is committed to making progress on dealing with the climate change crisis.

The Council's 2018 report concludes (last paragraph): "Natural and working lands consist of forests, farms, rangelands, and wetlands that sequester carbon and support Connecticut's economy, communities, and ecosystems. Collectively, these lands provide us with an important carbon sink. Connecticut should work with the other New England states to measure and account for changes in land-use practices to inform smart growth and protect valuable core forestland and prime farmland. "

It is hard to overestimate the impact of continued development of natural areas on progressive inefficiencies in transportation and energy use, when combined with the loss of these areas as a carbon sink. Every community has natural areas that are at risk of adverse development.

This State's reliance on property taxes for funding public education puts enormous pressures on municipalities to develop land in order to increase the "tax base" as a way to raise additional revenues.

Without addressing this conflict, many of the advances towards the state goals of energy efficiency and alternative sources of power will be negated because natural areas throughout the state are being carved up, little by little, in a "death of a thousand cuts." While the 2011 report does a great job of pointing out the many benefits of natural area protection, the need has grown since then while CT continues to lose significant forests and farmlands to development each year.

The council needs to

- set significantly higher goals for land conservation, both at state and local levels
- recommend policies enabling municipalities to find new sources of revenue to fund land acquisition and stewardship
- provide grant incentives for local land conservation and stewardship
- encourage buildings that go up on a smaller footprint, not out over the landscape
- find ways to provide incentives for local and private land conservation on a wider scale

Even though climate change is going to occur, a greater emphasis on natural area conservation will provide significant mitigation and resilience to meet the future in a way that

is more sustainable, and also more beautiful.

David B. Bingham, MD
Salem, CT

From: [DAVID BINGHAM](#)
To: [DEEP ClimateChange](#)
Subject: comments on Climate Change Plan
Date: Wednesday, October 30, 2019 6:37:03 PM

DEEP:

While generally excellent, the proposed plan fails to adequately support the need for communities to work with the State on protecting natural areas, including farmlands and forests.

Most municipalities currently have residential zoning regulations that tend to subdivide land. Our towns continue building new and expanded roads, and allow plans that include long driveways, remove vegetation, and fragment forests in ways that contribute to loss of habitat that currently act as a carbon sink and prevent downstream flooding.

Moreover, the development patterns in most communities are sprawling out in a way that makes transportation and residential energy use far less efficient.

By failing to commit to policies that protect these natural areas, Connecticut's future energy needs will be significantly greater, cancelling out many of the savings in energy use provided by the rest of the plan.

David Bingham, MD
Salem

From: [Hugh Birdsall](#)
To: [DEEP ClimateChange](#)
Subject: Governor's Zero carbon initiative
Date: Saturday, November 02, 2019 8:00:47 AM

Zeroing emissions is not enough. Sequestering carbon is also essential. The best way to do it is through stopping deforestation and immediately starting massive reforestation projects. The only place where this can happen quickly enough to mitigate climate change is in the Tropics. Get to work!

Sincerely,

Hugh Birdsall
Clinton, Ct.

Sent from my iPad

Thank you for your request for public input. My name is Lynne Bonnett. I have lived in New Haven since 1990 and been involved in environmental justice initiatives to reduce air pollution from power plants, promoting the first watershed based approach to managing combined sewer overflows in New Haven, and working through volunteer organizations such as the New Haven Bioregional Group and the New Haven Energy Task Force to distribute rain barrels donated by coca-cola to the Greater New Haven Water Pollution Control Authority (to date we have given out more than 100), building rain gardens, educating the public about storm water runoff and combined sewers, promoting energy efficiency and renewable energy technologies in low to moderate income parts of New Haven. I have also lead two citizen science projects to investigate the fate of mercury from the sewage sludge incinerator. I would like to tell you about some of my personal experiences.

ENERGY EFFICIENCY AND RENEWABLES

Why have low to moderate income (LMI) New Haven residents not shared in these opportunities? First of all, >70% rent; half of those live in small multifamily homes of 2-4 units. Generally, each tenant has one electric meter. There are certain barriers associated with this fact.

Solar arrays on residences are sized to fit ONE meter's usage. In a home with 4 meters, an array can only provide enough electricity to meet one meter's usage. There isn't any way for all tenants to share in a solar array - not because we don't have the technology to split the input from an array to each meter but because current rules and regulations prohibit that. (United Illuminating? PURA?) One way for renters to share one solar array would be for the property owner to combine all of the meters into one meter and size the array to serve all the tenants. Not only is this costly but it carries additional liabilities for the property owner.

1. The homeowner would then be responsible for paying the electricity for their tenants. They are not allowed to charge the tenant what that person uses but rather have to estimate a usage and incorporate that estimate into the rent lease amount. If the tenant uses more than that estimate then the property owner has to absorb that extra cost without the ability to recoup their loss.
2. Even in a multifamily home where the owner lives on one floor and family members live on other floors they chose to not combine meters. If at some time in the future the owner wanted to rent to nonfamily members they did not want to be responsible for paying that electric bill.

Energy Efficiency Deeper Measures are administered by United Illuminating (UI) in New Haven using money contributed by rate payers to the efficiency fund. UI claims that they can not effectively deliver deeper measures such as insulation and equipment upgrades because of health barriers in the old homes (many are built before WWII). Tenants can ask for a home evaluation and get a visit from UI's approved vendor list. If the vendor finds mold or asbestos they are not permitted to do any deeper measures. So, UI pays \$100+ for this vendor visit and little happens – perhaps a light bulb exchange.

1. Tenants are afraid to ask for a home visit for fear that code violations will be identified, the landlord will be required to fix the violations and their rent will go up.
2. Landlords likewise do not want inspections for fear of having to fix their delinquent properties.
3. Deeper efficiency measures will not be done until the public health issues (asbestos and mold) are fixed and code violations are fixed - not likely to happen without significant investment dollars that landlords can claim they don't have. They threaten rent increases.

One landlord with a multifamily (9 units) serving section 8 tenants, new roof and good solar exposure did not want to investigate a solar array for their tenants citing the following reasons.

1. Her tenants already get a lot of energy assistance
2. She did not want to combine meters and become responsible for paying the electrical bill for her tenants – “I have enough trouble just collecting rent”. She would not have been able to charge her tenants for their usage further deepening her liability.

I did some outreach years ago in a multifamily development in New Haven. Many tenants never saw their electrical bill; it was taken care of. Apart from issues relating to leaky door frames or windows that didn't close they were not concerned about the cost of their electrical usage – they did not know what it was. Posigen, a company that has had success in providing solar for LMI homeowners, has a name for extra usage when the customer thinks of the electricity as “free”. They give a certain percentage allowance for this phenomenon (maybe 20% - not sure).

My take away points from these examples are that:

1. New Haven LMI renters suffer from a lack of alternative energy investment and lack of energy efficiency investments that would vastly improve their energy security. Despite paying into the energy efficiency fund through their electric bill they have not received any benefit.
2. The reasons for this disparity could be addressed by changing policy decisions that have imposed this one size fits all approach to how these programs can work. For example, why couldn't solar arrays be allowed for all tenants in a building without combining meters?
3. Why couldn't savings from such an investment be plowed back into the property to be used to pay for cleaning up code violations and public health issues in order for people to benefit from deeper energy efficiency standards once these barriers are fixed?
4. Section 8 properties must meet certain standards (not likely to have asbestos or mold barriers to deeper efficiency measures). The notion that tenants on section 8 already get a lot of energy assistance misses the point: who pays for this assistance? We the taxpayer. If taxpayers understood that they are subsidizing an inefficient energy delivery through their tax dollars wouldn't they be more willing to invest to make it less costly in the long run?
5. Why aren't landlords allowed to charge their tenants for their actual usage? Preventing this removes any incentive for tenants to conserve on their energy usage. People must see the economic consequences of their behavior choices in order for change to occur.

The second section of my comments is devoted to Sewage Sludge Incineration to manage sewage waste in CT. New Haven's sewage sludge incinerator, operated by Synagro, incinerates roughly 15% of the total sewage incinerated in CT. Roughly half of what is incinerated in New Haven is from outside our region and trucked in by Synagro to make money. Analysis done by the Yale Environmental Protection Clinic estimates that as little as 33% of Synagro's revenue from this practice is shared with our community that bears the brunt of adverse health effects from breathing the air pollutants from the sewage sludge incinerator. The incinerator is right next to a park (East Shore Park) where children play baseball, soccer and ride their bicycles. It rests against a ridge where roughly 1000 homes are located. Our citizen science project measured mercury emissions from at least as far as 3 miles down wind traveling along the East Shore ridge line along the Quinnipiac River. The emissions are hazardous to our health; there is NO SAFE AMOUNT OF PARTICULATE MATTER according to the EPA. It causes premature death, cancer, heart disease and respiratory illnesses. Hydrochloric acid causes chemically induced asthma. Other criteria pollutants, SOx, NOx, and VOC have adverse health effects. The social costs of this pollution are never included in the cost benefit analysis supporting sludge incineration.

Lynne Bonnett, New Haven resident, public comments re E.O. No. 3 due Nov. 8, 2019, 5:00 PM

The EPA recommends using anaerobic digestion to create methane from sewage. This methane can then be used to power the pumping operations of the waste water treatment plant. It's called beneficial use. It is time for CT to adopt this.

The sewage sludge incinerator uses enough fuel to power about 120 homes according to our calculations. It also emits greenhouse gases. An estimate could be obtained from the following reference: https://www.neorsd.org/!Library.php?SOURCE=library/NEORSD-GHG-inventory.pdf&a=download_file&LIBRARY_RECORD_ID=7364.

Greenhouse gas from incineration includes all aspects of the sludge handling including but not limited to waste hauling, chemical deliveries, water use, electricity use, biosolids combustion to name a few. Synagro reported that 12-15 semi truck loads of sewage sludge are delivered to New Haven's incinerator every day. In fact, analysis from the Yale Environmental Protection Clinic indicated that this is probably lower than what actually occurs.

GNHWPCA is rated to handle 40 M Gallons/day. In fact, it has a daily flow of 23 M G/day when it is not raining and up to 110 M G/day when it is raining. The above reference gives estimates of greenhouse gases for waste water treatment plants of similar size.

Anaerobic digestion, on the other hand, emits far fewer greenhouse gases, does not release hazardous chemicals into the air from the incinerator, and makes beneficial use of this renewable resource by creating methane that could be used to power the waste water treatment plant. It also would drastically reduce the amount of trucking that occurs with our current method.

Our waste water treatment plant is on New Haven's Harbor in a flood zone. It would be better to move it more upstream to a safer, higher, drier place. It would be better if sludge handling was more diverse with anaerobic digesters in strategically regional locations to reduce vehicle miles traveled for sludge hauling. Methane from sewage sludge anaerobic digestion has much less carbon footprint than methane from other sources.

I would like to see a more holistic evaluation of how CT handles sewage and hope that a better analysis can be made. I think that once the externalities of trucking and handling are accounted for that the greenhouse gas emission contribution to overall emissions of the State of CT would be much higher than the current percentage given.

Sewage sludge is a renewable resource, it is not going away. We should make better use of it.

Sincerely,
/Lynne Bonnett/
675 Townsend Ave.
New Haven CT 06512
Lbonnett01@att.net

11/08/2019

To: Governor's Council on Climate Change, re Notice of Request for Public Input

Subject: Wintonbury Land Trust Input

The mission of the Wintonbury Land Trust, Bloomfield, CT includes promoting the preservation, improvement, protection, and conservation of natural resources for the benefit of the community.

Major goals are:

- Protection of natural resources, especially soil and water quality and woodland health.
- Conservation of farms and undeveloped land, e.g. woodlands, wetlands, and wildlife corridors.

The CT Department of Energy and Environmental Protection (DEEP) is seeking public input on [Executive Order No. 3](#) (E.O.3), issued last month by Governor Lamont for the purpose of strengthening the state's efforts to mitigate climate change.

E.O.3 seeks to re-establish and expand the work of the [Governor's Council on Climate Change](#) (GC3) to include adaptation and resiliency and direct DEEP to identify pathways to a 100% clean energy grid by 2040.

E.O.3 and GC3 address protecting vulnerable

communities and natural resources that are disproportionately impacted by the effects of climate change, e.g., scaling up the preservation and restoration of forests and coastal wetlands, green and natural infrastructure and agricultural lands for climate change mitigation and adaptation.

Land conservation and other natural climate solutions (forests, wetlands, healthy soils, etc.) are essential to helping to slow down the pace of climate change.

Forests, farmland and natural habitats can absorb at least 21% of the U.S.'s carbon dioxide emissions (source: Land Trust Alliance). But we need to move quickly -- with 12 years being the outside window of time.

Wetlands, floodplains and other large "natural barriers" adjacent to waterways help to reduce flooding.

Small scale, sustainable farming practices help to enrich soils, thereby increasing carbon storage capacity.

In light of these benefits (and many others), the state needs to prioritize land conservation in its climate change mitigation policies. Suggested policies include:

1. Increasing investments in current state open space/land conservation and farmland preservation programs.
2. Protection of the Community Investment Act which helps to fund open space conservation and farmland preservation.
3. Support creative options for municipal funding

mechanisms for land conservation, stewardship and other projects including for climate change resilience, mitigation and adaptation.

4. Adopt policies to protect and preserve public lands - particularly primary and intact forests with the highest potential for carbon sequestration.

The WLT supports the E.0.3 objectives which recognize the importance of investing in land conservation and incorporating natural climate solutions into Connecticut's goals and policies to mitigate climate change.

The Wintonbury Land Trust also wholeheartedly endorses the Connecticut Land Conservation Council's recommendations.

Respectfully submitted,

Chip Caton

Vice President

Wintonbury Land Trust
P.O. Box 734
Bloomfield, CT 06002
860-286-0239



November 8, 2019

Re: Governor Lamont's Executive Order No. 3

Dear Commissioner Dykes,

As Connecticut's Chapter of the American Planning Association (CCAPA), we strongly support the goals of the Executive Order No. 3 to both reduce greenhouse gas emissions and to ensure a more resilient state that is prepared to deal with the impacts and effects of climate change. We feel that the scope of the framing questions accurately represent the salient issues at hand. In our own recent work with our "Start with Planning" initiative, we created a policy paper that identifies the issues related to resilience, cites resources available, and highlights Best Practices for moving the resiliency discussion forward as communities and within regions. The Resiliency Paper may be found on the "Start with Planning" portion of our website at <https://ct.planning.org/knowledge-center/start-planning/>. Although some New Haven and Fairfield communities and regional agencies completed resiliency studies post-Sandy, we would strongly support developing a state-wide perspective for this evaluation and future mitigation efforts.

The working group thematic areas are appropriate to both alleviating current greenhouse gas emissions and identifying adaptation needs moving forward. CCAPA members are deeply passionate about Connecticut and we play a key role in the development, transportation, and environmental protection of our common home. As embedded professionals, we are diversely distributed through the state, both in public and private sectors and in communities that run the gamut from rural to urban.

We recognize that practicing planners can also be part of the greenhouse gas emissions reduction solution through multi-faceted efforts such as: promoting compact land use and development patterns that reduce vehicle miles traveled; requiring increased tree canopies that reduce ambient carbon; and prioritizing nature-based solutions through our floodplain management responsibilities. CCAPA members are well-positioned to educate constituencies, facilitate important local and statewide conversations about Climate Change and Resiliency, and to incorporate Best Practices into the work that we do every day.

CCAPA hopes that you will rely on our professional practice and expertise and include planners in these crucial conversations moving forward.

Sincerely,

A handwritten signature in blue ink that reads "Emmeline Harrigan". The signature is written in a cursive style and is positioned to the left of a vertical line.

Emmeline Harrigan, AICP, CFM
CCAPA Member and Co-Author – Resiliency Policy Paper

Start with Planning Policy Paper:
Planning for Resiliency

February, 2018

Abstract

Storms Irene and Sandy further awakened Connecticut to the need to focus on the state’s natural hazard vulnerability, climate change impacts, and rising seas and to plan for a more resilient future. Climate Change has already impacted the state through warmer water, erratic weather patterns and rising seas that cause tidal flooding in low-lying neighborhoods even on a sunny day. Economic impacts, moreover, are both along the coast (affecting Long Island Sound shellfish and fishery populations) and also inland (affecting agricultural productivity). Undoubtedly, the floods and inundation risks attributable to sea level rise, significant precipitation events and high winds are the state’s most significant vulnerability and the state’s most frequent occurrence hazard, with resulting financial impacts to government and the private sector.

Connecticut’s densest development is located along Long Island Sound, the spines of the Connecticut, Housatonic, and Thames River, and along the area’s extensive wetlands and watercourses resulting in high numbers of structures that house our people, our businesses, and, most importantly, our infrastructure are at great risk. Infrastructure includes not only road networks, but storm and waste water utilities, cable technology, and potable water supply. Economically, our interstate rail and highway networks, coastal airports and port districts are all vulnerable. Connecticut planners can be most effective in responding to Climate Change through carbon reduction strategies and through resiliency plans, community education, and local policies geared towards limiting future loss.



CT Peach crop loss (Hartford Courant 2016)



2' Sea Level Rise Impacts- Fairfield, CT
 (NOAA Sea Level Rise Viewer)



Surge in tidal marshland areas
 (Stanford Coastal News July 2013)



Resiliency Planning Opportunities

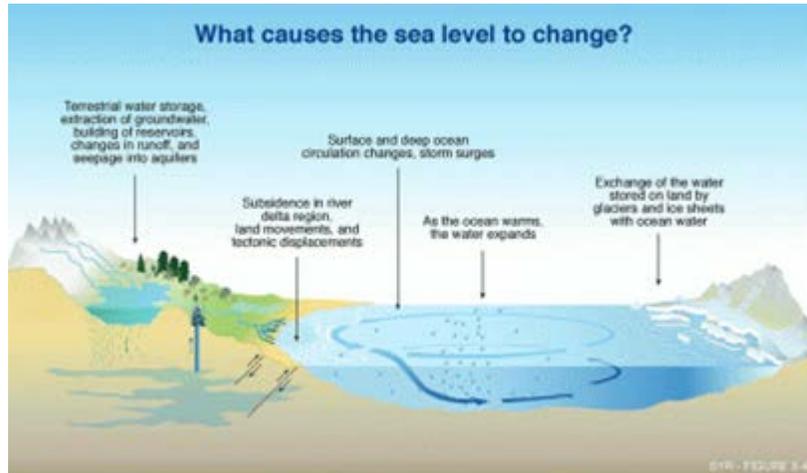
Local and regional planning documents provide the foundation for implementation of resiliency projects, goals and policies that could ultimately result in funding for more focused planning efforts and projects such as acquisition, relocation, elevation or mitigation for infrastructure. The following planning documents provide opportunities to identify risk areas and establish goals to assist communities in their resiliency efforts.

Hurricane Sandy Impacted:

- 5 counties
- 2 tribal nations
- 12,380+ residents (registered for FEMA assistance)
- \$11.5 million approved for housing assistance
- \$32+ million approved in low-interest disaster loans

CT Natural Hazard Mitigation Plan Update (2014, p.2)

- **Plan of Conservation and Development (POCD)** - State Statute requires updating local Plans of Conservation and Developments every 10 years and has a mandated sea level rise section for communities adjacent to Long Island Sound. POCDs can include other resiliency discussion as it affects economic development, agriculture, public infrastructure, and housing in vulnerable areas and direct future land use policies to make these areas more resilient. Local planners can also be a partner in including resiliency discussion in Regional POCDs.
- **Hazard Mitigation Plan (HMP)** – HMPs are required for municipalities or regions that pursue federal disaster reimbursement or grant funding and allow for communities and regions to identify and plan for the mitigation of multiple natural hazards including Nor’Easters, ice storms and droughts.
- **Coastal Resiliency Plans** – Several regional councils of government have initiated this effort with their member towns that specifically examines the sea level rise impacts including the Southern Connecticut Regional Framework for Coastal Resilience cited in the references section.
- **Community Rating System Plans (CRS)** – CRS is a voluntary program of the National Flood Insurance Program and can be initiated by local communities or regions to identify efforts to reduce future flood risks through a combination of education and outreach, better floodplain management regulations, implementing best GIS practices, acquisition and open space management in the floodplain, dam safety and management, and storm water information and management. Most importantly communities must develop a Repetitive Loss plan for flood areas that have been damaged by multiple flooding events that shows mitigation progress for these areas over time.
- **Capital Improvement Plans (CIP)** – CIPS serve as a local municipality’s 5-year funding plan for facilities and infrastructure. Planners can review these plans to ensure that additional new public investment is limited in high-risk areas and future funding is promoted to make structures.
- **Transportation Improvement Plans (TIP)** – Housed within regional councils of governments, TIPs represent a 5-year funding plan for local and regional transportation projects. Vulnerable flooding locations, future sea level rise and inundation threats should be part of the discussion to ensure that our at-risk transportation network is resilient from these impacts moving forward. Planners should also review state-funded transportation projects, not included in the TIP, but potentially affected by Climate Change.



CIRCA forecasts 50 centimeters or 1 foot 8 inches of sea level rise by 2050 and recommends municipalities use this future inundation height for regulatory and planning purposes in high risk flood areas. (October 2017)

Connecticut’s Resiliency Education Resources

Connecticut has initiated several collaborative efforts that assist planning professionals. These include resiliency planning efforts that providing technical data and community education opportunities as well as a pilot project in a few of our major cities that provides an opportunity to see implementation of a resiliency project in person.

- ***Connecticut Institute for Resilience & Climate Adaptation (CIRCA)*** – Created in 2013, CIRCA is housed at the University of Connecticut and brings together several academic disciplines that can provide the scientific data needed for the state to understand future climate change threats, sea level rise risks, and best resiliency practices moving forward. CIRCA provides a broad range of workshops on projects, planning and new data. <http://circa.uconn.edu/>
- ***State Agencies Fostering Resilience (SAFR)*** – SAFR is a consortium, originally pulled together in a broad coalition of leaders in state policy and management, transportation, economic development, housing, regional COGS, insurance, law, and academic institutions in order to apply for the National Disaster Resilience Competition project for federal funds for Storm Sandy’s hardest hit communities in Fairfield and New Haven Counties. SAFR continues to provide workshops and education opportunities in resilience and infrastructure opportunities and their pilot project in Bridgeport.
- ***UConn Center for Land Use Education and Research (CLEAR)*** – CLEAR provides ongoing educational workshops for local environmental protection and land use decision makers through training and workshops in topics such as Climate Adaptation, Green Infrastructure, Coastal Planning, and others.
- ***Environmental Protection Agency’s Flood Resilience Checklist*** - Take the Flood Resilience Checklist to determine your community’s preparedness for possible floods. <https://www.epa.gov/sites/production/files/2014-07/documents/flood-resilience-checklist.pdf>.

“One-third of CT’s residents live along the coastlinewith an estimated \$405 billion in insured assets...”

The Nature Conservancy’s Coastal Resilience web portal

Moving Resiliency Policy Forward

Changing climate threats require updating local, regional, and state land use policies that refocus development in safer areas and – over time – reduce the built environment’s vulnerability in higher risk areas. Planners are at the forefront of revising local land use regulations and policy documents to ensure that they move the state forward towards a safer and more vibrant Connecticut.

- **Regionalize Disaster and Mitigation Planning.** Disasters are not limited to local political geographies and planners need to support broadening the discussion. Recent Regional Hazard Mitigation Plans and Coastal Resilience Plans completed by MetroCOG, Southeastern Connecticut Council of Governments, and the South Central Regional Council of Governments are great examples of positive collaborative planning. The Regional Plan Association (RPA) has recently also suggested a Regional Coastal Commission for resiliency planning for the tri-state area. The Coastal Commission may be one of many avenues to develop a dedicated funding stream and statewide system for project delivery.
- **Prioritize Infrastructure Investment.** Even absent future hazard risks, CT’s aging and outdated infrastructure needs serious attention. The State and municipalities need to do more than maintain legacy systems of infrastructure—roads, bridges, stormwater, sewers, and other utilities. In these political times with diminishing financial resources, agencies need to review the benefits and costs to maintaining infrastructure in areas that maybe not be accessible long-term due to rising sea level.
 - **Municipal Precedents** – The City of Meriden created a public green space that day-lighted the Harbor Brook and much-needed flood storage. The project has spurred additional downtown development and is a highlight for resiliency projects. http://www.meriden2020.com/Things_To_Do/meriden-green/. Likewise, the City of Bridgeport, working with the SAFER team, is addressing vulnerable public infrastructure in multiple locations <https://resilientbridgeport.com/>.
- **Include Habitat Protection and Regional Fisheries in Resiliency Planning.** Tidal marshlands are the region’s fishery nurseries and can only be located along our coastlines. As cited in recent collaborative work by The Nature Conservancy, marshlands also act as important buffers to break down wave energy during storm surge events. As seas rise, housing and other non-water-dependent land uses need to be relocated to accommodate marshland advancement and protect our regional fisheries and natural storm surge protection.
- **Protect Tax Revenue by Promoting Expanded Private Investment out of Future Flood Risk Areas.** SAFR’s recommendations (and current housing demand trends) support future economic development activity and alternative housing opportunities in Transit-oriented development areas and higher elevation town centers that are located out of the flood zone or inundation areas. Local zoning regulations need to be revised to support reinvestment in these areas.

- **Buffer High Risk Areas with Green Spaces and Greenway Amenities.** Reduce private risk in these areas by acquiring at-risk properties and creating public open spaces that can absorb flood waters and inundation while providing a community amenity and improving neighborhood quality of life.

Summary

The damage resulting from Irene and Sandy, coupled with the ongoing impacts of climate change and sea level rise, have collectively raised the profile of resiliency and the need for both private and public investment to address a myriad of impacts. In no uncertain terms, Connecticut faces many challenges due to Climate Change, but these threats also provide unique opportunities to improve our state’s quality of life and further economic development and housing goals while reducing future risk. CCAPA members have assisted in the development of sound planning and conceptual designs for coastal and inland resiliency. With the urgent need at hand, planners are ready to lead the discussion and facilitate efforts on program funding, regulatory alignment and the administrative capacity necessary to carry-out specific projects, particularly for public infrastructure.

ABOUT CCAPA AND THE “START WITH PLANNING” INITIATIVE

CCAPA members are deeply passionate about Connecticut and we play a key role in the development, transportation environmental protection of our common home. At this critical moment in the State’s history, CCAPA launched the Start with Planning initiative because we understand the dimensions of Connecticut’s challenges and we embrace a way forward built on core values, a pace of work and the “Team Connecticut” approach. With special attention to the interrelatedness of decisions, social equity and the long-range consequences of our current actions, CCAPA members are well-positioned to facilitate these important local and statewide conversations. For more information on this topic, email us at info@ccapa.org

REFERENCES

1. APA’s Naturally Resilient Communities Initiative - found at www.planning.org/nationalcenters/hazards/naturallyresilient/
2. The Nature Conservancy Coastal Resilience Web Portal for Connecticut - <http://coastalresilience.org/project/connecticut/>
3. A Report by the Governor’s Steering Committee on Climate Change, “CT Climate Change Preparedness Plan – Adaptation Strategies for Agriculture, Infrastructure, Natural Resources and Public Health Climate Change Vulnerabilities” – 2011
4. Regional Plan Association, “Coastal Adaptation: A Framework for Governance and Funding to Address Climate Change” – October 2017
5. Regional Plan Association, “Under Water: How Sea Level Rise Threatens the Tri-State Region – A Report of the Fourth Regional Plan” - December 2016
6. SAFR Connecticut Connections, US Department of Housing and Urban Development’s National Disaster Resilience Competition, “The State of Connecticut Phase II Draft Application for Public Comment,” – December 9, 2015
7. Southern CT Regional Council of Governments, the Nature Conservancy, and the CT Metropolitan Council of Government, “Southern Connecticut Regional Framework for Coastal Resilience – Final Report” – June 2017
8. US Environmental Protection Agency, “Flood Resilience Checklist” – July 2014



LUKE BRONIN
MAYOR

CITY OF HARTFORD
ADVISORY COMMISSION ON THE
ENVIRONMENT
 HARTFORD, CONNECTICUT 06103
WWW.HARTFORD.GOV



November 1, 2019

Commissioners

TO: Katie Dykes, DEEP Commissioner
 SUBJECT: Comments on Executive Order No. 3

Chair:

Kerri Provost

The Hartford Advisory Commission on the Environment (ACOTE) wholeheartedly supports the expanded scope and membership of the Governor’s Council on Climate Change (GC3) as promulgated in E.O. #. ACOTE is particularly sensitive to issues of equity and environmental justice, and thus, applauds DEEP on the proposed joint working group that will report to both the Mitigation and Adaptation/ Resilience Subcommittees on these cross- cutting issues.

Vice Chair:

Alex Rodriguez

Secretary:

Tom Swarr

ACOTE believes that grass roots organizations, such as itself, are critical enablers to ensure engagement of poor, urban communities in the planning, development, and implementation of adaptation and resilience strategies. Hartford’s residents live with the health impacts of extreme heat, tailpipe emissions, childhood asthma, flooding, and more. These impacts are aggravated by the lack of resources for residents to meet their basic needs. The City of Hartford has endorsed a climate action plan grounded in the values of economic development, public health, and social justice. Alignment of our actions with those at the state level is imperative to effectively and fairly prioritize climate change mitigation and adaption strategies.

Members:

JoAnne Bauer

Sam King

Mark Mitchell

Edith Pestana

ACOTE feels strongly that it should have an active role working with and supporting the Joint Workgroup on Equity and Environmental Justice. The on-ground support of local advocates is a critical success factor in developing a regional approach that benefits all of New England.

Staff:

Shubhada Kambli

ACOTE looks forward to supporting DEEP and GC3 in building a low carbon future that is inclusive, healthy and prosperous.

Respectfully submitted,

Kerri Provost
 Chair, ACOTE



Luke A. Bronin
Mayor

CITY OF HARTFORD

Office of Sustainability

550 Main Street, Room 300
Hartford, CT 06103
Email: Sustainability@Hartford.gov
Telephone: (860) 757-9731



Shubbada Kambli
Sustainability Coordinator

Commissioner Katie Dykes
Connecticut Department of Energy & Environmental Protection
79 Elm Street Hartford, CT 06106

November 15, 2019

Dear Commissioner Dykes,

Thank you for the opportunity to offer input on Executive Order 3. The City of Hartford strongly recommends the engagement of diverse stakeholder groups throughout the climate planning process led by the Governor's Council on Climate Change. We therefore appreciate two key questions that the Council is considering, including:

- *How will we ensure diverse stakeholders are engaged throughout the planning, development, and implementation of adaptation and resilience strategies?*
- *How can we prioritize climate change mitigation and adaptation strategies that protect vulnerable communities disproportionately affected by the impacts of climate change?*

As it relates to the thematic areas of the working groups, we strongly support the creation of a working group dedicated to equity and environmental justice. In addition, we ask that you consider the GC3's objectives and deliverables not just by soliciting feedback from residents, nonprofits, businesses, and local leaders, but by organizing the process in such a way that allows stakeholders - including our most vulnerable and underrepresented residents - to lead the way. This may mean appointing and training youth and community ambassadors, and offering leadership training concurrently with the GC3 meetings in partnership with grassroots organizations.

Critically, we would like to see the equity working group address the fact that Connecticut has the third highest residential electricity prices in the country, behind Hawaii and Alaska. Given how high household utility bills can be, we also believe it is critical for the GC3 to act on transparency regulations that require landlords to share utility bill data with renters before lease. This would protect our most vulnerable residents from unexpected energy bills that contribute to a cycle of poverty. These types of regulations would also transform the housing market by creating an environment in which knowledge empowers the consumer to make energy-efficient choices that support reduced household costs.

Energy efficiency standards and transparency regulations would also address the "split incentive" issue, where a landlord won't pay for energy upgrades because the tenant pays the bills. With additional transparency, consumers can make choices that drive improvements in the residential housing stock.

To further address root causes of environmental injustice, income inequality, and inequity, we also ask the Council to think about a working group that considers a pathway to work in the energy sector. This may include training through debt-free community college or other course of study. In this way, the GC3 can use current and future legislation and programs to create a level playing field for opportunities in the environmental field.

In Hartford, we have already seen exceptional local environmental businesses settle here; and we know that state policies, regulations, and standards can help ensure that all residents are ready for work in a green and circular economy. We would like to ensure that the educational standards upheld by the state are aligned with the market, allowing residents to be educated, trained, and employed in Connecticut.

We therefore ask that the GC3 consider modifying the name of the Equity and Environmental Justice working group to Equity, Education, and Environmental Justice.

For additional working group themes, we are hopeful that the measures outlined by the Governor's Council on Climate Change will result in market transformation, and encourage a new class of entrepreneurs and businesses to grow and set up shop in the state.

Towards this end, we also advocate for ensuring that minority-owned and women-owned businesses benefit from state-level policies and regulations by including set-asides or similar considerations for these businesses.

We would also like to see green and equitable jobs as an area of focus under a specific working group entitled Market Transformation.

Again, thank you for the opportunity to offer input on Executive Order 3, and we hope the GC3 will consider these recommendations.

Sincerely,



Shubhada Kambli

Sustainability Coordinator

From: Colin Cogle
Sent: October 28, 2019 1:37 AM DEEP
To: ClimateChange
Subject: Comments on Executive Order 3

This is wonderful... if it were the twentieth century. We can do more!

For starters, why in a god's name are we building a gas plant in Killingly to poison Rhode Island's air and spew out carbon and methane? As a resident of New Milford, I'm getting ready to breathe Dover's gas plant emissions for the next thirty years. Ban all non renewable energy sources immediately and put your money where your mouth is!

This order should also identify emissions targets for buildings, construction, agriculture, and public transit. The latter is better than cars, but it's not yet carbon neutral. (Until our electric trains run on Connecticut's solar farms...)

Finally, why wait until 2040? We have only a few years before we reach the next global CO2 threshold. Target 2020, 2025, or at latest 2030. We're a smaller and nimble state. We can reach our climate goals quickly and set an example for the rest of the country and world.

While this is a good step forward, if we want to win the race against time, I suggest we start sprinting.

—
Colin Cogle
New Milford, CT



40 Clifford Street, Hartford, CT 06114 * Ph: 860-692-3066 * fx: 860-692-3068 * Web: ccfj.org

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

November 5, 2019

Dear Commissioner Dykes,

We write from the Collaborative Center for Justice, a faith-based social justice advocacy organization here in Connecticut. We are sponsored by six Congregations of Women Religious in the state. Environmental justice and care for the environment are priority issue areas in our education and advocacy work. Thank you for the opportunity to comment on Governor Lamont's Executive Order 3.

We applaud the Administration's commitment to addressing climate change through considering mitigation strategies, as well as adaptation and resiliency strategies. We commend that your Executive Order emphasizes the prioritization of climate change adaptation efforts to protect vulnerable communities. We fully support the approach of convening working groups made up of diverse stakeholders.

We believe it is critically important to include voices of people who are most effected by environmental degradation and climate related impacts, including people who are poor and communities of color, in various capacities in the Council. Specifically, in the Equity and Environmental Justice Joint Working Group, we recommend including at least one directly impacted person within this group. We support your intention that this group will engage with a diverse group of stakeholders, and we believe that a key component of achieving this goal is to ensure that people who are directly impacted have a seat at the table.

We hope that projects undertaken to ensure a sustainable future for Connecticut will not exacerbate already-existing inequalities. All plans for large projects should reflect a commitment to supplier diversity, as well as equity in hiring and the awarding of state contracts. As of September 2019, the City of Hartford's [unemployment rate](#) was nearly twice that of the state. Future projects can and should be used to ameliorate that problem.

In addition to high unemployment, Hartford also has some of the unhealthiest air in the state of Connecticut, which itself has some of the unhealthiest air in the country. According to the American Lung Association's 2019 "[State of the Air](#)" report, the Hartford-East Hartford area had the 23rd worst frequency of high ozone days among major cities. That puts this community on the frontline of the climate crisis in the state and should, therefore, put it at the frontline of the solution. To be clear: Governor Lamont should commit to beginning impact mitigation efforts in communities most vulnerable to the impacts of climate change and overall environmental degradation.

Daughters of the Holy Spirit * Daughters of Mary of the Immaculate Conception * Sisters of St. Joseph of Chambery * Sisters of the Congregation de Notre Dame, Blessed Sacrament Province * Sisters of Mercy of the Americas * Northeast Community * Sisters of Notre Dame de Namur of the United States East-West Province

To accomplish this, the Commission should publicize its plan to engage diverse stakeholders. The state's commitment to doing so, while important, is not enough. There must be concrete steps to ensure that otherwise marginalized communities can participate in this process. For instance, meetings and townhalls can be held in houses of worship in communities of color, and other poor and working-class areas.

In order to reach our climate related goals, Connecticut needs to increase renewable energy procurements, including from wind and solar. We believe that community solar opportunities should be expanded so that more people across the state, particularly low-income communities, have access to participation in a project.

We urge you to halt all plans to expand or create new fossil fuel projects, such as the planned fracked-gas plant in Killingly. Building a new natural gas power plant would move the state further away from our goal of cutting greenhouse gas emissions to 45% below 2001 levels by 2030, and achieving a 100% zero carbon target for the electric sector by 2040. To address reliability concerns, the state should expand investment in energy storage capabilities and increase renewable energy projects across the state.

The creation of a new natural gas power plant would also be in tension with the recently passed permanent statewide ban on fracking waste. This legislation passed unanimously in the Senate and almost unanimously in the House, and thus was widely supported by residents across the state. Awareness of the harms caused by the hydraulic fracturing process, and the toxic waste and byproducts it creates, has grown over the past few years. Expanding fracked-gas operations in Connecticut seems at odds with the facts and concerns that led to passage of legislation to ban fracking waste. Beyond the carbon emissions of such a plant, we are concerned about the serious potential for gas leaks, which would release the powerful greenhouse gas methane into our air and soil.

Efforts to increase energy efficiency in buildings and homes should also be prioritized. We recommend an increase in funding for financial assistance programs for low-income households to make energy efficiency improvements to their homes. Outreach to low-income communities about the benefits of such improvements, and the assistance to complete them, would be important to ensure effective implementation.

We appreciate your commitment to achieving the bold climate goals laid out in Executive Order 3, and the previously released report Building a Low Carbon Future for Connecticut: Achieving a 45% GHG reduction by 2030. We look forward to working with the Lamont Administration and other stakeholders to make Connecticut a leader in addressing climate change with bold, just, and inclusive strategies.

Sincerely,

Dwayne David Paul – Director

Rachel Lea Scott, MSW – Associate Director

From: [Leticia Colon](#)
To: [DEEP ClimateChange](#)
Subject: Comments on GC3
Date: Friday, November 08, 2019 6:03:31 PM

To whom it may concern,

Please find these brief comments regarding equity, diversity, and affordability. We have a deep interest in mitigation planning.

In order to develop a robust stakeholder process we suggest you appoint additional representatives from the diverse public sector of our state. There must be an effort to connect these criticality important planning processes to the residents of our state.

There must be increased focus on serving low income communities with resources that will lower their energy burdens. This could be increased training for potential efficiency or clean energy jobs, and support for expansion of services which lower energy waste/costs/ carbon.

Often the state programs result in support for communities which already have resources. Therefore it is important to include a low income representative on your committee.

Mitigation strategies are complex and there is value in selecting an active EnergizeCT building scientist on the Council. This would help end the silos and increase collaboration between existing resources.

Additionally, it is important that we not get held up on progress when there are immediate actions that could begin to mitigate our carbon emissions. We must take steps to implement the solutions we have while we develop additional opportunities for carbon mitigation.

As a member of the National Building Performance Alliance, I have the benefit of access to current federal policy platforms and data on climate action. These tools would be useful in planning our path to carbon free energy in our state.

I note that the Ex 3 order does not clearly identify the additional groups or appointments. This should be clarified.

We also suggest the addition of a youth representative. This will be their burden to carry and it would be an amazing opportunity for a youth to participate in the planning and communicate the plans to other students and interested youth.

Respectfully,

Leticia Colon de Mejias
www.encyforall.org



November 8th, 2019

Commissioner Katie Dykes
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Dear Commissioner Dykes:

The Connecticut Audubon Society protects Connecticut's environment by inspiring conservation action. We connect people to birds, other wildlife and their habitats through facilitating research, education, habitat improvement and environmental advocacy. We commend Governor Lamont on the signing of Executive Order #3 to expand the scope of the Governor's Council on Climate Change, particularly with regard to the development of a climate adaptation strategy that assesses and prepares Connecticut for the impacts of climate change. We strongly believe that bold action is required to address the growing threat to our wildlife and habitats from the effects of climate change.

We are heartened to see that the Connecticut State Wildlife Action Plan (SWAP) is referenced in this document. This important plan provides a road map to keeping Connecticut's common wildlife species common and attempting to reverse ongoing declines of threatened wildlife species. A key strategy for wildlife conservation in the face of climate change is to ensure that habitats and wildlife populations remain as robust as possible in order to offer more resilience to the disruptive effects of a changing climate. This requires active management of both wildlife species and the habitats they require. As such, we hope that the members of the council, subcommittees and working groups and the State of Connecticut will join with us in doing everything possible, including working with other states, to ensure the passage of the Recovering America's Wildlife Act in Congress. This ground-breaking legislation would greatly increase federal funding to implement the SWAP and would result in an increase of federal funding for wildlife conservation in Connecticut by more than \$12M annually. This funding will be essential to implement our SWAP and ensure that wildlife and habitats are as robust as possible in the face of climate change. Similarly, we commend the reference to the Connecticut Forest Action Plan, which is currently in the process of being revised and will provide an important blue print for the continued health of our state's forests.

Open space protection is another essential tool in both mitigating and adapting to the effects of climate change. As such it is critical that we continue and accelerate our progress toward the goals outlined in Connecticut's Green Plan. Undeveloped open space and farmland provide important carbon sinks and the protection of large blocks of habitat provides for more resilience for those habitats and the wildlife that depend upon them. Continued development of natural spaces not only fragments the habitat landscape but also converts carbon sinks in to carbon sources, as new structures are built and more transportation and energy transmission infrastructure is required to support the additional development. It is critical that Connecticut accelerates our efforts to protect open space and to achieve the goals set forth in the Green Plan.

The ecological effects of rising sea levels are among the most urgent threats we face from climate change. Our coastal and riverine habitats allowing for landward migration of critical marshes and beaches must be prioritized in these efforts, as such habitats are essential to the health of Long Island Sound, our rivers and the economy of coastal Connecticut. For them rising sea levels and storm surge are among the most critical and urgent threats we face from climate change.

Additionally, like the above mentioned Recovering America's Wildlife Act, the Land and Water Conservation Fund Permanent Funding Act, currently in Congress, will be an essential tool in helping us to achieve our open space goals and we hope the State and members of the Council and working groups will join us in supporting its passage.

We also hope that strong environmental reviews and protections will remain for the development of renewable energy production capacity. While we understand the need to transition from carbon-based energy to a renewable portfolio, such projects are commercial ventures and the same environmental protections should apply to their siting and development as would proposals for other energy production facilities. Proper siting of such facilities and their associated maintenance and transmission infrastructure is essential to ensure that these projects do not cause more harm than good to our critical habitats and the wildlife they depend upon them.

Lastly, but not insignificantly, we also strongly feel that public education on the effects of climate change is essential. A citizenry, including school children, educated about the threats we face from climate change is critical in the development of societal will to make the difficult but necessary decisions required to mitigate against and adapt to the effects of climate change on our landscape. As such, we ask for your continued support of a climate change education requirement for all public schoolchildren in our state. While recent attempts at passing such a bill did not pass in the Senate, it is our hope that the substance of the most recent bill (HB 7083) will become a reality under your leadership.

Thank you for the opportunity to provide comments on this important executive order. We would welcome the opportunity to participate in any of the working groups related to habitats, wildlife and conservation of our coastal resources.

Sincerely,



Patrick M. Comins, Executive Director

From: [Tom Crider](#)
To: [DEEP ClimateChange](#)
Subject: Governor's Exec. Order 3
Date: Friday, November 08, 2019 12:55:39 PM

Dear Commissioner Dykes:

As a local land trust in Connecticut, our mission is to preserve the 2,200A of land that we either own or have conservation easements on in perpetuity. Thus we believe we can be important partners in developing and implementing climate mitigation strategies.

We look forward to partnering with the State in implementing Gov. Lamont's Order No. 3.

Thank you,

Tom Crider, Vice-President
Southbury Land Trust

From: [Alice Cruiks](#)
To: [DEEP ClimateChange](#)
Subject: Zero Carbon
Date: Wednesday, October 30, 2019 2:24:20 PM

We must be responsible to the next generation & switch to electric power.

Thank you.

Alice Cruikshank

Bloomfield

Sent from my iPhone



CONNECTICUT COUNCIL ON SOIL AND WATER CONSERVATION

November 8, 2019

Katie Dykes, Commissioner
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Re: Comments on Governor Lamont's Executive Order No. 3
Recommendation to form Soil Health Subcommittee/Workgroup

Dear Commissioner Dykes,

As the Chair and the Executive Director of the CT Council on Soil and Water Conservation (Council), we are pleased to submit the following comments to Governor Lamont's Executive Order No. 3. Specifically, we are recommending the formation of a Soil Conservation Subcommittee/Workgroup under the Working and Natural Lands Committee and that the Science and Tech Committee include a representative with extensive knowledge of soils as a natural resource.

The Council was established under section 22a-315(c) of the General Statutes during the 1940's as part of the national response to the dust bowl era. It was set up to provide leadership and guidance to you, as Commissioner, on all matters relating to soil and water conservation. The Council also has oversight of Connecticut's five conservation districts and works in coordination with the USDA Natural Resource Conservation Service and the CT Resource Conservation and Development Council as part of the Conservation Partnership. We fully support E.O.3 and the strengthening of Connecticut's commitment to transition to a decarbonized economy and enhance the state's resiliency to the impacts of climate change.

Soil is one of the largest *sinks* for atmospheric carbon, and one that can be managed to mitigate the effects of climate change and decrease the pace of global warming. Improving soil health in agricultural fields, forests and urban open space (fields, parks, urban gardens, lawns) increases atmospheric carbon sequestration and reduces emissions. Soil health is achieved through practices that prevent erosion, increase water infiltration rate and water holding capacity, increase organic carbon content, nutrient content, biological activity and biological diversity. By improving the health of the soil, the effect on reduced emissions and carbon sequestration can be quantified and compared to reducing cars on the road, for example. These effects can be measured using the USDA's Nutrient Tracking Tool and other methodologies.

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203-424-8469
ctcouncilswc@gmail.com

Soil health is also intimately related to water quality and quantity. Soil erosion causes sediment accumulation in lakes and rivers, and water runoff brings nutrients and chemicals that alter the quality of the water and affects all life that depends on it. Healthy soils can retain more water and make it available to plants in any type of land cover, reducing the need for irrigation. Reducing losses by soil erosion and runoffs reduces the need to for application of nutrients, which is even more critical with warming waters which are causing algal blooms and depleting wildlife.

The economic benefits of soil health can be measured at the farm gate in the form of increased and stable yields, lower use of inputs and energy, and increased crop resistance to drought due to increased water and nutrient retention in healthy, well managed soils. Beyond the farm gate, the economic benefits of soil health can be measured in the lower cost of maintenance and treatment of water services and natural water systems. Food security is better achieved in healthy soils, decreasing logistical and carbon footprint costs of transportation, as local food production is more sustainable and stable.

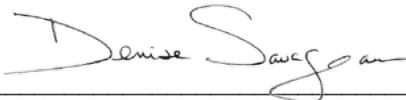
At present, only one section of the CT General Statues addresses soils- SOIL CONSERVATION (TITLE 22a)- despite its critical importance for the ecology and economy of the state. The CT Council, charged with bringing together all state and federal agencies related to soil, is in the process of updating this section to include *soil health*, not just erosion, and bringing the importance of soil as a natural resource to the forefront. Our key partner in the Conservation Partnership, the USDA NRCS, is national leader on soil conservation.

Soil health is not just an issue impacting agriculture and forestry. It is also related to urban development, particularly in Connecticut with its population density and significant land area intensively dedicated to lawns, fields, parks and urban agriculture. Consequently, soil health is a concern that deserves ample representation, not restricted to the Department of Agriculture.

For that reason, the Council recommends the creation of a SUBCOMMITTEE ON SOIL under the section on Working and Natural Lands, to be led by the CT Council/USDA and including, at a minimum, the DEEP, DOA, UConn, and CT Ag Experiment Station. We further recommend the inclusion of a member with extensive knowledge of soils as a natural resource on the Science and Tech Committee.

For additional information or questions concerning these comments, please contact Lilian Ruiz at 203-424-8469.

Respectfully submitted,



Denise Savageau, Chair



Lilian Ruiz, Executive Director

Cc: Thomas Morgart, State Conservationist for CT, USDA NRCS
Brian Thompson, Director Land and Water Resources Division, DEEP;
Richard Jacobson, Chief of Bureau of Natural Resources, DEEP



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November 8, 2019

Commissioner Katie Dykes
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

Dear Commissioner Dykes:

Thank you for the opportunity to submit comments on Governor Lamont's Executive Order No. 3 (E.O 3) strengthening Connecticut's commitment to transition to a decarbonized economy and enhance resiliency of the state's economic, cultural, and natural resources to the impacts of climate change.

The Connecticut agricultural industry contributes \$4.0 billion dollars to the state's economy and supports over 21,000 jobs. Connecticut's geographical area is approximately 3.2 million acres of which 440,000 acres is comprised of working farmland which includes agricultural fields, wetlands, ponds and woodland. Connecticut's forests cover 1,799,342 acres of land. In total, working farmland and forestland comprise 70% of Connecticut's geographical land base.

Connecticut's working agricultural land contributes to carbon sequestration, clean water, clean air, open space, protection for wetlands and riparian areas, wildlife habitat, and resiliency to climate change which benefit all citizens in the state of Connecticut. Maintaining and enhancing this working land base through initiatives that benefit the farming economy and help preserve working farmland is a critical cornerstone to mitigating the impacts of climate change in Connecticut.

Membership of the Governor's Council on Climate Change (GC3):

Executive Order No. 3 expands the membership of the GC3. In 2015 Governor Malloy signed Executive Order 46 establishing a new Governor's Council on Climate Change (the Council). Appointments to that Council did not include representation from agriculture and working lands. Connecticut Farm Bureau Association recommends an appointment to the expanded GC3 to include representation from the agricultural sector.

Implementation Process:

Farmers, non-profits representing the agricultural sector, and agriculture service providers should be invited to participate in any sub-committees or working groups formed under the Governor's Council on Climate Change.

Joint Working Groups (Mitigation and Adaptation/Resilience Subcommittees)

Science and Technology: Advances in soil health initiatives, farming practices, conservation planning and on-farm renewable energy projects can all contribute to mitigating the impacts of climate change. The science and technology to support these innovations should be included in actionable items.

The Voice of Connecticut Agriculture

Equity and Environmental Justice: Sourcing food from local farms, support for urban agriculture, and local food hubs all contribute to reducing the transportation of food to underserved communities. Reducing transportation of food by supporting a local food sourced economy aids in climate mitigation and resilience.

Working and Natural Lands: Maintaining and enhancing Connecticut's agricultural working land base and a robust agricultural economy is critical to mitigating climate change and building resiliency. Funding for the Community Investment Act (CIA) which has successfully supported the Farmland Preservation Program, DEEP's Open Space Acquisition Fund and the Dairy Support Program should be fully funded. Funds should remain in the CIA to support the programs for which they were intended. The Connecticut Farmland Preservation program has helped permanently protect 44,500 acres and 370 working farms. Connecticut has been able to leverage federal and local funding to help preserve working farmland. Obstacles to the expeditious closing of projects should be identified and eliminated. Reaching the long-term goal of protecting 130,000 acres of working farmland will help mitigate climate change.

Adaptation Working Groups

Financing Adaptation: Provide incentives and eliminate roadblocks for on-farm energy projects such as anaerobic digesters and small scale, state of the art biomass heating systems. These projects will assist in mitigating greenhouse gas emissions while addressing disposal of farm, food, and wood waste. Energy from these state-of-the-art facilities will help reduce farm input costs while assisting in diversifying farm revenue.

Provide low interest loans or grants to farms to incentivize investments in technology and on-farm practices to improve soil health, water conservation practices, replace and upgrade to high efficiency energy systems and other practices that will reduce emissions and help sequester carbon.

Mitigation Working Groups

Connecticut agriculture and the contribution it makes to mitigating climate change should be considered in all strategies to meet the goals and objectives of E.O #3.

Connecticut farmers are astute and forwarding thinking stewards of hundreds of thousands of acres of working land. Their insight and compassion for the land and their ability to adapt in a rapidly changing economic and environmental climate make them ideal candidates for providing practical and thoughtful recommendations into policies and initiatives to combat the challenges of climate change.

We look forward to working with the Department of Energy and Environmental Protection and the Lamont Administration in advancing climate change initiatives and strategies now and for future generations.

The mission of the Connecticut Farm Bureau is to elevate the stature of agriculture in our state. Through education, market promotion and legislative advocacy, we strive to increase farm income and to improve the quality of life not only for Connecticut farmers, but also for their consumers. Celebrating 100 years in Connecticut and representing nearly 3,000 farming families.

Respectfully submitted,



Joan Nichols
Executive Director and
Director of Member Relations



Connecting people to the land since 1895

16 Meriden Road
Rockfall
Connecticut 06481-2961
Tele: 860-346-TREE
www.ctwoodlands.org

November 7, 2019

Commissioner Katie Dykes
Connecticut Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106

Dear Commissioner Dykes,

Thank you for this opportunity to provide public input on Governor Lamont's Executive Order No. 3.

As you know, the Connecticut Forest & Park Association (CFPA) is the oldest non-profit conservation organization in Connecticut (established in 1895), and has a mission to connect people to the land to protect forests, parks, walking trails, and open spaces for future generations to enjoy. Climate change is impacting all of CFPA's mission priorities, and the protection of natural resources such as forests can help to sequester "negative emissions." So, we have significant interest in the work of the Governor's Council on Climate Change in planning for, investing in, and integrating adaptation, resilience, and mitigation actions for Connecticut.

Our comments on the scope of your framing questions, and on the working group thematic areas follow:

Comments on Scope of the GC3 Framing Questions

- *Building a Low Carbon Future for Connecticut* suggests that "As much as possible, Connecticut should pursue an integrated approach to mitigation, adaptation, and resiliency." (p. 21) And so, we would suggest that all of the framing questions and the title of the section be altered to include all three strategies. Currently, the section is entitled "Developing a Framework for Adaptation & Resilience," and this is confusing since there are several framing questions that either do or should also include reference to mitigation strategies (Questions 3, 6, and 7).
- Question 4 references "vulnerable communities" and should probably also reference "and ecosystems" similar to how these concepts are combined in Question 2.
- Question 6 notes federal, state, regional, municipal, and local adaptation efforts. Rather than "local" (which is often synonymous with municipal) do you mean "private"?
- Question 7 references "investment" and we would add "or other incentives" since there may be tax deferment or other strategies short of investment that may help.
- An additional question could address the need to effectively communicate the findings of the GC3 to the public, e.g., "How should the findings of the Council be communicated to the public to encourage actions that support and extend the most important mitigation, adaptation, and resilience strategies?"

Comments on Working Group Thematic Areas and Organization

- It is hard to know by looking at the simplified organizational chart where the "real work" of the GC3 is expected to take place. If you envision substantive work taking place at the Subcommittee level, then some of the Working Groups that only report to one Subcommittee can be subsumed and simply incorporated as part of the charge to that Subcommittee. This would result in incorporating the Assessing Vulnerabilities, Financing Adaptation, Adaptation Planning and Implementation, and Progress on Mitigation Strategies working groups. This would simplify the GC3 structure and likely be easier for DEEP to efficiently manage.

- At the same time, it does make sense to keep the Working Groups that report to both the Mitigation and Adaptation/Resilience Subcommittees.
- Equity and Environmental Justice should be fundamental considerations that apply across the GC3's priorities, and it is not clear that establishing a separate Working Group on equity and environmental justice issues would accomplish that goal. Alternatively, we would hope that inviting stakeholders of underrepresented communities onto the Mitigation and Adaptation/Resilience Subcommittees directly would result in the most genuine opportunity for substantive input on equity and environmental justice issues into the recommendations of the Governor's Council.
- The description of the Mitigation Working Group on "Progress on Mitigation Strategies" uses the word "prioritize" in a way that seems to be problematic. "Prioritize" seems to suggest that the equitable distribution of costs and benefits is more important than the "efficacy of existing and proposed policies at reducing GHG emissions." Would we really prioritize equity over effectiveness? To avoid this potential conflict, I would recommend using "analyze" rather than "prioritize" in this description.
- It isn't clear where recommendations on certain issues that may "crosscut" the transportation, energy, housing, and natural lands sectors might fit into the structure of the GC3, for example:
 - Connecticut should promote locally-grown food and sustainably harvested wood products to reduce transportation fuels/emissions/food miles and sequester carbon in long-lived wood products such as wood flooring in building construction or renovation; or
 - Connecticut should consider more public transportation options to connect people to State Parks, Forests, and Wildlife Management Areas (taking cars off the road, encouraging more equitable accessibility to public lands for people who may not own or who prefer not to use cars, improving public health by adding connections to nature, encouraging TOD development, etc.).

If you have any questions about any of these comments, please follow-up with me via chammerling@ctwoodlands.org or 860/346-TREE.

Sincerely,



Eric Hammerling, Executive Director
Connecticut Forest & Park Association (CFPA)

CONNECTICUT
Land Conservation Council

November 7, 2019

Sent via email: DEEP.ClimateChange@ct.gov

Commissioner Katie Dykes
Connecticut Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106

Re: Comments on Governor Lamont's Executive Order No. 3

Dear Commissioner Dykes,

On behalf of the Connecticut Land Conservation Council, thank you for this opportunity to submit comments on Executive Order No. 3 (E.O.3) and its implementation by the Governor's Council on Climate Change (GC3).

As the state's umbrella organization for the land conservation community, including its ~137 land trusts, the Connecticut Land Conservation Council (CLCC) advocates for land conservation, stewardship and funding, and works to ensure the long-term strength and viability of the land conservation community in Connecticut.

Connecticut is ranked third in the country behind California and Massachusetts as having the highest number of land trusts. Almost every town in Connecticut has a land trust; some are staffed but most are all-volunteer. Their service areas range from single-town, to regional -- serving multi-towns -- to statewide.

Connecticut land trusts are critical private partners with which the state may pursue and maximize natural climate solutions -- including the development and implementation of careful forest, agricultural, grasslands, and wetlands policies and protections. With a mission to conserve and protect land *in perpetuity* -- Connecticut's land trust community is thus an essential stakeholder in the state's process to develop and implement climate mitigation strategies.

On behalf of Connecticut's land trust community, CLCC is pleased to submit the following comments on the two questions set forth in the Notice of Request for Public Input (Request), to help inform the approach of the Governor's Council on Climate Change (GC3):

Question 1: Comment on the scope of the framing questions for adaptation and resilience. Should any of these questions be omitted or reframed? Are there any additional questions that should be asked?



CLCC Response:

- **Reference to mitigation:** Recognizing the distinct and important roles that adaptation, resilience, and mitigation strategies each play in formulating the state’s climate change policies and practices, and in order to accurately reflect the proposed GC3, subcommittee, and working group structure as set forth in the Request, we recommend reframing questions 3, 6 and 7 to include reference to “mitigation” in addition to “adaptation and resilience.”
- **Include Public/Private Partnerships:** Considering the critical role that land trusts and other private landowners play in addressing climate change, we suggest adding a question that examines opportunities for public/private partnerships and their value in maximizing impacts and benefits related to adaptation, resilience, and mitigation strategies.

Question 2: Comment on the working group thematic areas, as they contribute to the tasks set forth in E.O. 3. Recognizing the resource limitations on managing multiple working groups, should the scope of any of the proposed working groups be adjusted, or supplemented?

CLCC Response:

- **Appoint working and natural lands stakeholder representatives on the GC3 subcommittees:** We agree that it is vital to the process to have an ad hoc Working and Natural Lands Working Group. We also support its proposed role to serve both the Mitigation and Adaptation/Resilience Subcommittees.

However, we contend that, in light of the critical role that land and other natural climate solutions (core and old growth forests, watershed lands, wetlands and vernal pools, healthy soils, etc.) play in addressing climate change impacts, at least one representative from one or more land conservation organizations should serve on each of the GC 3 subcommittees.

As a subcommittee member, the land conservation representative will be in the best position to provide consistent input and guidance in formulating objectives and deliverables specifically with respect to natural climate solutions as well as assistance in defining, directing, and managing the tasks and “time limited” work assigned to the working group.

- **Scope of the Working and Natural Lands Working Group:** While we support the overall scope of the working group as described, we recommend its evaluation “of the role of nature-based solutions in climate change mitigation and adaptation” include, at a minimum, the following strategies and policies:
 - Increase investments in existing land conservation and farmland preservation programs including the Open Space & Watershed Land Acquisition Grant

Program, Recreation and Natural Heritage Trust Program and Farmland Preservation Program.

- Commit to full funding for the Community Investment Act.
- Recommend policies to enable municipal funding options for land conservation, stewardship, farmland preservation, and natural climate solutions.
- Recommend tax incentives to encourage private land conservation including for associated increases in negative carbon emissions.
- Establish public/private partnerships to create new programs and enhance efficiencies in existing programs.
- Set a significantly higher state land conservation goal, including the setting aside of a certain percentage of public lands as preserves and intact wildlife corridors.
- Quantify how much our public lands can contribute to the goals of zero-carbon emissions by 2030, and evaluate the impacts of public lands management practices, including logging and other tree removal, on carbon emissions and carbon storage as well as on wildlife, water and air quality.
- Increase reforestation and afforestation where appropriate and prioritize the preservation and protection of the remaining primary and intact forests that store carbon and are essential to efforts to decrease the loss of habitat and biodiversity (proforestation).
- Recommend incentives for agricultural practices that decrease carbon emissions and increase carbon sequestration.
- Create incentives to replace fossil fuels with low carbon renewables and other cleaner energy sources in a manner that does not undermine land conservation goals and benefits.
- Estimate the emissions avoided by the transportation sector associated with increases in locally grown food and long-lived wood products coming from Connecticut farms and forests.

Thank you again for this opportunity to provide these initial comments regarding the implementation of Governor Lamont's Executive Order No. 3. CLCC and Connecticut's land conservation community stand ready to actively participate in this process moving forward, while there is still time to make a difference.

Sincerely,



Amy Blaymore Paterson, Executive Director



October 29, 2019

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm St
Hartford, CT 06106

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3 to strengthen Connecticut's commitment to a decarbonized electric grid and support our state's efforts to combat climate change. We at the Connecticut League of Conservation Voters (CTLCV) are excited to see the administration setting bold goals in the face of the looming threat of our climate crisis.

Governor's Council on Climate Change

As part of Executive Order No. 3, Gov. Lamont indicated he would expand and strengthen the Governor's Council on Climate Change (GC3). The original GC3 was instrumental in setting Connecticut's carbon reduction goals, but that is not to say it is beyond improvement. Advocates including CTLCV were quick to indicate that many important voices were not included on the GC3. We hope to see that rectified here.

CTLCV strongly recommends 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. These groups often face the brunt of pollution and climate change, but they are often left out of decision-making processes aimed at addressing these issues. If the GC3 is to truly offer guidance on addressing the impact of climate change, it must first have a full accounting of those impacts from communities that would feel them most potently.

Decarbonizing Our Electric Grid

CTLCV also applauds the Executive Order's directive to decarbonize our state's electric grid. That is a laudable goal, and one we hope to see reflect Governor Lamont's pledge to transition our state to 100% clean energy.

There are many pathways to a zero-carbon future, but the clearest is a commitment to clean energy. Connecticut's recent procurement of 2,000 MW of offshore wind energy is a fine start, representing roughly a third of our state's energy needs. However, we must be prepared to meet our Renewable Portfolio Standards goals of 40% clean energy by 2030. We should also plan for the potential decommissioning of the Millstone Nuclear Power Plant in the next ten years. Millstone represents a third of our energy needs, and is currently the largest provider of zero-carbon electricity in the state. If Connecticut does not put a plan in place now, we could be forced to turn to fossil fuels like fracked gas to meet our energy needs. That is not in keeping with Executive Order No. 3 or our previous commitments.

CTLCV strongly opposes investments in fossil fuels—such as the new fracked gas power plant planned in Killingly. This power plant would not be in keeping with the Governor's zero-carbon proposal, nor would it help us lower carbon emissions. While we recognize the need for reliable energy even when the

wind is not blowing or the sun is not shining, CTLCV urges Connecticut to invest instead in energy efficiency and battery storage. By both decreasing the amount of energy we use and investing in new ways to store electricity, we can ensure reliability even during peak times without turning to fossil fuels.

These investments in energy efficiency should include equal access to programs, regardless of heating fuel type. Connecticut should also seek to expand access to energy efficiency programs by considering ways to implement automatic enrollment. For instance, households eligible for SNAP, WIC, or HUSKY benefits could be automatically enrolled in our energy efficiency programs. Not only would this reduce the draw on our electric grid, it could reduce the cost of electricity for the roughly 400,000 households struggling to pay their energy bills.

CTLCV also encourages Connecticut to increase its clean, renewable energy procurements. Massachusetts, Rhode Island, and other New England states have begun construction on their own offshore wind facilities. We could look for ways to partner with the other states of ISO New England to issue a joint procurement of offshore wind, thus driving costs down while ensuring we can all meet our energy needs.

Additionally, Connecticut should increase its investments in solar energy, particularly shared solar programs for those who live in apartments, condos, or other facilities where traditional rooftop solar panels would not be feasible. Currently, our community solar program is burdened by overly restrictive rules such as preventing unused energy from rolling over to subsequent years. There are also restrictive caps on the amount of solar energy participants can procure. Connecticut should loosen the reins on community solar to allow this program to expand, giving more households the chance to tap into clean energy and potentially lower their costs.

Investments in clean energy are certainly important, but further funding for resiliency and carbon sequestration are equally critical, but funds for land conservation are often the first to be raided in times of budget shortfalls. Forests and open space act as critical carbon sinks. Connecticut should stop diverting funds from programs like the Community Investment Act to ensure we can protect our forests from development.

Furthermore, we must ensure our towns and communities—particularly on our vulnerable coastlines—have the resources they need to make necessary upgrades and improve natural buffers. Hurricanes and superstorms have ravaged Connecticut in the past. Climate change ensures these storms will hit again, and the damage could be catastrophic. It is much more cost-effective to invest in resiliency now rather than major repairs in the wake of a superstorm.

Connecticut must also think of the broader picture. To fight climate change and build a zero-carbon future, we must be prepared to take bold action. There are a myriad of goals we could set and programs we could expand, including:

- Setting strict energy efficiency standards for buildings to reduce emissions, lower their draw on the electric grid, and reduce energy costs for us all;
- Informing households about energy efficiency upgrades and best practices;
- Creating a Residential Property Assessed Clean Energy (R-PACE) program to assist low-income households with financing energy efficient improvements;
- Increasing our Renewable Portfolio Standard to 100% clean energy by 2050 or sooner;
- Electrifying a greater percentage of our mass transit—including school buses;
- Banning new fracked gas, coal, oil, or other fossil fuel infrastructure development;

- Repealing the Pipeline Tax to prevent utility companies from turning to ratepayers to finance fossil fuel expansions;
- Expanding “mini-grids” and “smart grids” to decentralize our power distribution structure;
- Educating the public on sustainable farming practices like crop rotation and soil management to better preserve lands that act as natural carbon sinks;
- Mandating community and stakeholder involvement in the planning and implementing of resiliency measures;
- Monitoring state agencies for compliance with Lead by Example programs and holding them accountable should they fall short.

There is no shortage of steps to take to build the zero-carbon future Gov. Lamont outlined in Executive Order No. 3. If the will is there, Connecticut could cement our standing as a national leader in the clean energy future. We could make investments that will not only help us turn back the clock on climate change, but also create green collar jobs and lower our massively high electric rates.

Thank you again for the opportunity to submit these comments. We at CTLCV look forward to working with you and the entire Lamont Administration in the days to come.

Sincerely,



Amanda Schoen

Deputy Director
CTLCV



Connecticut Roundtable on Climate and Jobs

14 Tremont Street
Hartford, CT 06105

November 8, 2019

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm St
Hartford, CT 06106

Dear Commissioner Dykes:

On behalf of the Connecticut Roundtable on Climate and Jobs (CRCJ), I write to express support for the expanded scope and membership of the Governor's Council on Climate Change (GC3). Having served on the GC3 since its establishment, I am pleased to see that the work will be carried forward.

I believe that the proposed framework with subcommittees and working groups is a sensible approach to accomplishing this daunting task and bringing a broader range of expertise and experience into the work.

I have one substantive comment related to the framing questions proposed to guide the new area of Adaptation and Resilience. I think a significant gap in the proposed questions relates to the enormous scale of the construction activities that will likely be part of any comprehensive resilience effort. I believe it will be critically important to ensure that leaders from the State Building and Construction Trades Council are invited to participate in the discussions as a key stakeholder group. And I would encourage that the framing question #6 be expanded to address the question of ensuring high-quality, in-state jobs as the best way to maximize *economic* impacts and benefits to the state and local communities.

The recent offshore wind legislation requires that all offshore wind projects pay prevailing wage and be governed by project labor agreements. The GC3 should consider what size and types of adaptation and resiliency projects should be subject to similar requirements to ensure that Connecticut reaps the greatest benefit from these investments. As we prepare to invest billions of dollars in local communities, we have an opportunity make sure that much of the money stays there.

I appreciate this opportunity to comment on the Executive Order #3, and CRCJ is eager to support the GC3's work in the months and years ahead.

Sincerely,

John Humphries
Executive Director/Lead Organizer

*Building alliances among diverse constituencies to combat climate change, create jobs
and promote racial, economic and environmental justice*

CTClimateandJobs.org

November 8, 2019

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

Dear Commissioner Dykes,

Thank you for the opportunity to provide comments on Governor Lamont's Executive Order No.3 to strengthen Connecticut's commitment to the transition to a decarbonized economy and enhance resiliency of the state's economic, cultural, and natural resources to the impacts of climate change. We at the Connecticut Green Building Council (CTGBC), American Institute of Architects Connecticut (AIA CT), Connecticut Passive House (CTPH), and Living Building Challenge: Connecticut Collaborative (LBC CT) are excited to see the state commit to ambitious climate goals, as local leadership is necessary to face the looming threat of the climate crisis.

Building Sector Greenhouse Gas (GHG) Emissions Related to Energy Usage

The report, [Building a Low Carbon Future for Connecticut: Achieving a 45% Reduction by 2030](#), identifies the building sector as contributing 31% of 2014 GHG emissions in Connecticut. In fact, that percentage is even higher if you also take into account that buildings use about 72% of the electrical power generation according to the [US Energy Information Administration's Annual Energy Outlook 2014](#). Therefore, the building sector accounts for as much as 47% of the GHG emissions in Connecticut. Buildings and the built environment are a major factor in meeting our state's ambitious climate goals.

Building Sector GHG Emissions Related to Materials and Construction

The embodied carbon emissions of building products and construction is increasingly identified as a significant source of greenhouse gas emissions. Globally, embodied carbon is responsible for 11% of GHG emissions. Concrete, Iron, and Steel alone produce approximately 9% of annual global GHG emissions. Embodied carbon accounts for 28% of global building sector GHG emissions. According to [Architecture 2030](#) "We cannot meet climate goals without also eliminating embodied carbon emissions by 2050."

Structure of the Governor's Council on Climate Change

Given the importance of the building sector to meeting our state's climate goals and to do our part to avert the climate crisis, we strongly recommend that professionals in the building sector be included in the working groups, such as Architects, Engineers, Contractors, Sustainability Consultants, Developers, Facility Managers, and Real Estate Professionals. We also strongly recommend that a separate working group be created to address the built environment under both the mitigation and adaptation subcommittees. Our four organizations are invested in driving the transformation to a more healthy, sustainable, equitable, and resilient built environment in Connecticut and are happy to recommend knowledgeable professionals to fill these positions.

Building Sector Strategies to Reduce GHG Emissions

The strategies outlined in the report, Building a Low Carbon Future for Connecticut, are a good start, but these strategies need to be expanded upon to capitalize on the state's ambitious goals. For example, increasing air tightness and insulation in the building envelope also requires the addition of energy recovery ventilation to provide healthy indoor air quality, which is an important consideration especially in lower income communities experiencing higher rates of asthma and given that people spend more than 90% of their time indoors. These high efficiency ventilation systems should be incentivized in addition to building envelope upgrades and renewable thermal technologies. Professionals can help the state identify the holistic measures and define the terms that will assure Connecticut's sustainable, resilient future, and our state's positive contribution to the growing global commitment to restoring health to our small and fragile planet.

Other suggestions for expanding beyond these strategies include, but are not limited to, the following:

- Require that state and municipal buildings and infrastructure meet a high-performance standard, such as LEED Platinum, CORE Green Building, Passive House, Living Building Challenge, or SITES Platinum, and provide incentives for those in the private sector to achieve these ratings. We support robust adoption and enforcement of the International Green Construction Code (IgCC) which we understand is currently under review. We hope to be consulted in the final development of the regulations, implementation, and enforcement.
 - Seattle has a [Living Building and 2030 Challenge Pilot program](#) to give incentives for projects that meet program standards.
 - [Everblue](#) has a list of cities that have ordinances that require LEED.
 - Massachusetts' new [three year energy-efficiency plan](#) includes a sizeable incentive program for projects pursuing Passive House certification.
- Require review of building operation costs in the review of state funding for building and infrastructure projects.
- Require that state and municipal buildings be zero energy ready (designed to achieve zero energy levels of efficiency and able to produce as much energy as consumed) and consider extending zero energy requirements to private sector projects as well.
 - The American Institute of Architects believes it is the Architectural profession's responsibility to eliminate carbon emissions in the building sector by 2050. The path to meeting that goal is set forth in the [2030 Commitment](#) which calls for zero energy new construction by 2030, and retrofitting existing building stock to zero energy by 2050.
 - The City of Pittsburgh passed a [zero energy ordinance](#) on 10/15/2019.
 - [California's Energy Efficiency Strategic Plan](#) has ambitious goals for the development of zero energy buildings.
 - [A recent report](#) by neighboring USGBC Massachusetts demonstrates that zero energy buildings can be constructed for little to no upfront costs with a very short-term return on investment.
 - Architecture 2030 provides policy tools for [achieving zero](#) energy and phasing out GHG emissions from the building sector, including their ZERO Code and policy precedents from other jurisdictions.
- Require that State agencies consider the embodied carbon of industrial products when contracting for state-funded projects and incentivize privately funded projects to reduce embodied carbon.
 - [Buy Clean CA Act](#) will require environmental product declarations for certain materials such as steel and glass in state-funded infrastructure projects beginning January 2020.

- Architecture 2030 has [policy guidelines](#) for reducing embodied carbon in new construction.
- Implement mandatory building carbon emissions reductions in existing buildings.
 - [2030 Challenge](#) has provided a framework for retrofitting existing buildings, big and small, to meet carbon reduction targets.
 - [NY Building Emissions Law](#) Local 97 of 2019 requires that buildings over 25,000 SF meet carbon emissions caps in 2024 and 2030.
- Make the energy consumption and carbon emissions of public buildings publicly accessible.
 - In addition to posting the energy usage and carbon emissions by department, it would be useful for the building sector to see Energy Use Intensity, Carbon Emissions, and Embodied Carbon per building.
 - Minnesota has developed a benchmarking application [B3 Benchmarking](#) for tracking the energy usage of public buildings, and the total Energy Use Intensity of each participating city and town is publicly reported.
 - Some tools available for benchmarking existing building performance data are [Energy Star Portfolio Manager](#) and the [Arc Skoru](#) benchmarking tool.
- Create a Residential Property Assessed Clean Energy (R-PACE) program to assist low-income households with financing energy improvements.
 - See [CTGBC's letter](#) supporting CT 2017 SB 973 which never made it to the floor for a vote.
- Drive the electrification of the building sector by phasing out natural gas hookups in new buildings.
 - The city of Berkeley, CA passed [an ordinance](#) to ban natural, fossil gas hookups in new buildings.

We have a few upcoming programs that may be of interest to the administration to learn more about high performance buildings:

- CTGBC is holding a [tour of the first commercial zero energy building](#) in Connecticut on November 20, 2019 at Blake Group Headquarters in East Windsor, CT.
- AIA CT is planning a net zero schools summit to be held on January 31, 2020 at Hastings Hall at Yale University.
- Please consider joining CTGBC/ CTPH/ LBC CT members at our joint holiday party which will be held on December 10, 2019 at Brewport in Bridgeport, CT.
- Look out for a graphic display on climate action sponsored by AIA CT in March 2020 between the LOB and the Capitol.

We look forward to serving as an integral partner to identify the steps that can help Connecticut be a leader in addressing the climate crisis and driving the transformation towards a more healthy, sustainable, equitable, and resilient built environment.

Sincerely,



Wayne Cobleigh CPSM
Board Chair
CT Green Building Council



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Agnes Recato MS, LFA

From: [Jean Darlington](#)
To: [DEEP ClimateChange](#)
Subject: Public Comment about Gov. Lamont's Executive Order #3
Date: Wednesday, October 30, 2019 5:21:33 PM

Dear Commissioner Dykes,

As a voting, taxpaying citizen of Connecticut who is very concerned about the looming climate crisis, its effect on Connecticut, and our responsibilities to work on combating it, I support the concept of Governor Lamont's Executive Order No. 3. We need de-carbonize Connecticut's electric grid to combat climate change. However, I believe the measure should be stronger, with shorter timelines because if we wait until 2050, it will be too late. Here are my comments.

Please make sure to include representatives from marginalized and disenfranchised communities on the GC3 because the effects of climate change are usually even more severe for communities with the least means. Please reach out to community organizations such as BiciCo at the Center for Latino Progress in Hartford; BiciCo is working in the community to help get people out of cars and onto bikes, and advocating for making bike riding in our city streets safer (<https://bicico.org/>).

We need to transition to 100% clean energy as soon as possible. The Renewable Portfolio Standards goals of 40% clean energy by 2030 should be a higher percent and a faster timeline. We should also plan for the potential decommissioning of the Millstone Nuclear Power Plant in the next ten years. Connecticut needs to put a plan in place now so we will not need to use fossil fuels like fracked gas to meet our energy needs, which would be completely against Executive Order No. 3 and our previous commitments.

I strongly oppose investments in fossil fuels such as the new fracked gas power plant planned in Killingly. This power plant would work against the Governor's zero-carbon proposal because it would increase, not lower, carbon emissions. Connecticut needs to invest instead in energy efficiency and battery storage to ensure reliability even during peak times without turning to fossil fuels.

Connecticut should expand access to energy efficiency programs by helping people enroll automatically in energy efficiency programs. This would reduce the draw on our electric grid while reducing electric bills for the roughly 400,000 households struggling to pay them.

We need to partner with other ISO New England states to increase Connecticut's clean, renewable energy procurements. We should also increase our investments in solar energy, particularly shared solar programs for people who cannot put solar panels on their rooftops. Connecticut should eliminate restrictions on community solar to allow this program to expand, giving more households the chance to benefit from clean energy and lower their costs.

We need to increase our investments in forests and protected open space, especially old forests with many large trees, which act as critical carbon sinks. Connecticut should stop diverting funds from programs like the Community Investment Act to ensure we can protect our forests from development.

We should look for every possible way to reduce carbon emissions to combat climate change. For example:

- Stop mowing grassy highway median strips and filling in wetlands at the edges and intersections of highways; this practice wastes money and contributes to more carbon emissions. These areas should be allowed to grow back to forest because forests sequester carbon so effectively. Furthermore, they help to reduce water runoff, and they provide critical wildlife habitat.
- Electrify and vastly expand our mass transit infrastructure, including school buses, to reduce the number of cars driving on our roads;
- Make our roads and streets safer for bicyclists to encourage people to reduce their reliance on cars;
- Set strict energy efficiency standards for buildings to reduce emissions, lower their draw on the electric grid, and reduce energy costs;
- Inform households about energy efficiency upgrades and best practices;
- Create a Residential Property Assessed Clean Energy program to assist low-income households with financing energy efficient improvements;
- Increase our Renewable Portfolio Standard to 100% clean energy by 2030;
- Ban new fracked gas, coal, oil, or other fossil fuel infrastructure development;
- Repeal the Pipeline Tax to prevent utility companies from turning to ratepayers to finance fossil fuel expansions;
- Decentralize our power distribution structure with mini-grids and smart-grids;
- Educate the public on sustainable farming practices like crop rotation and soil management to better preserve lands that act as natural carbon sinks and to provide for a sustainable, local food supply in the future;
- Mandate community and stakeholder involvement in the planning and implementing of resiliency measures;
- Monitor state and local agencies for compliance and hold them accountable.

Such measures are essential to Connecticut doing our part to help reduce climate change. It will create green collar jobs and lower our massively high electric rates. The longer we wait and the less we do, the worse the effects of climate change will be.

Sincerely yours,
Jean Darlington, New Hartford

November 8, 2019

Katie Scharf Dykes, Commissioner
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Sent via email: DEEP.ClimateChange@ct.gov

Re: Comments on Public Notice for CT Governor Lamont's Executive Order No. 3

Dear Commissioner Dykes:

The Connecticut Light and Power Company and Yankee Gas Services Company d/b/a Eversource Energy (collectively, "Eversource"), submits this comment letter in response to the October 24, 2019 Public Notice from the Governor's Council on Climate Change (the "GC3") requesting comments on its proposed framework for addressing responsibilities established by Governor Ned Lamont in signed Executive Order No. 3 ("EO3").

Eversource agrees with the proposed framing questions and thematic areas of the GC3 and would like to point out that many Eversource projects already focus on climate mitigation and adaptation strategies. At Eversource one of our core values is to serve as a clean energy catalyst both regionally and nationally delivering innovative, forward-looking cleaner energy solutions. We are pursuing offshore wind projects, exploring green gas alternatives, expanding the electric vehicle recharging station network, and installing solar projects to the maximum extent allowed by states in our service territory. Eversource is committed to continuing our leadership in green initiatives, including climate strategies, and aligning them with the EO3 and the work of the GC3.

To better serve the GC3 and our customers, Eversource respectfully requests a seat on the GC3 and its subcommittees, and the ability to participate in ongoing discussions with stakeholders. We are, as a company, in a strong position to respond to issues concerning electric and gas infrastructure resilience that will undoubtedly be brought forth during discussions of the GC3 and its subcommittees. Our technical knowledge and expertise will provide important insight during these critical discussions on the state's framework related to the implementation of carbon mitigation and climate adaptation strategies.

Thank you for your consideration of our comments. Should you have questions and need additional information, please contact me at (781) 441-8859.

Sincerely,



Catherine Finneran
Vice President, Sustainability and Environmental Affairs

From: [andrea Feig](#)
To: [DEEP ClimateChange](#)
Subject: Environment
Date: Wednesday, October 30, 2019 12:14:11 PM

To Whom It May Concern:

- **Investing in clean energy, energy efficiency, and battery storage.** Earlier this year, Connecticut issued a procurement for 2,000 MW of offshore wind energy. That represents a third of our energy needs, and it's a significant investment in clean energy. But we can do more. The cleanest energy is the energy we don't use, and energy efficiency both draws down the demand on our electric grid while helping households afford their energy bills. Meanwhile, battery storage will allow us to power our homes and businesses with clean energy even when the wind isn't blowing or the sun isn't shining.
- **Banning new fracked gas, coal, oil, or other fossil fuel infrastructure development.** Before the Governor issued his executive order, the Connecticut Siting Council approved a fracked gas power plant at Killingly. This plant would be operational well past 2040, and spewing carbon and greenhouse gases into our air. Additionally, the Pipeline Tax remains on the books despite broad support for repealing it. This tax would allow Eversource or other utilities to charge ratepayers directly to build a new fracked gas pipeline. These expenses aren't in keeping with the Governor's executive order and shouldn't proceed.
- **Funding open space and forest preservation programs.** Forests are critical carbon sinks, but programs like the Community Investment Act are often the first to be raided during budget shortfalls. We need to stop diverting funds from conservation programs and start investing in open space.
- **Supporting resiliency measures to protect against flooding, storm surges, and other weather events.** We're already feeling the effects of climate change, and it's more cost-effective to invest in resiliency instead of repairs. We need to protect our vulnerable coastline communities as well as our cities, which requires both investment as well as community and stakeholder involvement.

Andrea Feig

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From: [Carmela Garofalo](#)
To: [DEEP ClimateChange](#)
Subject: Governor's Executive Order 3
Date: Sunday, November 10, 2019 8:24:19 AM

I write in response to request for comments on the Governor's Executive Order 3 on climate change.

I commend the governor for this order and would add that

- CT needs to stop & ban construction of fossil fuel infrastructure (including methane gas plants like Killingly, and Bridgeport)
- This order does not address buildings, agriculture or expanding mass transit
- 2040 is too late for phasing out climate damaging emission.

This is an extremely important issue. The governor and DEEP must take definite action as soon as possible. We cannot afford to wait.

Thank you for your work.

Sincerely yours,
Carmela Garofalo
10 Westbrook Rd.
Bloomfield CT 06002

Public Input

Executive Order No. 3

I apologize for the unorganized and limited response, but little time was left in the comment period when I became aware of the opportunity to provide comments.

Science and Technology - Provide scientific and technical support to GC3 and subcommittees and assist with translating climate modeling and data into actionable, downscaled information that can be used to incorporate climate change into planning processes.

I fully support efforts to understand ALL scientific inquiries into the areas of science related to and affected by changes in global and regional climate. However, “translating climate modeling” and related data is wasteful and will continue to lead to poor decision and policy making, particularly with respect to the production and distribution of energy. The reason is that climate models are not science (no hypothesis can be tested), require a myriad of assumptions and insufficient data to run them, and include variables that we know little about. For example, NASA states on its Cloud Climatology Scientific Brief (web page) that “today's models must be improved more than tenfold in accuracy, requiring much more and much better data for developing a better understanding of clouds.” Therefore, as a tool to base policy and billion dollar decisions on, they are so flawed that they are counterproductive.

It appears that clouds can have warming and cooling affects depending on a variety of factors. We know intuitively that nighttime cloud cover results in warming (slowing cooling) temperatures. Whereas, daytime cloud cover appears to have a cooling effect. There is currently little understanding as to magnitude effect that cloud cover has on surface temperatures. However, all climate models used by the IPCC assume that clouds have a large, net warming feedback loop effect. Yet, according to the International Satellite Cloud Climatology Project, “The net effect of clouds on the climate today is to cool the surface by about 5°C (9°F).” Therefore, all of the models that, to date, have been used to argue significant warming as a result of a doubling of atmospheric CO₂, dramatically overestimate (predict/forecast) future global warming. And, it is precisely that warming potential that are driving poor energy production decisions.

Based on a wrong understanding of the limitations and reliability of GCMs, ill-conceived policies and decisions have already been implemented that are inefficiently directing scarce resources (funding) which could have been used to control non-invasive species, minimize habitat fragmentation, improve treatment of stormwater runoff, protect endangered species, restore degraded habitat, etc.to a non-problem. It is clear that the data and predictions produced by GCMs are useless.

Recent Relevant Published Papers

Wong and Minnett (2018)

Tapiador et al., 2019

Crawford et al., 2019

Liu et al., 2019

Williamson and Sansom, 2019

Chen et al., 2019

Potential warming and increases due to increases in the concentration of atmospheric CO₂ has largely been predicted to cause catastrophic, negative impacts. However, a cursory, objective scientific investigation would allay these fears. In fact, many benefits to the environment and human health can be predicted from a warmer environment with high levels of atmospheric CO₂.

Scientifically, much of the work done has not been made widely known. For example, a vast amount of field experiments have been conducted that grow various plant species in ambient and amplified concentrations of atmospheric CO₂. A vast amount of data can be found at <https://www.CO2science.org>.

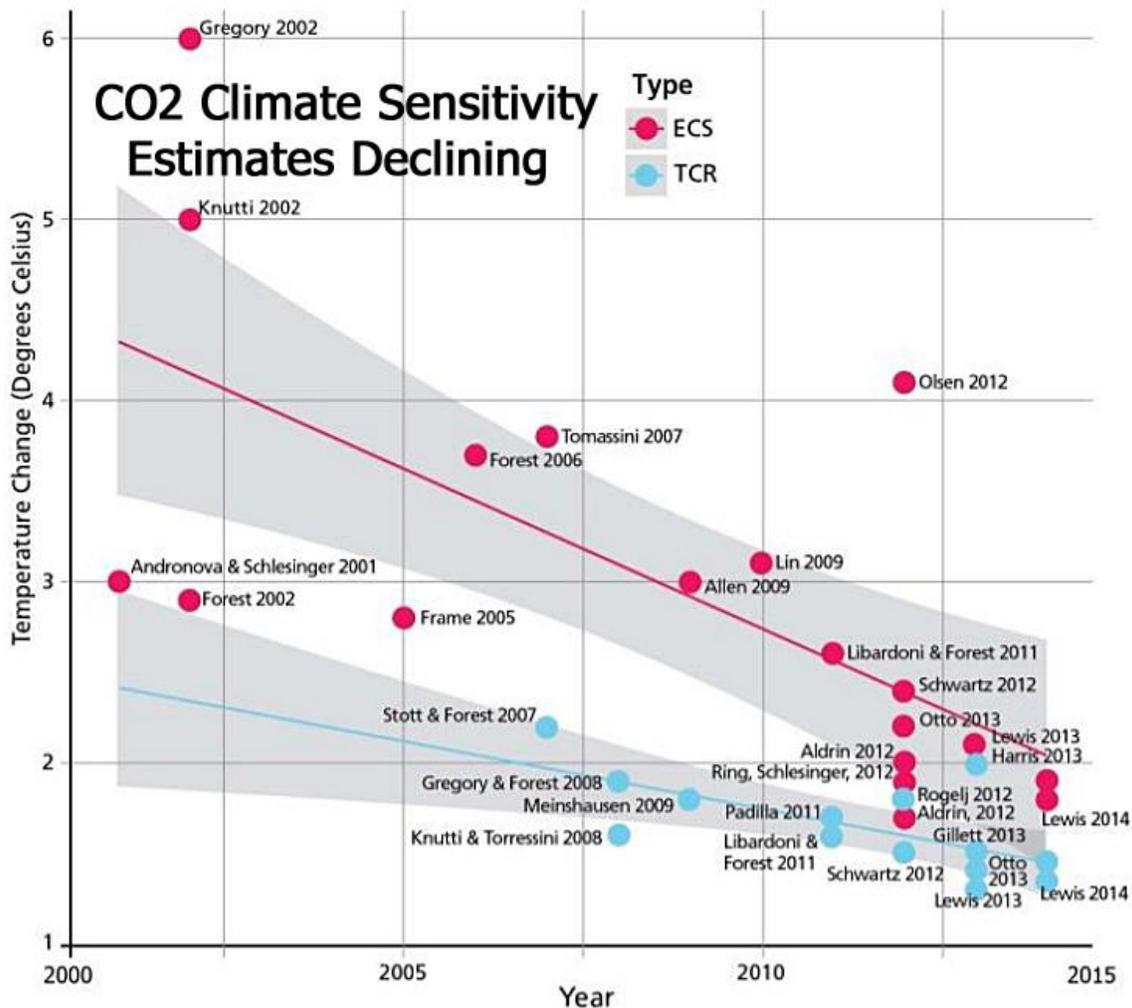
Almost without exception, plants grown in higher CO₂ concentrations (2x & 3x ambient levels):

- 1) Experience more robust growth;
- 2) Are more drought resistant;
- 3) Have more root mass; and
- 4) Produce higher, more nutritious yields.

As a result, many scientists have stated that increasing atmospheric CO₂ has been and will continue to green the planet, not destroy it.

NASA data shows a large, recent greening of the planet, largely due to increases in atmospheric CO₂.

<https://www.nasa.gov/feature/goddard/2016/carbon-dioxide-fertilization-greening-earth>



(figure as shown in Scafetta et al., 2017)

Figure 7. Compilation of published transient climate response (TCR) and equilibrium climate sensitivity (ECS) values to atmospheric CO₂ doubling. (Adapted from Figure 1

By Kenneth Richard on 4. June 2018

Dr. Boris M. Smirnov, a prominent atomic physicist, has authored 20 physics textbooks during the last two decades. His latest scientific paper suggests that the traditional “absorption band” model for calculating the effect of atmospheric CO₂ during the radiative transfer process is flawed. New calculations reveal that the climate’s sensitivity to a doubling of the CO₂ concentration is just 0.4 K, and the human contribution to that value is a negligible 0.02 K. (Scafetta et al 2017)

As can be clearly discerned from the chart, as more scientific investigations into the potential sensitivity to a doubling of CO₂ are published, the smaller the impact on T increasing the concentration of atmospheric CO₂ is calculated to produce. The chart, which does not include the most recent sensitivity estimates, shows that, with time and advancements in understanding, the sensitivity is approaching negligible impacts. Yet, despite the recent science, policy makers continue to move down a dangerous path set forth by scientific understanding from over 20 years ago. Then, some of those misunderstandings are fed into GCMs which, in turn, produce flawed, unreliable, and misleading data which in turn support misleading predictions. Predictions of warming have not occurred consistent with model predictions. Predictions of SLR have not occurred consistent with model predictions by a large factor. There has been no acceleration in the SLR tide gauge data. In fact, the historic trend is largely being continued except in areas where groundwater pumping is causing the land to subside, thus giving the impression that SL is rising faster than the historic trend.

Equity and Environmental Justice - Develop a robust stakeholder engagement process to ensure that the communities most vulnerable to and disproportionately impacted by climate change have the opportunity to meaningfully participate in the development of climate change mitigation and adaptation strategies that meet their needs and achieve equitable solutions.

This is a curious category. In CT, due to its small area, any significant climate change should impact all residents somewhat equally. Ongoing SLR will of course impact those choosing to live in the coastal communities, particularly those close to LIS. Economically, however, many will be severely impacted by the energy policy decisions which, in an attempt to react to scientifically useless climate models, will drive energy prices up significantly. Such impacts have been clearly seen in Germany and Denmark and in other European countries that have invested more significantly in wind turbines and other perceived “renewable” energy sources while abandoning more traditional, but vastly more reliable and less expensive energy.

Progress on Mitigation Strategies - Review and evaluate progress in implementing the recommendations outlined in the 2018 GC3 report, [Building a Low Carbon Future for Connecticut: Achieving a 45% GHG Reduction by 2030](#). Assess how recommended strategies are integrated into existing and new policy planning efforts, evaluate the efficacy of existing and proposed policies at reducing GHG emissions, and prioritize the equitable distribution of costs and benefits of climate change mitigation.

Attempting to reduce CO₂ emissions is foolish, wasteful, and carries very high opportunity costs. The solutions put forth to reduce carbon, such as wind and solar energy cannot reduce CO₂ emissions because they can only supply unreliable, intermittent energy and will always require spinning backup from carbon sources. More importantly, as previously stated, our atmosphere is currently starved of CO₂. Increasing concentrations have been greening the planet and increasing life. Historically, atmospheric CO₂ has been over 10X its current level and there was no runaway warming. In fact, surface temperatures are estimated to have been warmer with less CO₂ and colder with significantly more CO₂. The GCMs cannot explain these situations, so they are simply ignored. Finally, science is pointing more and more to the sun as being the dominant driver of warming and cooling periods, with ocean circulation as moderating and complicating factors that can significantly affect regional decadal weather patterns.

Switching from carbon based fuels to solar and wind turbines to produce electricity has not been demonstrated to reduce overall CO₂ emissions at all. For example, Denmark and Germany have installed a

tremendous amount of wind power, but their CO2 outputs have continued to increase rather than decrease. The effective approaches that actually reduce CO2 emissions include:

- 1) Replacing carbon-based energy sources with nuclear power
- 2) Replacing carbon-based energy sources with hydro-power
- 3) Replacing carbon-based energy sources with more efficient dispatchable carbon-based energy sources.

Any slowing of the rate of increase in CO2 production in Denmark and Germany is most likely due to the decrease in demand caused by the significant increase in electricity prices, which have harmed their economies, citizens, businesses and their environmental resources. If prices doubled in CT, surely consumption would fall significantly. In response, people and businesses would leave the state in pursuit of better, more sustainable options.

So we have real world pilot projects including the use of wind turbines in the US that demonstrate that investing in Wind energy (which require very high levels of subsidies) is very detrimental to both the environment and energy customers. Using wind turbines to generate direct electricity is one of the most environmentally damaging approaches to produce usable, dispatchable electricity. The shortcomings of wind energy include:

- 1) Highly land intensive, adding significantly to habitat loss and fragmentation

“the new study, published in *Environmental Research Letters*, shows yet again that wind energy’s Achilles heel is its paltry power density. “We found that the average power density—meaning the rate of energy generation divided by the encompassing area of the wind plant—was up to 100 times lower than estimates by some leading energy experts,” said lead author Lee Miller, a postdoctoral fellow who coauthored the report with Harvard physics professor David Keith. The problem is that most estimates of wind energy’s potential ignore “wind shadow,” an effect that occurs when turbines are placed too closely together: the upwind turbines rob wind speed from others placed downwind.

The study looks at 2016 energy-production data from 1,150 solar projects and 411 onshore wind projects. The combined capacity of the wind projects totaled 43,000 megawatts, or roughly half of all U.S. wind capacity that year. Miller and Keith concluded that solar panels produce about 10 times more energy per unit of land as wind turbines—a significant finding—but their work demands attention for two other reasons: first, it uses real-world data, not models, to reach its conclusions, and second, it shows that wind energy’s power density is far lower than the Department of Energy, the IPCC, and numerous academics have claimed.

Source - <https://www.city-journal.org/wind-power-is-not-the-answer>

- 2) Requires smaller, less efficient free-spinning natural gas, diesel, or other reliable (CO2 emitting energy sources) to balance wind’s unreliable production.
- 3) Cannot provide base load or peak load
- 4) Harmful to birds, bats, and potentially humans
- 5) Have short production lives (15-20 years)
- 6) Use large quantities of rare earth elements such as Neodymium (Nd), Dysprosium (Dy), and Praseodymium (Pr):
- 7) Blades cannot be recycled, so they are currently being discarded in 3rd world countries (boneyards).
- 8) Low-frequency noise may disrupts animal grazing habits
- 9) Abandoned wind farms leave behind a legacy of visual impacts, large concrete foundations, and public costs
- 10) Due to the need for spinning back-up, wind turbines do not reduce CO2 production (see Germany and Denmark)

- 11) Unnecessarily drive up energy prices - Germany and Denmark have the highest reliance on wind and have the 2nd and 3rd highest cost /kWh, in the world; about 3x cost of CT residents.
- 12) Abysmal performance record, often producing far less electricity than developers promise
- 13) Ice throw potential in CT climate
- 14) Turbines often located far from grid, requiring extensive power lines.
- 15) Require construction of new, wider access roads.
- 16) Often require huge concrete foundations for each turbine.
- 17) Unknown environmental impacts of offshore farms
- 18) Require long-term (never ending) massive subsidies

Recent headlines/excerpts:

German City Of Aachen Cuts Down Over 600 Acres Of Natural Forests To Install Seven 200-Meter Tall Wind Turbines!

Jan 03, 2019

Wind turbines are neither clean nor green and they provide zero global energy

Matt Ridley

Germany's Wind Energy Mess: As Subsidies Expire, Thousands Of Turbines To Shut Down...Environmental Nightmare!

By P Gosselin on 24. April 2018

Ralf Schuster of *Vernunftkraft* did an analysis looking at the distribution of the power fed in according to class (Verteilung der Einspeisung nach Klassen) of the total wind energy that was generated: 10,693 gigawatt-hours in June.

Summe der erzeugten Energie		10.693GWh
Verteilung der Einspeisung nach Klassen		
0% bis 10% NL	320,25 h	43,0%
11% bis 20% NL	213,50 h	28,7%
21% bis 30% NL	160,75 h	21,6%
31% bis 40% NL	48,00 h	6,5%
größer 40%	1,50 h	0,2%
Summe	744,00 h	100,0%

Source: *Rolf Schuster, Vernunftkraft.*

The table above shows the wind ran a total of 744 hours. Some 320.25 hours, or 43% of the total time, saw wind turbines running at a measly 0 – 10% of their rated capacity. The turbines ran at 40% or more of their rated capacity for only a totally lousy 1.5 hours (0.2% of the time)!

Rise in renewable energy will require more use of fossil fuels

One of the hidden costs of solar and wind power — and a problem the state is not yet prepared to meet — is that wind and solar energy must be backed up by other sources, typically gas-fired generators. As more solar and wind energy generators come online, fulfilling a legal mandate to produce one-third of California's electricity by 2020, the demand will rise for more backup power from fossil fuel plants

I suggest that real world application of wind energy has been a massive failure which has caused far more damage than the traditional choices and has stolen large quantities of money from energy customers. Additionally, and as stated earlier, the opportunity cost of choosing wind energy over other less expensive and less environmentally-damaging carbon-based sources has been to diverted limited funds and attention away from real and challenging environmental issues.

What should CT be pursuing to provide dependable, safe, reasonably priced, and environmentally respectful energy to its residents?

- 1) Consider (SMRs) mini- and micro- thorium-based or traditional nuclear power. We are fortunate that the US has some of the highest known reserves of Thorium. Thorium is safer than uranium and has other advantages. These smaller reactors could be used to ensure local energy supplies during larger power outages. For example, critical facilities such as hospitals, shelters, schools, nursing homes, etc. could be directly connected to a closer reactor to significantly minimize potential power outages.
- 2) Focus on improving energy efficiency and delivery of existing, reliable sources.
- 3) Abandon, high cost choices like wind, solar, and biomass that simply make people feel as if they are being good stewards when those same choices have far greater impacts on the environment. Additionally, these options have already been shown to be ineffective at reducing CO2 emissions.
- 4) Keep close watch on promising, emerging technologies and be ready to partner with the private sector to initiate new technology pilot projects.
- 5) STOP artificially making electricity bills higher in order to make high-cost renewable alternatives seem reasonable.
- 6) Look for opportunities to use the waste heat generated from traditional energy production to be used by adjacent manufacturing or other uses that can use the heat.
- 7) Focus on grid stabilization and protection from attack.
- 8) Rely on the ingenuity of Americans to create cleaner, safer, more reliable, and less environmentally-damaging alternative forms of energy production.
- 9) STOP subsidizing expensive options that destabilize the grid, drive up energy prices and create little new usable energy.

Developing a Framework for Adaptation & Resilience

In approaching the critically important task of leading the development, implementation, and institutionalization of climate change adaptation strategies in Connecticut as described above, the GC3 will consider the following key framing questions:

1. ***Which sectors and systems will be impacted by climate change and its related hazards and in what way? A more relevant question how will the environment be impacted by the policies currently being enacted and further advanced to reduce anthropogenic CO2.*** The stated approach will continue to drive up energy prices. A natural response will be for citizens to reduce their expenses. They will burn more

wood in far less efficient wood and pellet stoves that emit higher levels of pollutants than large, controlled production facilities. Habitat fragmentation will continue as solar and wind projects are implemented in CT because of their land intensive nature. People and businesses will leave CT for a better future as energy prices and debt are driven higher.

2. *What additional science and data are needed to better understand and address the expected impacts of climate change on vulnerable communities and ecosystems in Connecticut?* Quite a bit of science has already been published that has just simply been ignored and the author's reputations impugned. The science has invalidated the theory of (AGW) Anthropogenic Global Warming, which has been turned into Climate Change. The state would be well served if it could find a group of objective people that are tasked with the responsibility of compiling all the credible science supporting and opposing the AGW theory. For example, actual (not theoretical) pros and cons regarding existing (traditional), new, and renewable energy sources could be established as backed up by science and practical performance data including subsidies. Armed with a complete record of the science and performance history of the various energy sources, policymakers can actually have a better way forward setting sound energy policies that benefit CT residents, not just the manufacturers or suppliers.

3. *How will we ensure diverse stakeholders are engaged throughout the planning, development, and implementation of adaptation and resilience strategies?* As far as I can tell, all stakeholders that share an opposing view are frozen out of the process. See #2 above to broaden the understanding of the science. Energy production should be fact-based, not political. NGOs now seem to have a larger voice regarding these issues than CT residents. Before stakeholders can weigh in, the facts and most up-to-date science must be made available. Most residents only know what has been reported, which has largely been based on useless GCM predictions.

4. *How can we prioritize climate change mitigation and adaptation strategies that protect vulnerable communities disproportionately affected by the impacts of climate change?* STOP basing any decisions on computer models. They are flawed to the point of irrelevancy to decision making, often leading to the worst decisions possible. Again, stop making decisions that destabilize the energy grid. Start hardening the grid and reducing vulnerabilities.

5. *What strategies can we employ to protect and harness our natural resources to mitigate the effects of climate change while fostering natural resource adaptation to a changing climate?* As previously stated, the effects of climate change are exaggerated for many reasons, mostly political. But the basis for the exaggeration is projections based on GCMs, which cannot even come close to modeling the impacts of clouds accurately, thus rendering them useless. Resources lost to everything climate change could be recommitted to addressing real problems like non-point source pollution, habitat fragmentation, invasive species, remediating contamination, and restoring degraded habitat.

6. *How can federal, state, regional, municipal, and local adaptation efforts best be aligned to maximize impact and benefits?* Government staff and decision makers need to wipe the slate clean of everything they think they know and of all their pre-conceived ideas and solutions. Then refer to comments to #2 so an objective analysis of all the potential options can be conducted, which can then form the foundation upon which solid policy decision can be made and enacted.

7. *What funding sources and mechanisms can we leverage to advance investment in adaptation and resilience?* There is NO need to invest in adaptation because any changes will be both slow and mild. Investment will be wasted because the predictions are based on insufficient data and useless GCMs. For example, many astrophysicists are predicting that the earth is, or is very soon to be, entering 3-5 decades of cooling based on the gravitational influence the planets in our solar system exert on the sun in addition to predicted sunspot activity. If the ST declines vs. increases as IPCC models predict, won't the efforts to mitigate be completely wasted. There is already data showing that the cooling has begun. For example, record high temperatures are decreasing rather than increasing as models predicted.

From: Griswold, Evan
Sent: Wednesday, October 30, 2019 12:05 PM
To: DEEP ClimateChange
Subject: Solar arrays on buildings, not agricultural areas or clearcut forests

I am submitting my comment to DEEP ClimateChange. One way Connecticut could improve solar access is to modify State Building Codes to require all new large buildings be capable of hosting solar arrays. This would eliminate the need to take up space on agricultural fields and clearcut forests. These areas are vital for carbon sequestration, especially in older, mature forests in the next 50-100 years. Placing solar on building roofs also brings electricity directly to the users rather taking up space for transmission lines which lose much of the electricity in transit. Rather than clearing acres of forest land, let's preserve forests and manage them for carbon sequestration. Connecticut must have hundreds of acres of roofs and parking lots available for solar arrays nearer to where the electricity is needed. Connecticut still has a long way to go in reaching its goal of 21% open space protection. this should be a priority in the effort to minimize climate change over the next few hundred years. We need to figure out a way to pay land owners who agree not to convert forests needed to sequester carbon. Thank you

Evan Griswold, Master of Forest Science, Yale School of Forestry and Environmental Studies.

Evan S. Griswold
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Licensed in Connecticut

***Wire Fraud is Real*. Before wiring any money, call the intended recipient at a number you know is valid to confirm the instructions.** Additionally, please note that the sender does not have authority to bind a party to a real estate contract via written or verbal communication.

From: [Emily V.](#)
To: [DEEP ClimateChange](#)
Subject: comment on Gov. Lamont's zero-carbon plan
Date: Thursday, October 31, 2019 12:03:01 PM

Commissioner Katie Dykes and DEEP,

I applaud Gov. Lamont and his proposals to transition Connecticut to a zero-carbon electric grid by 2040. Anything that can be done to ensure it progresses is a huge step in the right direction. The proposed power plant at Killingly, however, is not in keeping with this plan. Any new fracking/oil/coal/gas plants should not be approved. Also, as many open space and conservation programs as possible should be maintained and the budget for those kept strictly for their intended use, and not diverted to other things. Clean energy plans should be tantamount, including solar and wind. It's exciting that Connecticut has such high goals and is working towards improving the environment in our state.

Thank you,
Jamila HadjSalem

November 7, 2019

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm St
Hartford, CT 06106

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3. The Order targets strengthening Connecticut's commitment to a decarbonized electric grid and support of our state's efforts to reduce greenhouse gas (GHG) emissions. We are in a climate emergency that requires an intense, consolidated effort across the state, country and globe. Strong goals such as Order No. 3 are needed to lead and organize this effort in Connecticut.

- 1. Please comment on the scope of the framing questions for adaptation and resilience (see prior section). Should any of these questions be omitted or reframed? Are there any additional questions that should be asked?**

Please see my comments below with regard to the above question for each of the 'framing questions' referenced. In summary, the following comments relate to our willingness to be lead by deeper values and a vision of the ideal. The comments seek to point out unconscious framing that promulgates the status quo rather than an orientation to two important perspectives; the severity and urgency of climate disruption, and, a vision of the ideal that addresses root, systemic causes and issues related to climate disruption.

1. Which sectors and systems will be impacted by climate change and its related hazards and in what way? *This seems like an essential question. The question might modified to include an unbiased look at those systems that are impacted, now, as well as choosing words that are more appropriate to the severity and urgency of climate **disruption**; "Which sectors and systems are now, and will be, impacted by climate disruption and its related hazards, and in what way?"*
2. What additional science and data are needed to better understand and address the expected impacts of climate change on vulnerable communities and ecosystems in Connecticut? *This question implies that more science and data is needed. This perspective points toward analysis-paralysis rather than effective action. Moreover, the wording is curious in that it asks for more data with regard to vulnerable communities and ecosystems. Does this imply that no further data is needed with regard to 'expected' impacts on less vulnerable communities/ecosystems? I would also point out that including the phase 'expected impacts' is limiting and unconstructive given that climate change is proceeding at a continually unexpected pace and severity. The question might be better stated as "What can be done to remove barriers to effective action to adapt and make resilient to climate disruption all communities and eco-systems of Connecticut?"*
3. How will we ensure diverse stakeholders are engaged throughout the planning, development, and implementation of adaptation and resilience strategies? *An appropriate response to this framing questions is 'the answer to How is Yes'. This framing question is better stated as "What specific ideas can be offered and ultimately, steps taken, to meet the mandate and essential need to have diverse*

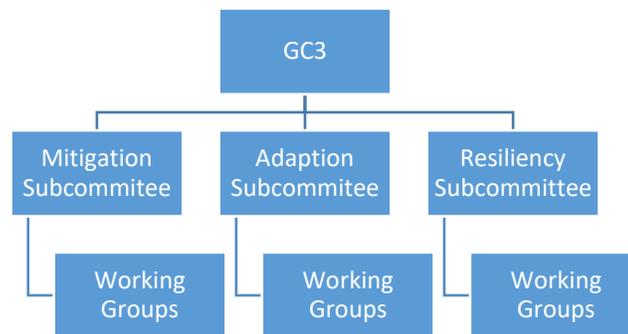
stakeholders engaged in the planning, development, and implementation of adaption/resilience strategies?”

4. How can we prioritize climate change mitigation and adaptation strategies that protect vulnerable communities disproportionately affected by the impacts of climate change? *Please refer to the comments in #3. I think the danger in wording this question in this manner is that it requests answers to a ‘How’ question. It only, if at all, indirectly states the essential need to prioritize the protection of vulnerable communities, and, in asking for responses to the ‘How’ question, reduces the priority of this need to one that is connected to the ability of the responder to devise a means of accomplishing the end. That work, devising means to accomplish the goal of protecting vulnerable communities is the work to be done. The question is, thus, better stated as “Understanding that all climate disruption mitigation and adaption strategies are important and needed, what specific ideas can be offered and ultimately, steps taken to prioritize those strategies that protect the most vulnerable?”*
5. What strategies can we employ to protect and harness our natural resources to mitigate the effects of climate change while fostering natural resource adaptation to a changing climate? *A couple of things with this question. First, it is difficult to understand. What are some examples of harnessing natural resources to mitigate climate disruption? Moreover, the question seems to be too inclusive and might be more effective as three questions: “What strategies to protect, what strategies to harness and what strategies to help natural resources adapt?”*
6. How can federal, state, regional, municipal, and local adaptation efforts best be aligned to maximize impact and benefits? *Again pointing out the shortfall of ‘How’ questions, this is the essential work and the question needs to convey that. The give and take of competing perspectives and the need for creativity, screening and prioritization of idea means it is more productive to frame the effort as optimization rather than maximization. Thus, the question might be stated, “Understanding the essential need to align the efforts at all scales, what specific ideas can be offered and ultimately, steps taken to optimize humanity’s response to climate disruption?”*
7. What funding sources and mechanisms can we leverage to advance investment in adaptation and resilience? *Unfortunately, this question promulgates the idea that climate disruption is a challenge for which we can safely put off responding to until and unless the money to do so is found. This, of course, is a fallacy that needs to be dispelled. Climate disruption is an existential threat and if money can be found to fund wars and bail out banks in order to maintain the destructive fairy tale of infinite economic growth, then money is not an issue with regard to responding to climate disruption. So the practical question to ask is, “What specific ideas can be offered and ultimately, steps taken, to make local, national and global responses to climate disruption the center piece of the Commons; such that the funds to address climate disruption are the highest priority, transcending all other financial and economic demands, and positioned to provide the most ancillary benefits such as quality of life, jobs and access to clean water, clean air and secure abodes for all?”*
2. **Please provide comment on the working group thematic areas, as they contribute to the tasks set forth in E.O. 3. Recognizing the resource limitations on managing multiple working groups, should the scope of any of the proposed working groups be adjusted, or supplemented?**

First, why the question is framed inside of the statement ‘recognizing the resource limitations on managing multiple working groups’? Why is such a constraint imagined (and articulated as an aspect of the question’s framing) rather than offering a framing that includes the needed effort to ensure working groups are optimally organized and sufficiently ‘managed’? Again, this implies that we can only respond to climate disruption if there is enough money, which disregards the enormous bias in spending to uphold destructive systems.

Given the proposed organization of working groups, these other questions emerge:

- a. Why not form three groups, Adaption, Mitigation and Resilience under the umbrella of GC3?*
- b. Designate intermediaries from each group that will be responsible for coordinating the efforts of the three subcommittees.*
- c. Working groups should include the internal work of researching, developing, screening and prioritizing creative responses to their respective areas of concern, as well as members assigned the task of (optimally) coordinating efforts with the other working groups including all state initiatives. This is the essential work of merging the efforts of well-delegated areas of responsibility into a cogent state-wide effort that also complements national and global efforts.*



Governor’s Council on Climate Change

Executive Order No. 3 provides a much needed expansion and strengthening of the Governor’s Council on Climate Change (GC3). The original GC3, while instrumental in setting Connecticut carbon reduction goals, failed to recognize the severity and urgency of climate disruption and the role of fossil fuels and destructive economic fairy tales. Hopefully a more diverse group of voices on GC3 will be willing to address root drivers of climate disruption and environmental destruction. The real work requires the ability and willingness to see and address the systemic drivers of these escalating threats.

Specifically, GC3 representation should include lawmakers, community activists, climate scientists, systems-thinkers, economists, labor representatives, spiritual leaders and a people of a variety of gender, age, and ethnic backgrounds, as well as, especially, from environmental justice communities.

Decarbonizing Our Electric Grid

In order to decarbonize our economy, we need deep energy efficiency at all scales, strategic electrification of heating and transportation, and the greening of the electric grid. A zero-carbon future is not possible in the absence of any one of the above constituents. Given this understanding, the greatest barrier to a carbon-free economy is the corporate hold on electricity generation, transmission and distribution. This

hold is supported by the huge stranded investment in the corporate structure. In order to decarbonize the grid and our economy, these stranded assets must be abandoned and the grid converted to a localized, decentralized, 100% renewable Smart Grid.

Understanding that nuclear power is not carbon-free, and extremely dangerous, we need to abandon this form of electric generation. Connecticut needs a plan to replace Millstone with 100% renewable energy over the next decade. Without a plan, we may turn to building more fossil fuel facilities, which should not be in our future and is not in keeping with Executive Order 3, GHG reduction goals, or Governor Lamont's pledge. Specifically this includes rejecting the recently approved fracked shale gas electric generating plant in Killingly. This plant is not needed and flies in the face of a 100% zero carbon pledge.

We can have reliable energy through investment in energy efficiency, renewable energy and battery storage. Energy efficiency programs should not penalize oil and propane customers, and, Connecticut should look to expand programs like Home Energy Solutions Income Eligible (HES-IE), automatically enrolling households eligible for SNAP, WIC, and/or HUSKY. Automatic enrollment would streamline the process, reduce bills (and confusion) for those who need it most, and cut our energy usage.

Thank you again for the opportunity to submit these comments.

Sincerely,

A handwritten signature in blue ink that reads "Michael G. Harris, PE". The signature is written in a cursive style with a large, looped initial "M".

Michael G. Harris, PE
8 Elm Street
Deep River, CT 06417

From: [Diana Heymann](#)
To: [DEEP ClimateChange](#)
Subject: Comments on Executive Order#3
Date: Wednesday, October 30, 2019 4:29:57 PM

Dear DEEP:

I would like assurance in the following areas as the above Executive Order goes into effect:

1. We need to invest in clean energy, energy efficiency, and battery storage.
2. Please ban new fracking gas, coal, oil or other fossil fuel infrastructure.
3. Please fund open space and forest preservation programs.
4. Please support resiliency measures to protect against flooding and other weather events.
5. Make sure that marginalized and underrepresented communities that face the WORST CONSEQUENCES of Climate Change are included in all of your conversations.

--

Gratefully

Diana Heymann, CT citizen, and rate-payer

From: [Aart Hoogenboom](#)
To: [DEEP ClimateChange](#)
Subject: Climate Change
Date: Wednesday, October 30, 2019 12:34:41 PM

ANYTHING AND EVERYTHING we can do to meet this goal is VITAL

From: [jeff_hush](#)
To: [Leticia Colon](#)
Cc: [DEEP ClimateChange](#)
Subject: Re: Comments on GC3
Date: Monday, November 11, 2019 3:54:29 PM

Dear DEEP,

I was at the November 1 PURA meeting giving testimony about energy affordability and lowering the energy burden on low-income families. I would like to second the very important points made here by Leticia Colon de Mejias. As a low-income person, it is very important that our voices be heard in this debate. This requires that we have a permanent seat at the table. I would like to nominate Ms. Colon de Mejias to be our representative. I have been at several EEB meetings and Clean Energy Task Force meetings over the past 2 years, and Ms. Colon is always the most informed and passionate advocate for our position.

If we are ever going to turn around the troubling income and wealth inequities that plague our nation, we need to do something. Not just sit and wait for a miracle. Please act and open up this process to our representatives.

All the best,
Jeff Hush

Executive Director, Middletown Green Community Center

Co-Founder, CHEER (Comfortable, Healthy, Energy Efficient & Renewable)
"improving low-income housing and health in Middletown"

:

To whom it may concern,

Please find these brief comments regarding equity, diversity, and affordability. We have a deep interest in mitigation planning.

In order to develop a robust stakeholder process we suggest you appoint additional representatives from the diverse public sector of our state. There must be an effort to connect these criticality important planning processes to the residents of our state.

There must be increased focus on serving low income communities with resources that will lower their energy burdens. This could be increased training for potential efficiency or clean energy jobs, and support for expansion of services which lower energy waste/costs/ carbon.

Often the state programs result in support for communities which already have resources. Therefore it is important to include a low income representative on your committee.

Mitigation strategies are complex and there is value in selecting an active EnergizeCT building scientist on the Council. This would help end the silos and increase collaboration between existing resources.

Additionally, it is important that we not get held up on progress when there are immediate actions that could begin to mitigate our carbon emissions. We must take steps to implement the solutions we have while we develop additional opportunities for carbon mitigation.

As a member of the National Building Performance Alliance, I have the benefit of access to current federal policy platforms and data on climate action. These tools would be useful in planning our path to carbon free energy in our state.

I note that the Ex 3 order does not clearly identify the additional groups or appointments. This should be clarified.

We also suggest the addition of a youth representative. This will be their burden to carry and it would be an amazing opportunity for a youth to participate in the planning and communicate the plans to other students and interested youth.

Respectfully,

Leticia Colon de Mejias

www.encyforall.org

From: [Elizabeth Kiernan](#)
To: [DEEP ClimateChange](#)
Subject: Zero-Carbon Executive Order
Date: Wednesday, October 30, 2019 8:14:11 PM

We recognize this as a tremendous opportunity to establish Connecticut as a national leader in the fight against climate change, but only if we take bold action such as:

- **Investing in clean energy, energy efficiency, and battery storage.** Earlier this year, Connecticut issued a procurement for 2,000 MW of offshore wind energy. That represents a third of our energy needs, and it's a significant investment in clean energy. But we can do more. The cleanest energy is the energy we don't use, and energy efficiency both draws down the demand on our electric grid while helping households afford their energy bills. Meanwhile, battery storage will allow us to power our homes and businesses with clean energy even when the wind isn't blowing or the sun isn't shining.
- **Banning new fracked gas, coal, oil, or other fossil fuel infrastructure development.** Before the Governor issued his executive order, the Connecticut Siting Council approved a fracked gas power plant at Killingly. This plant would be operational well past 2040, and spewing carbon and greenhouse gases into our air. Additionally, the Pipeline Tax remains on the books despite broad support for repealing it. This tax would allow Eversource or other utilities to charge ratepayers directly to build a new fracked gas pipeline. These expenses aren't in keeping with the Governor's executive order and shouldn't proceed.
- **Funding open space and forest preservation programs.** Forests are critical carbon sinks, but programs like the Community Investment Act are often the first to be raided during budget shortfalls. We need to stop diverting funds from conservation programs and start investing in open space.
- **Supporting resiliency measures to protect against flooding, storm surges, and other weather events.** We're already feeling the effects of climate change, and it's more cost-effective to invest in resiliency instead of repairs. We need to protect our vulnerable coastline communities as well as our cities, which requires both investment as well as community and stakeholder involvement.

CT is a small state that can make a big difference on how America tackles climate change. We are one of only a handful of US states to have an official ban/tax on plastic bags. This was a huge feat and I believe we can continue making bold laws that will have a positive impact on the future of our health and planet.

Best,

Elizabeth Kiernan
Ridgefield, CT
elizabethkiernan@gmail.com

October 30, 2019

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm St
Hartford, CT 06106

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3 to strengthen Connecticut's commitment to a decarbonized electric grid and support our state's efforts to combat climate change. I am hopeful that the Lamont administration is setting much-needed strong goals to address the climate crisis.

Governor's Council on Climate Change

As part of Executive Order No. 3, Governor Lamont indicated he would expand and strengthen the Governor's Council on Climate Change (GC3). The original GC3 was instrumental in setting Connecticut's carbon reduction goals. I hope within this executive order to see a more diverse group of voices on GC3 going forward. Specifically, I would like to see GC3 representation include lawmakers, community activists, climate scientists, economists, labor representatives, and business leaders. Additionally, GC3 should look like the state of Connecticut – diverse from a variety of gender, age, and ethnic backgrounds, as well as from environmental justice communities. Residents of environmental justice communities in particular are often left out of decision-making, and a reconstituted GC3 is one opportunity to rectify this.

Decarbonizing Our Electric Grid

I am thrilled that Governor Lamont seeks to fully decarbonize Connecticut's electric grid by 2040. I want to see this pledge become a reality. Expanding Connecticut's commitment to build renewable energy beyond the 2000 MW offshore wind facility in the works is essential to meet standards. While Millstone nuclear power plant does not add to our carbon emissions, because of the dangers of nuclear power, Connecticut needs a plan to replace Millstone with 100% renewable energy over the next decade. Without a plan, we may turn to building more fossil fuel facilities, which should not be in our future and is not in keeping with Executive Order 3 or Governor Lamont's pledge.

There should be NO new investments in fossil fuels in our state, especially the new gas power plant planned in Killingly. This plant is not needed in our state and flies in the face of a 100% zero carbon pledge. We can have reliable energy through investment in energy efficiency first and foremost, and pairing that efficiency with renewable energy and battery storage. This will increase reliability while decreasing our footprint. Energy efficiency programs should not penalize oil and propane customers, as is currently the utility practice. Connecticut should look to expand programs like HES-IE and automatically enrolling households eligible for SNAP, WIC, and/or HUSKY in energy efficiency programs. Automatic enrollment would streamline this process, reduce bills for those who need it most, and cut our energy usage.

As we expand renewable energy capacity in Connecticut, we should look outside our state boundaries to potentially jointly procure wind or other energies with Rhode Island and Massachusetts to reduce costs. Internally, we MUST expand shared solar and transition homes to electric-based heating and cooling. Shared solar is especially important for renters and others who cannot install rooftop solar panels. The current restrictive rules on shared solar makes it next to impossible to launch viable projects, and we are rapidly falling behind compared to our neighbors across state lines. Electrification of heating and cooling through heat pump technologies across owner and renter units will further decrease dependency on fossil fuels and reduce the strain of high heating bills.

Aside from efficiency and renewables, Connecticut needs to do more to address carbon sequestration and resiliency. Forests and open space act as critical carbon sinks. Connecticut should stop diverting funds from programs like the Community Investment Act to ensure we can protect our forests from development. Climate change ensures that flooding and storm damage is the new normal; it is much more cost-effective to invest in resiliency now rather than major repairs in the wake of a storm.

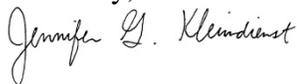
Connecticut must think of the broader picture. To fight climate change and build a zero-carbon future, we must be prepared to take bold action. There are myriad goals we could set and programs we could expand, including:

- Setting strict energy efficiency standards for buildings
- Informing households about energy efficiency upgrades and best practices;
- Investing in low-income energy efficiency work, especially HES-IE, and addressing health and safety barriers with funding
- Creating a Residential Property Assessed Clean Energy (R-PACE) program to assist low-income households with financing energy efficient improvements;
- Increasing our Renewable Portfolio Standard to 100% clean energy by 2040;
- Requiring all new buildings to be “solar-ready;”
- Electrifying a greater percentage of our mass transit—including school buses;
- Banning new gas, coal, oil, and all other fossil fuel infrastructure development;
- Repealing the Pipeline Tax
- Expanding district heating, cooling, and electricity “mini-grids” and “smart grids” to decentralize our power distribution structure;
- Educating the public on sustainable farming practices like crop rotation and soil management and sustainable forestry practices like invasive species removal to better preserve lands that act as natural carbon sinks;
- Mandating community and stakeholder involvement in the planning and implementing of resiliency measures;
- Monitoring state agencies for compliance with Lead by Example programs and holding them accountable should they fall short.

There are many actions necessary to build the zero-carbon future Gov. Lamont outlined in Executive Order No. 3. If the will is there, Connecticut could cement our standing as a national leader in the clean energy future. We could make investments that will not only help us turn back the clock on climate change, but also create green collar jobs and lower our massively high electric rates.

Thank you again for the opportunity to submit these comments.

Sincerely,



Jennifer G. Kleindienst
241 West St.
Middletown, CT 06457

From: [Koepfer](#)
To: [DEEP ClimateChange](#)
Subject: public input to GC3/ Executive Order 3
Date: Friday, November 08, 2019 11:52:07 AM

To whom it may concern:

Thank you for the opportunity for public input to this urgent order. Please see below comments and questions.

1. Scope of framing questions: all framing questions are thoughtful and necessary
 - I'd like to point to a sector easily left out: buildings & energy, especially public school buildings. Using a big chunk of municipal energy and funds, this could be an easy fix, if energy efficiency and AC/HVAC updates are supported. Keep in mind peculiar situations (think: municipal utility, not part of Energize CT etc) and mind sets (think: not willing to give up authority in PPA or other agreements)
 - also, make sure public health (ie. mosquitos, heat/ drought, clean air and water, healthy food etc)
 - I'd like to add in "sustainably" in question 5: How can we protect and SUSTAINABLY harness our natural resources...

2. Working groups: as to resource limitation, add in more members of the public (eg public scientist, public researcher, public interest groups), but make sure there is strong leadership in terms of agenda and getting things done.

3. General comment: sounds all good, but time frame is too long. THIS IS AN EMERGENCY!

Thank you for taking up this urgent matter and please, hurry!

Respectfully,

Adelheid Koepfer
Wallingford, CT

From: [Andrew Lopez](#)
To: [DEEP ClimateChange](#)
Cc: [Maggie Redfern](#)
Subject: Comments on Executive Order No. 3
Date: Thursday, October 31, 2019 12:54:29 PM

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3 to strengthen Connecticut's commitment to a decarbonized electric grid and support our state's efforts to combat climate change.

As part of Executive Order No. 3, Gov. Lamont indicated he would expand and strengthen the Governor's Council on Climate Change (GC3). The original GC3 was instrumental in setting Connecticut's carbon reduction goals, but that is not to say it is beyond improvement.

I believe the GC3 should 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. These groups often face the brunt of pollution and climate change, but they are often left out of decision-making processes aimed at addressing these issues. If the GC3 is to truly offer guidance on addressing the impact of climate change, it must first have a full accounting of those impacts from communities that would feel them most potently.

There are many pathways to a zero-carbon future, but the clearest is a commitment to clean energy. Connecticut's recent procurement of 2,000 MW of offshore wind energy is a start, representing roughly a third of our state's energy needs. However, we must be prepared to meet our Renewable Portfolio Standards goals of 40% clean energy by 2030. We should also plan for the decommissioning of the Millstone Nuclear Power Plant in the next ten years. Millstone represents a third of our energy needs. We must plan immediately for a zero-carbon replacement of Millstone in order to avoid the dangerous temptation to turn to fossil fuels like fracked gas to meet our energy needs.

I strongly oppose investment in fossil fuels—such as the new fracked gas power plant planned in Killingly. This power plant would not be in keeping with the Governor's zero-carbon proposal, nor would it help us lower carbon emissions. While I recognize the need for reliable energy even when the wind is not blowing or the sun is not shining, Connecticut should invest in energy efficiency and battery storage. Consuming less in general should also be a public statewide goal.

Connecticut should increase its investments in solar energy, particularly shared solar programs for those who live in apartments, condos, or other facilities where traditional rooftop solar panels would not be feasible. Towns should be placing solar on public buildings and over parking lots. It makes sense to place solar panels in already developed areas, where they will not disturb the hydrology of our already fragile ecosystems on farms, in fields and parks, and on undeveloped land. Currently, our community solar program is burdened by overly restrictive rules such as preventing unused energy from rolling over to subsequent years. There are also restrictive caps on the amount of solar energy participants can procure. Connecticut should loosen the reins on community solar to allow this program to expand, giving more households the chance to tap into clean energy and potentially lower their costs.

Further funding for resiliency and carbon sequestration are equally critical, but funds for land conservation are often the first to be raided in times of budget shortfalls. Forests and open space act as critical carbon sinks. Even urban trees have a very important role to play in cleaning our air, absorbing storm water, calming traffic, and making people feel good and stay cool in the warmer weather. Connecticut should stop diverting funds from programs like the Community Investment Act to ensure we can protect our forests from development.

Connecticut must also think of the broader picture. To fight climate change and build a zero-carbon future, we must be prepared to take bold action. There are a myriad of goals we could set and programs we could expand, including:

- Setting strict energy efficiency standards for buildings to reduce emissions, lower their draw on the electric grid, and reduce energy costs for us all;
- Informing households about energy efficiency upgrades and best practices;
- Creating a Residential Property Assessed Clean Energy (R-PACE) program to assist low-income households with financing energy efficient improvements;
- Increasing our Renewable Portfolio Standard to 100% clean energy by 2050 or sooner;
- Removing nuclear power from the Renewable Portfolio Standard so we can focus on putting it to sleep once and for all in order to move to a safer, cleaner future;
- Dramatically expanding mass public transit opportunities across the state—it is still virtually impossible to get from my home in New London to Hartford to participate in important political processes; the current public transit options for getting from a place like New London to nearby towns such as New Haven and Westerly are quite simply inadequate and must be improved as soon as possible;
- Electrifying a greater percentage of our mass transit—including school buses;
- Making bicycle training a mandatory component of elementary education statewide;
- Requiring that bicycle infrastructure such as weather-proof long-term parking, bike lanes and signage, etc. be included in all new Department of Transportation projects;
- Creating incentives for those who commute by walking, biking, and taking public transit;
- Banning new fracked gas, coal, oil, or other fossil fuel infrastructure development;
- Repealing the Pipeline Tax to prevent utility companies from turning to ratepayers to finance fossil fuel expansions;
- Expanding “mini-grids” and “smart grids” to decentralize our power distribution structure;
- Approving Community Choice Aggregation (CCA) statewide, so towns and counties can make their own choices about obtaining a greater and more diverse mix of sustainably procured renewable energy sources;
- Educating the public on sustainable farming practices like crop rotation and soil management to better preserve lands that act as natural carbon sinks;
- Starting a statewide tree planting campaign with towns and counties agreeing to plant hundreds of new trees each year;
- Making curb cuts, rain gardens, and bioswales a fundamental component of all new development and Department of Transportation projects;
- Turning Department of Transportation lands abutting roadways and highways into carbon sinks with expanded capacity bioswales designed with native plants and trees intended to absorb carbon pollution and stormwater alike.

There is no shortage of steps to take to build the zero-carbon future Gov. Lamont outlined in Executive Order No. 3. This is a wonderful opportunity for Connecticut to earn a reputation

as a national leader in the clean energy future. We could make investments that will not only help us turn back the clock on climate change, but also create green collar jobs and lower our massively high electric rates.

Thank you again for the opportunity to submit these comments.

Sincerely,
Andrew Lopez

Andrew Lopez | Research Support Librarian | Government Documents Coordinator
Charles E. Shain Library | Connecticut College | 270 Mohegan Avenue | New London, CT 06320
(860) 439-2656 | alopez6@conncoll.edu

From: [Judith Lovdal](#)
To: [DEEP ClimateChange](#)
Subject: Solar Incentives
Date: Wednesday, October 30, 2019 1:43:51 PM

Please continue to support individual residences and commercial businesses with incentives to install solar panels- be it roof or field. We should not be decreasing tax breaks or other financial incentives.

From: [Debra Mahony](#)
To: [DEEP ClimateChange](#)
Subject: Climate Crisis
Date: Saturday, November 09, 2019 10:53:25 PM

There really isn't anything that hasn't been said already, thousands of times.
Hopefully everyone involved there, is as terrified as I am.

Please act accordingly!

ForTheWild,
Debra Mahony

From:
To: [DEEP.ClimateChange](#)
Subject: Governor Lamont's Executive Order No. 3
Date: Friday, November 08, 2019 7:44:54 AM

Good day,

I would like to share my thoughts concerning Governor Lamont's Executive Order No. 3 that will enlarge the Governor's Council on Climate Change and transition to a zero-carbon electric grid by 2040.

While I applaud much of what Governor Lamont is doing to reach the goal of greatly reducing our state's dependence on carbon-based energy including his support of wind energy, I cannot comprehend why he or the State of Connecticut can possibly allow the construction of the proposed NTE natural gas (read methane)/diesel plant in Killingly, CT. Reaching the CCC'S goal to make Connecticut carbon-neutral by 2040 will be **impossible** to achieve if we keep constructing fossil-fuel plants. Our state must ban all new fossil-fuel plant construction now including the NTE Killingly plant. To allow increased carbon emissions from new plants makes a mockery of the Governor's stated goal to build a zero-carbon future.

Opportunities to increase our energy-efficiency abound and must be encouraged and financially assisted. Subsidies for companies to put solar arrays over parking lots and big-box stores is an example where the private sector can greatly help us attain our goal. State and private investment have a huge role to play here, and Governor Lamont's connections to the private sector will be most important in all parts of our economy achieving our goals.

State-wide programs encouraging energy efficiency have an important role to play, as well. Protecting programs such as net-metering allow homeowners to actively take part in achieving the Governor's goals.

Other measures such as repealing the Pipeline Tax, insisting that ISO-New England approve only carbon-free energy suppliers, and increasing our state's purchase of open space – a State of Connecticut goal that has not been met and which serves to sequester carbon in a safe and low-cost manner.

Finally, as a society, we have no time to waste in implementing the GC3's goal to transition to a zero-carbon electric grid by 2040. The U.N.'s IPCC October 2018 report stressed that we only have until 2030 to make major changes world-wide to mitigate the changes due to the climate crisis. The 2040 time period is itself inadequate, but it is far better than "business-as-usual".

The State of Connecticut DEEP has a major responsibility in being a leader here. The time is for action, not hesitation and delay.

Thank you for the opportunity to share my comments.

R. Paul Maidment
P.O. Box 335
Pomfret Center, CT 06259

From: [Masino, Susan A.](#)
To: [DEEP ClimateChange](#)
Subject: GC3 comment
Date: Friday, November 08, 2019 6:01:40 PM

Dear DEEP climate change:

In response to your request for comments, I submit public comments in response to Question #1.

1. Please comment on the scope of the framing questions for adaptation and resilience.

Should any of these questions be omitted or reframed?

-

Yes – two suggestions:

- a. **Suggest reframing #2 and/or 3 to ensure that we make decisions based on up-to-date, external, interdisciplinary and especially unbiased science, and also to ensure that unbiased science is represented within the group itself.**

We need to move forward in an unbiased and especially in a “first-do-no-harm” manner. There is a lot of new science and in some cases we need to do less, not more.

We have a chance for CT to shine and rise to the top and do the right thing - not follow the herd, not business as usual. We have a strong and motivated and supportive environmental community and are in an ideal position.

- b. **Suggest adding a bullet point on the priority of protecting natural systems for maximum benefits wherever possible.**

The science is clear from many fields that natural systems are essential. CT signed onto the US Climate Alliance and we agreed to maximize nature-based solutions. We are also a party in a lawsuit about the changes to the Endangered Species Act. The most powerful and immediate solution to both of these issues (carbon, biodiversity) is simply protecting nature. Even if we solve the carbon problem we are literally dead without nature and biodiversity. High priority as outlined here <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full> and also as a goal of the Pollinator Pathway which already has many towns as members.

-

Are there any additional questions that should be asked?

Yes – four suggestions to add or integrate:

- a. **What are the solutions that cost little and have few or no downsides?**

We need to do the best things as much as possible and start these as soon as possible. Some of the

small and simple changes may be less sexy but the most impactful (like energy efficiency). Some are quick and easy to implement. Some could even save money. Anything that helps and is quick, cheap and effective is a policy win for the planet and for CT. We should prioritize and mobilize solutions accordingly.

In terms of simple steps that have few or no downsides: we should maximize free nature-based services, and should not spend any public money on anything that would take us in the wrong direction. Significant climate impact could be defined as a criteria for budget approval so that we reevaluate and stop subsidizing anything that is taking us the wrong direction.

b. How can we evaluate negative emissions from our land to CT achieve our ambitious emissions goals?

This is low hanging fruit toward our goals. New techniques make this possible.

c. Related to above - how can we maximize the ability of our land to help mitigate the multiple effects of climate change? How can educate the public on this issue?

This is related to question #5, and the benefits are related to multiple values - carbon, flooding, biodiversity, food, health, local resources etc. Biodiversity must be high on the list and we need to immediately maximize self-sustaining native ecosystems across the landscape.

Annual sequestered carbon is not counted and not maximized. Flood risk not minimized. Spreading invasive species is not minimized. Etc. So there are multiple values to maximize on public land that we already control. But most land is owned privately so this is a public education issue as well - there is a lot of additional potential value on the ecosystem services provided by agriculture, forestry, nature preserves, landscaping, etc. Public education on these issues could maximize these benefits and be another way for CT to shine as a leader.

d. How can we strengthen local resilient economies within CT?

This is a major part of climate adaption. Could be added to question #6.

Local economies helps our rural economies – the most successful rural economies are circular, not extractive. People want to support their community, their people, their land – let’s give them more of an opportunity within CT to do so.

Thank you for your consideration,

Susan Masino

Susan A. Masino, Ph.D.
Vernon Roosa Professor of Applied Science
Trinity College

Charles Bullard Fellow in Forest Research
Harvard Forest / Harvard Medical School

From: [P. McCann](#)
To: [DEEP ClimateChange](#)
Subject: Comments on Gov Lamont's zero carbon Exec Order
Date: Friday, November 01, 2019 5:46:44 PM

- **Invest in clean energy, energy efficiency, and battery storage.** Earlier this year, Connecticut issued a procurement for 2,000 MW of offshore wind energy. That represents a third of our energy needs, and it's a significant investment in clean energy. But we can do more. The cleanest energy is the energy we don't use, and energy efficiency both draws down the demand on our electric grid while helping households afford their energy bills. Meanwhile, battery storage will allow us to power our homes and businesses with clean energy even when the wind isn't blowing or the sun isn't shining.
- **Ban new fracked gas, coal, oil, or other fossil fuel infrastructure development.** Before the Governor issued his executive order, the Connecticut Siting Council approved a fracked gas power plant at Killingly. This plant would be operational well past 2040, and spewing carbon and greenhouse gases into our air. Additionally, the Pipeline Tax remains on the books despite broad support for repealing it. This tax would allow Eversource or other utilities to charge ratepayers directly to build a new fracked gas pipeline. These expenses aren't in keeping with the Governor's executive order and shouldn't proceed.
- **Fund open space and forest preservation programs.** Forests are critical carbon sinks, but programs like the Community Investment Act are often the first to be raided during budget shortfalls. We need to stop diverting funds from conservation programs and start investing in open space.
- **Support resiliency measures to protect against flooding, storm surges, and other weather events.** We're already feeling the effects of climate change, and it's more cost-effective to invest in resiliency instead of repairs. We need to protect our vulnerable coastline communities as well as our cities, which requires both investment as well as community and stakeholder involvement.
- Live up to the memorandum of understanding signed with 7 other states to get 2.2 million electric vehicles on the roads. We are half way to the deadline in time but only 6% of the way there in number of EVs. We need 150,000 EVs on CT roads by 2025. The best way to do that is to allow the world's largest EV maker, Tesla (an American car maker) to sell their vehicles in our state.

[Sent from Yahoo Mail for iPhone](#)

From: [Edmund McWilliams](#)
To: [DEEP ClimateChange](#)
Subject: Connecticut's Future
Date: Thursday, October 31, 2019 10:09:59 AM

I am a property owner on a lake in northeast Connecticut - less than one mile from the site of a proposed fracked gas plant that would severely damage the pristine environment of the lake - and more broadly, the life of the people in Connecticut's "last green corner." There is already a plant less than four miles from the site of the proposed site near Dayville.

I sincerely hope that Connecticut authorities will not allow this plant development to go forward.

I would like to ask in an unrelated area that Connecticut give more attention to conservation, specifically, reducing our use of electric power and also preserving Connecticut's forests, marshes and meadows. This will give support to the fight against climate change.

Edmund McWilliams
co-owner of property at 215 North Shore Road, Dayville Ct.

From: [Cristina Mullin](#)
To: [DEEP ClimateChange](#)
Subject: Public Input on E.O.3.
Date: Sunday, November 03, 2019 8:55:36 PM

Thank you for providing this opportunity to comment.

Your three main themes (science and technology, equity and environmental justice, working and natural lands) and their descriptions are spot on and cover the most important areas. However, the GC3 should be mainly about implementing smart solutions for resilience and less about understanding vulnerabilities. Furthermore, I feel you should spend the most time on the third area (working and natural lands). The state has knowledge and capacity in the first two areas (science and technology, equity and environmental justice) and needs the most work in area 3. There is already an abundance of information on vulnerabilities in Connecticut and your technical and scientific committees working on this know what needs to be done.

Building on this idea, if your questions are ordered based on priority, then I think they should be reversed. Again, studies have already been done to address questions 1-3, and more time should be spent on answering questions 4, 5, 6 and 7 and implementing/designing solutions. That being said, the state will need to work with CIRCA and expand CIRCA's human capacity and development as the states knowledge hub for all areas of climate change and adaptation (human dimensions, modeling, green solutions, energy/emissions, etc.). I think it is important to build on CIRCA as a unique institute that can translate science into action and policy and serve as a resilience knowledge hub for all stakeholders working on climate adaptation.

Also, with regard to state assets and capacities we need to reshape the structure of our agencies, so they are more collaborative and better positioned to implement changes. For example, an All Water agency is needed so that waste, drinking, and storm water management and regulation (and land use – watershed development) at the state level is not separate.

I hope you find these comments useful!

Best,

Cristina Mullin

Cristina A. Mullin

PhD Candidate | Environmental Engineering
University of Connecticut | Storrs, CT 06269
cristina.mullin@uconn.edu

From: [Alison Murdock](#)
To: [DEEP ClimateChange](#)
Subject: Executive Order Number 3
Date: Saturday, November 02, 2019 11:14:39 AM

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm St Hartford, CT 06106

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3.

I have the following comments/recommendations:

1. NO New Fossil Fuel Infrastructure:

There are many alternatives which include BIOGAS. For example, Killingly would be a good place for a BIOGAS fueled powerplant; the egg industry chickens could provide the raw materials and the byproducts sold as fertilizer

2. Increase our Renewable Portfolio Standards goal to 100% clean energy by 2030. 40% by 2040 is way too little, way too late.

3. Invest in Energy efficiency: It is proven that one dollar invested in energy efficiency returns \$4-\$5 in savings! This is a no-brainer.

4. Relax the rules on clean energy production (especially Solar Power installations) that were put in place to protect the utility industry profits. Another no-brainer.

5. Decommission Millstone Nuclear Reactor ASAP after we have replaced the energy it produces with clean renewable alternatives: The inevitable sea-level rise is a clear and present danger to nuclear plants.

6. Acknowledge and End Environmental Racism/Classism: GC3 should include representatives from marginalized and disenfranchised communities.

7. Strengthen protections for Open Space, Forests and Farmland, and promote Regenerative agriculture for carbon sequestration. Crops can be planted under Solar Panels!

8. Fix our waste management processes:

Stop commingling organic waste (ie: food, leaves, grass clippings) with unrecyclable trash; this is a large contributor to methane emissions. This waste can be composted or used as BIOGAS fuel. It only needs a separate collection container at the RRDD facilities.

Get rid of single-stream recycling; it does not work. Dual or multiple stream recycling in our Regional Refuse District Disposal facilities can be done.

9. End routine spraying of pesticides and herbicides and excessive mowing along our highways. Manufacture, distribution and applications of these substances, and mowing, all increase use of fossil fuels.

10. Enact Taxes on Carbon, Methane and other harmful emissions, or, conversely, tax credits for proven clean and green industries.

I can keep going, but you get the gist.

Please be strong and resist the naysayers; together we CAN get through this crisis.

Regards,

Alison Murdock
14 Willow Lane
New Hartford CT

FOR: Katie Dykes - Commissioner, Connecticut Department of Energy and Environmental Protection

RE: Request for Public Comment on the Governor's Council on Climate Change

November 6, 2019

Dear Commissioner Dykes,

New England Forestry Foundation (NEFF) was pleased to learn about Governor Lamont's Executive Order No. 3 and for the opportunity to comment on its implementation. The mission of the Governor's Council on Climate Change (GC3) is highly important; tracking the progress of Connecticut's climate change mitigation and adaptation strategies and guiding efforts through the framing questions will help state agencies and their community partners to better address this existential crisis.

NEFF is a regional conservation organization that works to protect New England's forests and to educate landowners about exemplary forestry practices, as we are doing through our grant partnership with Connecticut's Department of Energy and Environmental Protection (DEEP) to reach landowners about climate adaptation. Now in its 75th year of operations, NEFF owns more than 29,000 acres of land and conserves another 1.1 million acres through conservation easements. Our current focus is on asking and answering the question of how New England's forests can help mitigate climate change. NEFF is advancing restorative forestry practices and mass timber construction as key strategies to leverage forests in responding to global warming. We recently analyzed the carbon benefits of restorative forestry in northern New England forests and found that these practices could sequester the same amount of carbon emitted by all 7 million cars in New England for 20 years. For our comprehensive vision for forestry and mass timber construction as climate solutions, please see [this New York Times op-ed](#).

Our research can inform framing question #2, on improving scientific understanding of climate change solutions in Connecticut, and #5, on natural resource-based mitigation and adaptation strategies. NEFF's analysis of the climate benefits of restorative forestry and mass timber construction indicates there is significant potential to mitigate climate change in the next 20 years if forests are protected from development, managed well, and products are directed toward constructing tall urban buildings from wood rather than concrete and steel. **We suggest that the GC3 include restorative forestry and mass timber promotion as topics for its investigation of mitigation and adaptation policies.**

In September NEFF applied for a USFS Landscape Scale Restoration Grant to continue assessing restorative forestry and mass timber construction as climate solutions in New England. If we are granted this funding, we will extend our recent analysis to include the full forest landscapes of Maine, New Hampshire and Massachusetts. With funding from DEEP, NEFF could include Connecticut in the study. The project addresses the GC3's framing question #2 and #5: it will improve our understanding of strategies to address climate change and of how to leverage natural resources in doing so. **Given your agency's focus on these questions, there is an opportunity to harmonize our efforts, and we at NEFF invite your support as a funder.**

NEFF greatly appreciates its partnership with DEEP and looks forward to future collaborations. Our analysis of restorative forestry and mass timber construction is highly relevant to the GC3's mission. We hope you will join us in researching these strategies and that you will incorporate them into GC3 discussions.

Sincerely,

Robert Perschel

Executive Director, New England Forestry Foundation, rperschel@newenglandforestry.org
(978) 952-6856, ext. 104

From: [Isabel Kirsch](#)
To: [DEEP ClimateChange](#)
Cc: [Albis, James](#)
Subject: Public comment: Executive Order 3
Date: Sunday, November 10, 2019 7:54:32 PM

Hi,

Below are comments on Executive Order 3 from nine New Haven residents, all current students at Yale College. Thank you for your consideration, and please let me know if you have questions about any of the comments.

Best,
Isabel Kirsch

Thank you for putting forward a plan that recognizes the urgency of mitigating and adapting to climate change. Within the Progress on Mitigation Strategies working group, I advocate focusing on carbon pricing. Already recommended in the 2018 GC3 report that the working group will consider, a carbon price is the most effective solution on the table for limiting carbon emissions at the scale needed to prevent catastrophic warming. Determining the feasibility and any potential roadblocks with carbon price implementation should be this working group's top priority and a top priority for Governor Lamont.

-Isabel Kirsch, 2023

Add priorities that address how corporations are responsible for GHGs and other climate change issues. Increase funding that allows for individuals to take steps that can reduce impact on climate change (ie. cleaner choices that may be more expensive)

- Sandhya Kumar, 2023

I think that it's really important to work on infrastructure and creating the jobs that will allow our state and subsequently the whole country to transition to more renewable energy. While mitigation is important, there is no way we can move past simply mitigating the worst of the effects and getting people on board if we do not plan for a future/alternative. In doing so, it is also one of my priorities that people who have been most affected/harmed by policies to this date as well as by climate change in general are included in these efforts.

- Sarah McKinnis, 2022

A carbon tax is a good idea both to prevent pollution and to redirect corporate interests toward the wellbeing of society at large rather than exploitation to uphold their bottom line. I urge Governor Lamont to support large, infrastructural change to reverse the tide of climate change while protecting industrial jobs.

- Liam Elkind, 2021

I think use of fossil fuels can be combated in part by greater subsidization and encouraged use of public transportation. If costs could go down for the users

and efficiency increased, this would make a change at a large scale.

-Victoria Stevens, 2022

I think Gov. Lamont's administration should tackle climate change from 2 directions. The first is educating individuals; on a large scale, individual choices can make a big difference in the fight against climate change. It is hard to do anything if there still exists a debate concerning whether we need to do something or not. Educate people about the existence and the urgent need for climate change. From the other side, Gov. Lamont's administration should also try to target climate change in Connecticut on a larger scale through legislation. A carbon tax, for example, would do a lot to decrease our state's carbon emissions, as would higher incentives to create less waste.

- Bruno Moscarini, 2023

A price on carbon is a critical legislative step toward meaningfully reducing CT's carbon emissions and addressing the urgent threat of climate change. To protect our homes, our jobs, and our future, we must focus our efforts on ensuring that CT's economy and population are safe from the dangers of sea level rise, temperature increase, and other detrimental impacts of climate change. Implementing a carbon price would be a crucially important first step towards safeguarding CT's future, and should be considered the Lamont Administration's top priority to effect significant, lasting change.

- Conrad French, 2022

Carbon pricing or a carbon tax would be the most effective way to fight global warming.

- Lizzie Bjork, 2021

Implement a carbon tax.

- Álvaro Perpuly, 2023

From: [Molly Osborne](#)
To: [DEEP ClimateChange](#)
Subject: Lamont's Exec. Order No. 3
Date: Thursday, October 31, 2019 1:35:59 PM

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3 to strengthen Connecticut's commitment to a decarbonized electric grid.

My husband and I have both bought electric cars and solar panels for our house. We recently went down to the Old Saybrook Electric Car Show and found many people interested and committed to changing their habits in favor of using more clean energy instead of fossil fuels. I don't think it is a stretch for anyone any more to stop using oil powered cars by 2040 as many have already successfully made this transition.

We have been using a geothermal heating system for 20 years and have been eagerly awaiting for others to join us in our fight against fossil fuel dependencies. We have travelled to Europe and been impressed by all the energy efficient houses there. I work for an architect who is building Passive Houses and net-zero homes or ernerfitting older homes to become more energy efficient. We have had the technology to insulate much better than our building codes demand. Now is the time to improve our codes to demand greater efficiency and to take advantage of insulation technologies.

Sincerely,
Molly Osborne
11 S Main St
Essex, CT 06426

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Molly Osborne
Office Manager



35 Pratt Street Essex CT 06426 | 860.767.7540

Response to Request for Public Input to
Governor Lamont's Executive Order No. 3
Concerning the Responsibilities of the Governor's Council on Climate Change
By People's Action for Clean Energy

November 7, 2019

Dear Governor Lamont,

People's Action for Clean Energy (PACE) appreciates the opportunity to comment on the manner in which DEEP and the GC3 will approach the Governor's Executive Order Number 3.

Our comments respond separately to questions posed in the request for public input. We have included these questions in our response for ease of reference.

DEEP Question 1: Please comment on the scope of the framing questions for adaptation and resilience (see prior section). Should any of these questions be omitted or reframed? Are there any additional questions that should be asked?

PACE Response: In addition to the seven questions provided, we suggest adding the following questions:

8. What are the most immediate opportunities for action and how do we initiate action even as we study questions 1 through 7? For example:
 - a. If the Pareto principle applies, 80% of buildings emit 20% of the CO₂. Let us therefore develop an Energy Utilization Index (EUI) for each building (the utilities can do this), and prioritize some allotment of dollars to the buildings which will yield most of the benefit.
 - b. Because the winter peak is an issue that is worsening (while the summer peak is actually decreasing), let us focus on winter thermal efficiency. It is possible that identifying the buildings with the highest EUIs and remediating them may pay multiple benefits.
9. What lessons, examples, and programs can be imported from other states and nations?
10. What barriers to progress exist? For example:
 - a. Does fear of litigation hold back energy work in older buildings?
 - b. Do state building codes make deep energy retrofits unnecessarily complex?
11. What opportunities for interstate cooperation exist?

DEEP Question 2: Please provide comment on the working group thematic areas, as they contribute to the tasks set forth in E.O. 3. Recognizing the resource limitations on managing multiple working groups, should the scope of any of the proposed working groups be adjusted, or supplemented?

PACE Response:

Regarding the working group structure, it must be recognized that some strategies both mitigate and facilitate adaptation (e.g., building efficiency lowers emissions and increases resilience).

- Do not exclude programs that are potentially *destructive* and which run counter to mitigation and adaptation. For example:
 - the National Flood Insurance program facilitates rebuilding in areas that are going to be flooded repeatedly. Stop this.
 - Building new Natural Gas powerplants without consideration for CO2 impact runs counter to the Executive Order. Stop this.

Under the mitigation subcommittee the scope should include:

- Building efficiency
- Grid modernization
- Storage – local behind the meter, local in front of the meter, and centralized

Under the Adaptation and Resiliency Subcommittee the scope should include:

- Microgrid architecture (both engineering and financial)
- Resiliency in public infrastructure – i.e. – transport that can survive, street lights that continue working, etc.
- State and local government buildings leading by example

Respectfully submitted,

Bernie Pelletier, Vice President
People's Action for Clean Energy
PO Box 134
West Simsbury, CT 06092
bernard.pelletier@comcast.net

From: [Micaela Porta](#)
To: [DEEP ClimateChange](#)
Subject: Executive Order 3 to expand GC3
Date: Wednesday, October 30, 2019 12:56:57 PM

We are parents and taxpayers from New Canaan who support the comments submitted by the Connecticut League of Conservation Voters. Let's get this done!

Thank you,

Micaela Porta and A. Victor Alvarez

204 Park Street, unit 16

New Canaan, CT 06840

From: [Beverly Propen](#)
To: [DEEP ClimateChange](#)
Subject: Zero Carbon Future for Connecticut
Date: Wednesday, October 30, 2019 7:08:15 PM

As an environmentalist, a parent and grandparent I am very concerned about the future of Connecticut and our planet. I support numerous environmental and wildlife organizations whose philosophies mirror my own. I attended the 2019 Environmental Summit and I was very impressed with Governor Lamont's environmental goals for Connecticut. I believe that we must preserve our open spaces and forest lands in our state. Connecticut needs a future with all clean, renewable energy sources -NOT more fracking, no more gas or oil pipelines and no more coal fired plants!

Wind and solar energies should be supported whole heartedly! When I drive in Massachusetts, their highways are lined with solar panels! Rhode Island has the first off shore wind farm!

Connecticut should be following these leads. I expect Connecticut to be a leader in zero carbon emissions and clean, renewable energy sources!

Please have Connecticut be in the forefront to tackle climate change!

This is for all future generations!

Respectfully,
Beverly Propen
Orange, CT

From: [Michele M. Riberdy](#)
To: [DEEP ClimateChange](#)
Subject: Gov. Lamont's Executive Order No. 3
Date: Thursday, October 31, 2019 12:34:38 AM

To Whom it May Concern:

I am responding to a call for public comment regarding the aforementioned Executive Order. I am in full support of the State of Connecticut migrating to a zero-carbon grid. I am asking that DEEP consider investing in the following measures:

- Wind energy
- Battery storage to store clean energy
- Banning fracking of ANY kind
- Repealing the Pipeline Tax
- Providing funding for open space and reforestation programs
- Sustainability and resiliency programs to mitigate storm surges, and other natural weather events.

Additionally, I request that community input be greatly considered and the committee and stakeholders comprise respected climate scientists, economists, urban planners, community leaders, and business leaders from across the state.

Respectfully,

Michele M. Riberdy
South Norwalk, Connecticut 06854

From: [michael.rosa](#)
To: [DEEP ClimateChange](#)
Subject: Clean Energy Proposals
Date: Wednesday, October 30, 2019 5:44:00 PM

I stand with many constituents in endorsing the State's long-term plan to combat climate change. Specifically, I support the following:

- ***Investing in clean energy, energy efficiency, and battery storage.***
- Earlier this year, Connecticut issued a procurement for 2,000 MW of offshore wind energy. That represents a third of our energy needs, and it's a significant investment in clean energy. But we can do more. The cleanest energy is the energy we don't use, and energy efficiency both draws down the demand on our electric grid while helping households afford their energy bills. Meanwhile, battery storage will allow us to power our homes and businesses with clean energy even when the wind isn't blowing or the sun isn't shining.
-
- *Banning new fracked gas, coal, oil, or other fossil fuel infrastructure development.*
- Before the Governor issued his executive order, the Connecticut Siting Council approved a fracked gas power plant at Killingly. This plant would be operational well past 2040, and spewing carbon and greenhouse gases into our air. Additionally, the Pipeline Tax remains on the books despite broad support for repealing it. This tax would allow Eversource or other utilities to charge ratepayers directly to build a new fracked gas pipeline. These expenses aren't in keeping with the Governor's executive order and shouldn't proceed.
-
- *Funding open space and forest preservation programs.*
- Forests are critical carbon sinks, but programs like the Community Investment Act are often the first to be raided during budget shortfalls. We need to stop diverting funds from conservation programs and start investing in open space.
-
- *Supporting resiliency measures to protect against flooding, storm surges, and other weather events.* We're already feeling the effects of climate change, and it's more cost-effective to invest in resiliency instead of repairs. We need to protect our vulnerable coastline communities as well as our cities, which requires both investment as well as community and stakeholder involvement.

Best,

Michael Rosa

From: [Valerie Rossetti](#)
To: [DEEP ClimateChange](#)
Cc: ctlc@ctlc.org
Subject: Climate Change Action NOW- No fracked gas plants
Date: Wednesday, October 30, 2019 12:32:25 PM

Dear DEEP:

I have been following the controversy over the Killingly natural gas plant approval. I, too, like many in the environmental community, want to see this action STOPPED. Yes, it might be better than a coal fired plant. Yes, it might provide emergency back-up. BUT, the time is NOW to start acting in accord with a renewable energy future. We can't dawdle anymore in the face of precipitous climate change and unrelenting carbon emissions. We need a zero carbon grid by 2040.

I strongly support:

- investments in energy efficiency: no more fund raids!
- investments in renewable energy: solar, wind
- battery storage
- a ban on new fracked gas, coal, oil plants and no new pipelines
- revision of ISO- New England's procurement policies
- preserving open space and forests to help mitigate our carbon output.

Please re-evaluate your decision to support the Killingly plant.

Valerie Rossetti
88 Kenmore Rd
Bloomfield, CT 06002

Comments regarding Lamont Executive Order 3

Douglas Schwartz
Nov. 8, 2019

I harbor deep concerns regarding various aspects of Governor Lamont's Executive Order 3¹:

- 1) This order (not statute) is anti-democratic and represents a usurpation of the constitutional role of the legislature.
- 2) Because of this, there is a lack of informed public input, through legislative hearings and other venues.
- 3) There has been **zero** discussion of the cost to taxpayers and electric ratepayers, **costs which will be substantial and ruinous** to what remains of the state's economy. Connecticut already pays the steepest electric rates in the lower 48² states, this will only exacerbate the problem.
- 4) Because of this, environmental justice will be subverted. This represents an extraordinarily regressive tax, pushed forward in secret through corrupt entities such as the Connecticut Port Authority and DECD, by **the nation's wealthiest governor**.
- 5) The contentions in the Executive Order that an anthropogenic cause of climate change is an established fact lack objective support. Many dispute this³
- 6) In addition to bankrupting what remains of the state's economy, this initiative potentially jeopardizes federal funding. Recent presidential executive orders⁴, enforcing the 1933 Buy America Act, require agencies of the federal government to ensure American workers and manufacturers benefit from federal expenditures and incentives, rather than massive foreign entities.
- 7) Concerns related to a) solar and b) wind energy generation will be offered. The generous incentives offered by the state and federal governments for investments in renewable energy production have tilted the playing field and attracted many unscrupulous actors, almost entirely from out-of-state or foreign jurisdictions⁵. There is a gold rush in Connecticut to lock down guaranteed high rates of return by hedge funds and sovereign funds. The regulatory regime requires certain amendments to protect the public treasury and the environment.

These points are expanded upon individually below.

1) It is the role of the governor to set policy objectives, but he/she must then allow the legislature to perform its constitutional checks and balances role to ensure the public provides informed input to the decision making process, both directly through venues such as open hearings and through our elected representatives. In a sane state, there would be an investigation into how we came to have the highest electric rates in the lower 48 and **what can be done to reduce them**, rather than continuing to cause them to sharply rise. The public is

¹ <https://portal.ct.gov/-/media/Office-of-the-Governor/Executive-Orders/Lamont-Executive-Orders/Executive-Order-No-3.pdf>

² https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_5_6_a

³ <https://web.archive.org/web/20110412094744/http://www.heartland.org/events/NewYork09/proceedings.html>

⁴ https://www.ct.gov/csc/lib/csc/pending_petitions/3_petition_1301through1400/pe1354/kars/pe1354-20190319-karsexhibit-exorder13858.pdf

⁵ https://www.ct.gov/csc/lib/csc/pending_petitions/3_petition_1301through1400/pe1354/kars/pe1354-20190319-karsexhibit-cfsownership.pdf

neither stupid nor suicidal, in spite of what **elites such as the governor** might believe. Only once, at the very end, does the Notice of Request for Public Input mention “General Assembly,” and then only to inform the leaders of relevant committees, after the fact, of what the executive branch has decided. So much for democracy and public participation. Obviously, **the public is considered an impediment, not a participant, to this process.** *De facto* legislation by executive fiat is dictatorship.

2) If the governor is so confident of public support for this initiative, why the great fear of holding actual public hearings, rather than the intellectually insulting “informational” meeting held on September 17, 2019 in New London? Those who think this is only a New London issue will soon be sorely surprised when their electric bills arrive early in the next decade. Rhode Island (first in the nation with offshore wind) ratepayers were not happy when their costs jumped 20% overnight⁶. And that was for only five turbines. It is more than obvious that the governor fears public disclosure and discourse. But **his great wealth insulates him from the daily concerns of most of the electorate.**

3) When the state income tax was implemented, the number of state workers doubled in a few short years. We have been paying for them ever since. With the erection of the southern border wall, the influx of illegal immigrants into our state will surely slow to a trickle. Then the rate of exodus from Connecticut to lower tax jurisdictions will become far more evident and consequential to those remaining. Leaving remaining state residents with an even steeper tax burden. This has long since become a vicious cycle which does not end well. Along comes Lamont, to throw gasoline on this fire, in the form of numerous new revenue sources, rather than spending reductions - which would require a backbone. **This initiative represents a massive tax increase in the form of electric rate surcharges.**

There has been zero public discussion of this fact, by design. The public document⁷ which purports to quantify the results of a wholesale move to renewable energy production and electric vehicles is a joke. Not only does it omit reference to how much our electric rates will soar, but it fails to note the obvious to all informed observers: If electric vehicles are adopted *en masse*, this will require a massive investment in electricity production to meet the increased demand, an investment which is unreasonably large. Nor is there any recognition in the “study” that renewable energy is not dependable 24/7 and requires backup production from traditional sources, absent development of viable and economical battery storage technology.

4) Environmental justice (which is - and will be - actionable in the federal courts and regulatory framework) requires initiatives such as this to not disproportionately impact the least among us. How could this do anything but fall hardest on the shoulders of those already struggling to make ends meet? It is fine to maintain in the Notice of Request for Public Input that anthropogenic global warming and the carbon footprint issues are settled scientific fact, but without factoring in the cost, the cost, the cost, this is only sophistry at its crudest and most transparent. And armies of politicians, lobbyists, attorneys and major investors are getting rich off all this.

5) The request for public input claims, *inter alia*, “rising sea levels and flooding, increasingly powerful storms, extreme heat events, . . .” These three baseless contentions will be addressed in turn.

a) Sea levels have continuously risen since the Last Glacial Maximum (~24,000 B.P.), by a magnitude of approximately 300 feet. The rate of rise has tapered in recent millennia. Our planet remains in an

⁶ <https://www.electricchoice.com/electricity-prices-by-state/>

“The state that saw the great increase in prices for electricity is Rhode Island. Rhode Island customers are paying nearly 20% more for electricity in 2018.”

⁷ THE ECONOMIC AND FISCAL IMPACTS OF CONNECTICUT’S GREENHOUSE GAS REDUCTION STRATEGIES
<https://www.ct.gov/deep/lib/deep/climatechange/remi.pdf>

ice age, with ice at the poles, something which has occurred a minority of the time in the past 500 million years. Until recently in human evolution, no one has been inane enough to contend humans are responsible for any of this or are not powerless to counteract such global (indeed ultimately solar system scale) forces driving long-term climate changes.

b) Where is the data to support the contention of increasingly powerful storms? The great New England hurricanes of the 17th through 20th Centuries⁸ surely dwarf any in the past quarter century.

c) Where is the data to support the contention of extreme heat events? The converse is true for this century (now 20% over), in Connecticut and globally.

Where we sit today was covered by a mile or two of ice 24,000 years ago⁹. Is it a good or bad thing this ice melted? Were humans the cause of this melt? Current atmospheric CO₂ levels stand at around 340 ppm. The optimal concentration for plant growth is on the order of 1,000-3,000 ppm¹⁰. The Earth has experienced intervals at least as high as 4,000 ppm¹¹. Was any of this caused by anthropogenic actions, tens of millions of years before our species evolved?

6) As troubling as all of the above might be, even more concerning is the recent history of **governmental lies, fraud and corruption** surrounding the recent history of this initiative in Connecticut. Some of this activity rises to the level of being prosecutable, civilly and criminally, under the RICO statute. It is deeply troubling that there has been no effort to prosecute the individuals involved in this clear criminality. The converse is true. There has been an effort to sweep these matters under the rug bed. There can be no doubt there is an ongoing federal investigation into these matters, given the level of public scrutiny and outrage they have received, as distinct examples of honest services fraud have become public. *Quis custodiet ipsos custodes?* In this instance, the answer is not the state, which is a party to this corruption. As I write, on November 8, the arbitrary deadline of November 1 (the end of Mr. Kooris' "45-day window, at best") has come and gone without consequence, *i.e.*, **he lied** at the insulting public "informational" session held on September 17, 2019 in New London. This is known in the courts as fraud, which is prosecutable under the RICO act. The secret agreement with Orsted remains secret. The million dollars in legal bills are not even to be read by the public, let alone us to read the actual output of these \$800/hour thieves, Not one person can (or has made any effort) to inform the public of what all this might cost in terms of higher electric rates. Some of those, at the highest levels, directing this might wish to consult objective criminal defense counsel before proceeding further. Anyone who considers it inconsequential to fraudulently deceive in the context of tens of billions of dollars, faces potential substantial criminal liability.

Many of us in the New London region recall the last assault by Hartford on New London's resources, then, as now, led by a *consigliere* in the form of the deputy DECD commissioner, when the State Pier and Fort Trumbull neighborhoods were illegally seized by Hartford¹². In that incident a governor, *et al.* went to prison and over 80% of the states (but not Connecticut) wound up changing their statutes to insulate their citizens from the sorts of abuses experienced by New London residents at the hands of their state officials.

⁸ https://en.wikipedia.org/wiki/List_of_New_England_hurricanes

⁹ http://www.lisrc.uconn.edu/lisrc/geology_simple.asp?p2=5

https://ngmdb.usgs.gov/Prodesc/proddesc_74151.htm Quaternary Geologic Map of Connecticut and Long Island Sound Basin. Stone, Janet Radway, Schafer, John P., London, Elizabeth B. H., DiGiacomo-Cohen, Mary L., Lewis, Ralph S., and Thompson, Woodrow B. 2005.

¹⁰ <http://www.omafra.gov.on.ca/english/crops/facts/00-077.htm>

¹¹ https://en.wikipedia.org/wiki/Carbon_dioxide_in_Earth%27s_atmosphere

¹² Multiple violations of the anti-fraud provisions of CGS Chapter 132, were (and continue to be) committed.

What government creates artificial monopolies and incentives, there are quick fortunes to be made. Lobbyists and governmental staff are circling around this initiative, ready to feast. There is no doubt payoffs, bribes, kickbacks, *etc.* have and will be made in relation to this initiative, that is the nature of the world. To deny this is not credible. The public has already observed some of the corruption and knows the identities of some of those responsible. As a political clue, it might be helpful to review the online comments appended to relevant articles in recent months in The Day newspaper of New London. **The public is clearly and unanimously outraged.** The rare few with the temerity to post comments otherwise are those with something to gain from this fiasco. While the public outrage has so far managed to be contained to the local New London region, once the higher electric bills arrive this will no longer escape the opprobrium of the rest of the state.

7) I support all forms of renewable energy production, especially decentralized, distributed, individual production solutions. I do not support utility-scale incentive programs (investment tax credits, production credits, enterprise zones, *etc.*) that only large, corporate entities benefit from. The latter produces tremendous amounts of corruption, which the rest of us must pay for, through far higher electric rates, increased taxation or both. Market-based solutions are wonderful; government created monopolies and artificial incentives lead to enormous corruption.

SOLAR - The CT Siting Council's practice of requiring petitions for declaratory rulings (as opposed to full applications) must end. **Requiring these proposals to go through the full application process** will bring increased scrutiny, public hearings and municipal participation. ALL the easy to develop parcels for solar farms have already been occupied. Three phase power lines are required, limiting siting to properties adjacent to state routes and interstates. This means environmentally sensitive areas with three phase power are now being targeted, whether in sensitive watersheds, core forests or prime farmland. **The obvious and only place large solar installations should be permitted is atop the roofs of commercial buildings and in parking lot carport installations.** There has been a wholesale failure to protect the public and our watersheds from significant runoff issues associated with solar farms located in the wrong topography, particularly in the eastern half of the state, forcing individuals to litigate what the state should have protected them against. I fully support the 10/30/2019 proposal by Evan Griswold in his comments¹³, which makes way too much sense.

California¹⁴ and other jurisdictions¹⁵ have already moved to classify **photovoltaic panels as toxic waste.** All contain cadmium and other toxic substances¹⁶. The EPA has a testing program to determine if photovoltaic panels are environmentally safe enough to even place into landfills, let alone fragile ecosystems. No solar farm installer will voluntarily submit their panels to such scrutiny. There is currently no viable way to recycle them. All current decommissioning plans associated with solar farms are therefore bogus. Fast buck artists are lying in their decommissioning plans, and all these installations are structured as LLCs or other forms of holding companies. They will all walk at the end of life of these installations, leaving the rest of us to foot the cleanup bill.

WIND - See above for the sorts of corruption these large, utility scale projects engender when an artificial market is created via enormous public benefits. *Inter alia*, such exclusive benefits are unconstitutional in

¹³ https://www.ct.gov/deep/lib/deep/climatechange/eo3/griswold_10_30_2019.pdf

¹⁴ <https://dtsc.ca.gov/photovoltaic-modules-pv-modules-universal-waste-management-regulations/>

¹⁵ <http://environmentalprogress.org/big-news/2017/6/21/are-we-headed-for-a-solar-waste-crisis>
<https://www.forbes.com/sites/michaelshellenberger/2018/05/23/if-solar-panels-are-so-clean-why-do-they-produce-so-much-toxic-waste/#690944ec121c>

¹⁶

https://www.ct.gov/csc/lib/csc/pending_petitions/3_petition_1301through1400/pe1354/kars/pe1354-20190422-kars-brief-response-to-3-26-hearing-testimony.pdf

Connecticut¹⁷. Ignore the obvious petty corruption recently associated with the Connecticut Port Authority. That is a distraction from the industrial-scale corruption underlying the entire thrust of a transparently corrupt effort to award foreign entities a monopoly over our ports and offshore wind production that will obligate CT ratepayers to pay inflated rates for decades to subsidize this scam. Secret negotiations, false deadlines, massive legal bills (gratuitously redacted to eliminate public scrutiny), cash offers to buy off in-state politicians, use of Washington D.C. attorneys, etc. are hallmarks of corruption on a scale appropriate to a proposal that will cost the rest of us tens of billions¹⁸ over its lifespan. The Day newspaper of New London has recently developed a profitable sideline in regaling its readers with tales of increasingly remarkable and bold corruption associated with this proposal. This executive order will ensure them continued revenues for many years into the future.

Douglas Schwartz
Groton

¹⁷ **ARTICLE FIRST. DECLARATION OF RIGHTS**

That the great and essential principles of liberty and free government may be recognized and established,

WE DECLARE:

SEC. 1. All men when they form a social compact, are equal in rights; and **no man or set of men are entitled to exclusive public emoluments or privileges from the community**

¹⁸ Perhaps more, but we have no way of knowing due to the secrecy surrounding this proposal.

From: [Marty Sellers](#)
To: [DEEP ClimateChange](#)
Subject: Killingly Fracked Gas Power Plant
Date: Sunday, November 03, 2019 11:23:09 PM

I am very opposed to the power plant scheduled to be built in Killingly that will be powered by fracked gas. This plant should never have been approved in the first place because it is going to be powered by gas which is produced by fracking which we all know is harmful to the environment. Putting this plant in Killingly just adds insult to energy because Killingly is part of the quiet corner of the state which is also the clean corner of the state. Eliminating this plant will certainly cut down on the amount of pollution in the clean and quiet corner.

Thank you for your attention to this matter,
Margaret L. Sellers



*P.O. Box 270595
West Hartford, Connecticut 06127
connecticut.sierraclub.org*

On behalf of its more than 50,000 members and supporters, Sierra Club Connecticut respectfully submits the following comments in response to the Connecticut Department of Energy and Environmental Protection's (DEEP's) Notice of Request for Public Input on Governor Lamont's Executive Order No. 3 (EO3).

Sierra Club Connecticut supports the Governor's commitment to mitigating and adapting to climate change and protecting vulnerable communities and natural resources that are disproportionately impacted by the effects of climate change. For more than a decade, Connecticut has been putting policies on the books and identifying strategies to address climate change, yet we have not taken the urgent action needed to transition to a decarbonized economy. Given EO3's directive to DEEP to "analyze pathways and recommend strategies for achieving a 100% zero carbon target for the electric sector by 2040," it is critical that the state not endorse actions today that will cripple the viability of these pathways and strategies in the future. As New York recently required in its Climate Leadership and Community Protection Act, Connecticut must ensure that all agency action, from permitting to rulemaking, be evaluated based on its consistency with Connecticut's 2030 and 2050 climate commitments and the achievement of 100% zero carbon electricity by 2040. There is no time to wait. We recommend that the Governor, DEEP, and the Governor's Council on Climate Change (GC3) prioritize immediate actions including:

Pro-actively decrease the use fossil fuels

There is a growing disconnect between Connecticut's goals and strategies, as articulated in the GC3 December 2018 recommendations for Building a Low Carbon Future for Connecticut: Achieving a 45% GHG Reduction by 2030 and EO3, and the current actions that the agency is taking, particularly with regard to gas. The Governor, DEEP and the GC3 must address and remedy this disconnect now.

Earlier this year, DEEP endorsed the siting of a third large combined cycle fracked gas plant in Connecticut¹ while denying requests by the applicant to incorporate enforceable greenhouse gas emission limits into the facility's air operating permit. DEEP is now proposing to issue an air permit for another gas plant without apparent consideration of or limitation on the facility's greenhouse gas emissions.² In addition, Connecticut statutes encourage the expansion of fossil fuels with laws on the books that allow ratepayers to be billed to expand pipelines, convert customers, and subsidize gas equipment and appliances. Methane leaks from gas pipelines and gas infrastructure are speeding up climate change.

¹ Ltr. from Frederick L. Riese, Senior Env'tl. Analyst, DEEP, to James Murphy, Acting Chairman, Connecticut

² CT DEEP, Notice of Tentative Determination to Approve Four Point Source New Source Review Permit Applications from NRG Curtailment Solutions, Inc., Application Nos. 201903915, 201903921, 201903922, 201903923 (Sept. 30, 2019), available at https://www.ct.gov/deep/cwp/view.asp?a=2586&Q=610100&deepNav_GID=1511



We recommend:

- A moratorium to end the development of new fossil fuel generation in Connecticut;
- Removing incentives for expansion of existing gas interconnections and gas infrastructure;
- Curtailing incentives for gas efficiency measures (e.g., replacement of gas-burning appliances) that will prolong dependence on gas;
- Winding down gas companies on a time table consistent with Connecticut's climate commitments. As the state achieves its goals for beneficial electrification in heating, it will be necessary to retire the gas system in an orderly and equitable fashion. California commissioned a study that identifies issues that must be addressed in this process;³ and
- Requiring that permits, licenses, and other administrative approvals and decisions, including but not limited to the execution of grants, loans, and contracts, all state agencies, offices, authorities, and divisions shall consider whether such decisions are inconsistent with or will interfere with the attainment of the statewide greenhouse gas emissions limits established in the Global Warming Solutions Act or with the achievement of 100% zero carbon electricity by 2040.

Implement and report on progress and impact of GC3 recommendations to increase energy efficiency, beneficial electrification, and behind-the meter solar

Building a Low Carbon Future for Connecticut: Achieving a 45% GHG Reduction by 2030 recommends numerous ways to increase energy efficiency and replace fossil fuels with renewables. These recommendations must be acted on, and this action should result in additionality, building on what Connecticut is already doing. The GC3 must track and report on the overall impact of these efforts as well as the equity impact. With a goal of reducing fossil fuel usage, we recommend prioritizing the following GC3 recommendations, and developing ambitious targets:

- Reduce electricity consumption by 1-2 million megawatt hours by replacing existing inefficient electric-resistance space- and water-heating equipment with high-efficiency renewable thermal technology (RTT). This reduction should be implemented through the Conservation and Load Management Plan and other efficiency-procurement strategies;
- Invest in electric measures that reduce peak demand such as exterior lighting, retail lighting, lighting in state buildings, and high efficiency refrigeration. These type of reductions should be implemented through the C&LM Plan and other efficiency-procurement strategies;
- Ensure a transparent and predictable compensation framework to maintain at least the historical average deployment of 40-90 megawatts of additional residential behind-the-meter renewable energy resources per year. Sierra Club encourages that the

³ https://www.edf.org/sites/default/files/documents/Managing_the_Transition_new.pdf



SIERRA CLUB
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historical average be a floor and that Connecticut aim for much higher behind-the meter renewable deployment to meet the 100% goal;

- Prioritize building envelope improvements and expand access to thermal energy-efficiency measures through innovative financing options for all income levels;
- Review consistency of energy efficiency cost-effectiveness testing with public policy goals;
- Develop sustainable funding mechanisms to incentivize replacement of fossil-fuel space and water heating with efficient renewable-thermal technologies. Sierra Club encourages the GC3 to adopt an aggressive goal for heat pump conversions (similar to Maine's 100,000 heat pump goal, but calibrated to Connecticut's population and climate commitments).

Reduce transportation pollution

With almost 40% of Connecticut's emissions from the transportation sector it is critical that Connecticut develop strong policies through the multi-state Transportation and Climate Initiative, the EV Roadmap, and the Grid Modernization docket to reduce transportation pollution in a way that is equitable and addresses the disproportionate pollution burden faced by some communities.

Focus on equity and environmental justice

Sierra Club Connecticut welcomes the creation of a working group focused on equity and environmental justice. It is critical that actions to address climate change mitigate pollution and prioritize investment in communities overburdened with environmental and socioeconomic burdens as well as legacies of racial and ethnic discrimination.

This working group should be made up of members of vulnerable communities, and should have input into all recommendations that come from the GC3. Meaningful public input should be sought through a variety of outreach that is accessible to community members. Community meetings should be held at locations and times that allow for community participation and should be culturally competent.

Thank you for the opportunity to provide comment. Sierra Club Connecticut looks forward to taking the necessary steps to transition away from fossil fuels and move to a decarbonized economy that works for all.

Sincerely,

Samantha Dynowski, State Director

Phone: (860) 578-4750 -- Email: Connecticut.chapter@sierraclub.org

From: [Peter Sipple](#)
To: [DEEP ClimateChange](#)
Subject: Please support Gov. Lamont's Great Executive Order
Date: Wednesday, October 30, 2019 12:30:26 PM

- **Investing in clean energy, energy efficiency, and battery storage.** Earlier this year, Connecticut issued a procurement for 2,000 MW of offshore wind energy. That represents a third of our energy needs, and it's a significant investment in clean energy. But we can do more. The cleanest energy is the energy we don't use, and energy efficiency both draws down the demand on our electric grid while helping households afford their energy bills. Meanwhile, battery storage will allow us to power our homes and businesses with clean energy even when the wind isn't blowing or the sun isn't shining.
- **Banning new fracked gas, coal, oil, or other fossil fuel infrastructure development.** Before the Governor issued his executive order, the Connecticut Siting Council approved a fracked gas power plant at Killingly. This plant would be operational well past 2040, and spewing carbon and greenhouse gases into our air. Additionally, the Pipeline Tax remains on the books despite broad support for repealing it. This tax would allow Eversource or other utilities to charge ratepayers directly to build a new fracked gas pipeline. These expenses aren't in keeping with the Governor's executive order and shouldn't proceed.
- **Funding open space and forest preservation programs.** Forests are critical carbon sinks, but programs like the Community Investment Act are often the first to be raided during budget shortfalls. We need to stop diverting funds from conservation programs and start investing in open space.
- **Supporting resiliency measures to protect against flooding, storm surges, and other weather events.** We're already feeling the effects of climate change, and it's more cost-effective to invest in resiliency instead of repairs. We need to protect our vulnerable coastline communities as well as our cities, which requires both investment as well as community and stakeholder involvement.

With great respect for all that you are accomplishing, we will to add our voices to those who seek to pursue these changes as quickly as possible.

Peter and Margaret Sipple
177 State Street
Guilford, CT 06437

From: [Stacey Smith](#)
To: [DEEP ClimateChange](#)
Subject: Climate change education
Date: Wednesday, October 30, 2019 12:21:58 PM

It would be ideal if schools had a curriculum that educated our children on environmental impact so that our youth can take the right steps forward in everyday life.
For example each month every school could take on the same project that greens or decreases the carbon footprint.

Best,
Stacey Smith
Guilford, CT

From: [Meg Smith](#)
To: [DEEP ClimateChange](#)
Subject: PUBLIC INPUT GOVERNOR LAMONT'S EXECUTIVE ORDER No. 3
Date: Wednesday, October 30, 2019 1:10:19 PM

To the committee:

Thank you for the opportunity to comment on the approach of the GC3. My name is Meg Zelickson Smith. I am a resident of Guilford, and I live one mile from the town marina in a condo development next to a marsh and in the flood zone. I see the impacts of sea level rise out my back window each time there is a rain bomb-type storm. While my property wasn't damaged by Sandy or Irene, many areas of my town were.

I don't need to tell you about the local impacts of climate change, or the existential nature of the global impacts. Just today, for instance, we read in the *New York Times* that new research shows that rising seas will erase more cities by 2050 than previously thought. Everything is happening more quickly than previously thought, CO2 emissions are at the highest level ever known to man, and new research will likely continue to add to the understanding and urgency for broad, dramatic action.

While I am pleased that CT desires to take the lead on the climate crisis, that Gov. Lamont issued Executive Order #3, and that one of your key concerns is *(h)ow can federal, state, regional, municipal, and local adaptation efforts best be aligned to maximize impact and benefits?*, there are two aspects of the GC3, and of EO#3 itself, that concern me.

1. **Time.** Time is of the essence when it comes to the climate crisis. The impacts will not wait for a legislative session or complicated governmental process. While the GC3 Key Deadlines and Deliverables are thoughtful and organized, they are should be fast-tracked, and immediately aligned with mandated municipal and local government action. We simply do not have the time to wait over a year (or even slightly less) to take first steps, and our cities and towns need to do the same.
2. **Ambition.** I refer you to one of the most inclusive, no nonsense prescriptions I've seen of "[climate actions that will work.](#)" I also refer you to the author, [Michael Barnard](#), whose clarity and intensity may serve our state well on the CG3. (I do not know the author so this suggestion is completely objective.) Just for reference, the top three climate actions that will work are pasted below. I strongly encourage you to read the entire list.

Electrify everything

Convert all energy services to work directly from electricity instead of fossil fuels. Transportation, industry, and agriculture. All of it. All gas appliances must go. All road transport must be electric. Most trains and a lot of

planes must shift to electric. Electricity creating biofuels or hydrogen for the subset of transportation that can't be electrified. All heat from electricity. The US throws away two thirds of all primary energy, mostly in the form of waste heat from fossil fuels used in inherently inefficient combustion processes. We only have to replace a third of the actual primary energy we use today to maintain our lifestyle and economy.

Overbuild renewable generation

All other forms of generation with the exception of nuclear were overbuilt, so we'll do the same with wind and solar, and they are really cheap, so that is not that expensive. Also a bit of geothermal and some biomass. After all, about \$3 trillion would provide all primary energy for everything the US does today.

Build continent-scale electrical grids and markets

And improve existing ones. HVDC became much more viable with high-speed hybrid circuit breakers in 2011, and is an essential technology for long-distance, low-loss electrical transmission. It can replace some AC transmission and be buried along existing right-of-ways.

I also agree with the comments submitted by CTLCV, particularly their comments against the new fracked gas power plant planned in the aptly named Killingly. It is so contrary to the spirit of EO#3 that I wonder about CT's real commitment to 100% clean energy, much less anything else.

Respectfully submitted,

--

Meg Zelickson Smith
66 High St, Unit 4
Guilford, CT
914-844-0402

From: [Mary Stevens](#)
To: [DEEP ClimateChange](#)
Subject: Comments to GC3
Date: Thursday, October 31, 2019 12:36:08 PM

Dear DEEP,

I applaud the Governor's plan to decarbonize CT by 2040. Here are some important steps that must be taken:

1. Invest in Clean Energy and battery storage as well as energy efficiency incentives
2. Stop any fossil fuel infrastructure NOW including the fracking plant at Killingly. There is no place for new fossil fuel plants of any kind anymore. We have to make the transition to a carbon-free grid ASAP in order to reach goals and stop the worst effects of global warming
3. Fund green space. Trees are carbon sinks!!!!

Thank you,

Mary K Stevens
66-1 High Street
Guilford, CT 06437
206-769-9218
mk-stevens@live.com

To the Governor's Council on Climate Change

November 8, 2019

Ref: Comments on Executive Order No. 3 (E.O. 3)

Dear Climate Change Council/Committee:

I was told about this executive order and the option to comment three hours before the comment deadline, forgive me if I am misinterpreting what the executive order entails.

Regarding the building of a low carbon future. As a group, please do everything you can to make sure projects toward this goal provide *true, real* reductions. To fight climate change we desperately need to avoid projects that "feel good", yet can actually have a negative return, minimal return, or a high cost to the environment. As an example, removing and replacing forested land with solar farms, at the very least, has a minimal carbon reduction at the expense of other important sustainable values.

I understand it can be difficult to determine if stated carbon reduction values are real for various types of green energy. Political motivation, financial gain, and the simple drive to do something, can blind us to inflated numbers and false claims of beneficial effects. I would hope the committee has sufficient staff or the tools required to independently review each type of carbon reduction plan in full to make sure the costs vs. returns are true. I *think* I see and understanding of the need for this balance in the scope of the executive order, and people seem to be catching on, but have a healthy skepticism given past history across the country (and the world).

I consider myself as green as they come and well educated. When I look close at what is currently happening in the name of green energy it's almost unbearable to watch. I hope Connecticut can take the lead by doing it right.

Thank you –

Joel Stocker
Waterford, CT



WESTPORT, CONNECTICUT

SUSTAINABLE WESTPORT ADVISORY TEAM
David Mann, *Chair*



November 8, 2019

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm St
Hartford, CT 06106

Dear Commissioner Dykes,

The Town of Westport thanks you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3 strengthening our state's "to transition to a decarbonized economy and enhance the state's resiliency to the impacts of climate change."

In 2015 Westport's First Selectman Jim Marpe committed our Town to becoming a net-zero community by the year 2050. In 2017 the Representative Town meeting passed a resolution confirming this as Town policy and the goal was written into our 2017 Plan of Conservation and Development. We believe that the administration setting similar bold goals to address our climate crisis is critical. As such, we appreciate the Governor's directive to decarbonize our state's electric grid.

In response to DEEP's Notice of Request for Public Input on the Governor's Executive order Westport has reviewed the order in light of the Town's goals to be a net-zero where the community has reduced its impacts across energy, water, and waste so that they are sustainably managed, using approaches that are economically viable, of social benefit, and environmentally responsible. In light of this review, we concur with the public comment of Connecticut League of Conservation Voters (here attached) and strongly encourage you to consider their positions including, but not limited to a strong opposition to any future fossil fuel generation capacity in the state (including the planned Killingly plant), investment in decentralized energy storage technologies to complement increased renewable energy generation capacity, support for shared solar, the electrification of our transportation systems, the importance of energy efficiency programs, equity actions to protect our most vulnerable citizens, and critical resiliency measure for our coastal communities.

Thank you again for this opportunity and for your consideration of Westport's comments.

Best regards,

David Mann



October 29, 2019

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm St
Hartford, CT 06106

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3 to strengthen Connecticut's commitment to a decarbonized electric grid and support our state's efforts to combat climate change. We at the Connecticut League of Conservation Voters (CTLCV) are excited to see the administration setting bold goals in the face of the looming threat of our climate crisis.

Governor's Council on Climate Change

As part of Executive Order No. 3, Gov. Lamont indicated he would expand and strengthen the Governor's Council on Climate Change (GC3). The original GC3 was instrumental in setting Connecticut's carbon reduction goals, but that is not to say it is beyond improvement. Advocates including CTLCV were quick to indicate that many important voices were not included on the GC3. We hope to see that rectified here.

CTLCV strongly recommends 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. These groups often face the brunt of pollution and climate change, but they are often left out of decision-making processes aimed at addressing these issues. If the GC3 is to truly offer guidance on addressing the impact of climate change, it must first have a full accounting of those impacts from communities that would feel them most potently.

Decarbonizing Our Electric Grid

CTLCV also applauds the Executive Order's directive to decarbonize our state's electric grid. That is a laudable goal, and one we hope to see reflect Governor Lamont's pledge to transition our state to 100% clean energy.

There are many pathways to a zero-carbon future, but the clearest is a commitment to clean energy. Connecticut's recent procurement of 2,000 MW of offshore wind energy is a fine start, representing roughly a third of our state's energy needs. However, we must be prepared to meet our Renewable Portfolio Standards goals of 40% clean energy by 2030. We should also plan for the potential decommissioning of the Millstone Nuclear Power Plant in the next ten years. Millstone represents a third of our energy needs, and is currently the largest provider of zero-carbon electricity in the state. If Connecticut does not put a plan in place now, we could be forced to turn to fossil fuels like fracked gas to meet our energy needs. That is not in keeping with Executive Order No. 3 or our previous commitments.

CTLCV strongly opposes investments in fossil fuels—such as the new fracked gas power plant planned in Killingly. This power plant would not be in keeping with the Governor's zero-carbon proposal, nor would it help us lower carbon emissions. While we recognize the need for reliable energy even when the

wind is not blowing or the sun is not shining, CTLCV urges Connecticut to invest instead in energy efficiency and battery storage. By both decreasing the amount of energy we use and investing in new ways to store electricity, we can ensure reliability even during peak times without turning to fossil fuels.

These investments in energy efficiency should include equal access to programs, regardless of heating fuel type. Connecticut should also seek to expand access to energy efficiency programs by considering ways to implement automatic enrollment. For instance, households eligible for SNAP, WIC, or HUSKY benefits could be automatically enrolled in our energy efficiency programs. Not only would this reduce the draw on our electric grid, it could reduce the cost of electricity for the roughly 400,000 households struggling to pay their energy bills.

CTLCV also encourages Connecticut to increase its clean, renewable energy procurements. Massachusetts, Rhode Island, and other New England states have begun construction on their own offshore wind facilities. We could look for ways to partner with the other states of ISO New England to issue a joint procurement of offshore wind, thus driving costs down while ensuring we can all meet our energy needs.

Additionally, Connecticut should increase its investments in solar energy, particularly shared solar programs for those who live in apartments, condos, or other facilities where traditional rooftop solar panels would not be feasible. Currently, our community solar program is burdened by overly restrictive rules such as preventing unused energy from rolling over to subsequent years. There are also restrictive caps on the amount of solar energy participants can procure. Connecticut should loosen the reins on community solar to allow this program to expand, giving more households the chance to tap into clean energy and potentially lower their costs.

Investments in clean energy are certainly important, but further funding for resiliency and carbon sequestration are equally critical, but funds for land conservation are often the first to be raided in times of budget shortfalls. Forests and open space act as critical carbon sinks. Connecticut should stop diverting funds from programs like the Community Investment Act to ensure we can protect our forests from development.

Furthermore, we must ensure our towns and communities—particularly on our vulnerable coastlines—have the resources they need to make necessary upgrades and improve natural buffers. Hurricanes and superstorms have ravaged Connecticut in the past. Climate change ensures these storms will hit again, and the damage could be catastrophic. It is much more cost-effective to invest in resiliency now rather than major repairs in the wake of a superstorm.

Connecticut must also think of the broader picture. To fight climate change and build a zero-carbon future, we must be prepared to take bold action. There are a myriad of goals we could set and programs we could expand, including:

- Setting strict energy efficiency standards for buildings to reduce emissions, lower their draw on the electric grid, and reduce energy costs for us all;
- Informing households about energy efficiency upgrades and best practices;
- Creating a Residential Property Assessed Clean Energy (R-PACE) program to assist low-income households with financing energy efficient improvements;
- Increasing our Renewable Portfolio Standard to 100% clean energy by 2050 or sooner;
- Electrifying a greater percentage of our mass transit—including school buses;
- Banning new fracked gas, coal, oil, or other fossil fuel infrastructure development;

- Repealing the Pipeline Tax to prevent utility companies from turning to ratepayers to finance fossil fuel expansions;
- Expanding “mini-grids” and “smart grids” to decentralize our power distribution structure;
- Educating the public on sustainable farming practices like crop rotation and soil management to better preserve lands that act as natural carbon sinks;
- Mandating community and stakeholder involvement in the planning and implementing of resiliency measures;
- Monitoring state agencies for compliance with Lead by Example programs and holding them accountable should they fall short.

There is no shortage of steps to take to build the zero-carbon future Gov. Lamont outlined in Executive Order No. 3. If the will is there, Connecticut could cement our standing as a national leader in the clean energy future. We could make investments that will not only help us turn back the clock on climate change, but also create green collar jobs and lower our massively high electric rates.

Thank you again for the opportunity to submit these comments. We at CTLCV look forward to working with you and the entire Lamont Administration in the days to come.

Sincerely,



Amanda Schoen

Deputy Director
CTLCV

From: [Tom Tella](#)
To: [DEEP ClimateChange](#)
Subject: Comment on GC3 Council
Date: Tuesday, November 05, 2019 8:47:59 AM

I am the president of a small land trust, the Wolcott Land Conservation Trust of Wolcott, Connecticut. I strongly recommend the inclusion of all land trusts in Connecticut, large and small, in an advise-and-consent capacity to the GC3. Our properties, along with State forests and parks, represent the backbone of forested land in Connecticut and therefore will be a major part of a solution or mitigation to the threat of climate change.

Thomas Tella
Wolcott, Connecticut

From:
To: [DEEP.ClimateChange](#)
Subject: Suggestions
Date: Wednesday, October 30, 2019 3:41:34 PM

While I appreciate CT's efforts at recycling, much more can be done. For instance, plastic items that can fall through a 2" by 2" grid are not accepted. I use many nutritional supplements, and most of them come in containers that are just under 2"x 2". The company agreed to let me return the empty containers to them, provided I pay the shipping, which I did (and can't afford!). They say they will recycle them, but I can't be sure they won't simply discard them. Plastic prescription bottles: At a DEEP lecture, I was told that one CVS in my town (Southington) would accept them for recycling, so I tried to do that, but they knew nothing about it. In the end, they did take the ones I had brought, but probably won't continue to do so.

I previously lived in CA, and they have an excellent (though not perfect!) recycling program. eg Paper may be wrapped and tied with string, or placed in paper bags. Shredded paper may be placed in clear plastic bags and tied.

"Beyond the Bin" is very helpful, but I had to spend 3 hours yesterday going from place to place to recycle various things. That's not realistic. Perhaps monthly or bimonthly collections in each town of items that can't currently go in the bins? (Drive down rows of stations for each type of item. Large signs at each station and at the beginning of each row re items. Possibly maps and instructions, info at entrance and in advertisements ahead of time.)

How about giving businesses incentives to replace plastic packaging with sustainable alternatives?

Thank you for this opportunity!

Aline Tetrault



***The Nature Conservancy
55 Church Street
New Haven, Connecticut 06510
203-568-6297***

November 6th, 2019

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm Street
Hartford, Connecticut 06103

Dear Commissioner Dykes,

On behalf of The Nature Conservancy, I want to commend your agency and the Lamont administration for the thoughtful and comprehensive approach described in the Request for Public Input regarding the implementation of Executive Order 3.

We particularly commend the convening of joint working groups on nature-based solutions for both mitigation and adaptation, and on equity and environmental justice. The charge to those two joint groups as well to the Science and Technology Group and the Adaptation groups capture well the critical issues they will need to address.

It is prudent to explicitly charge the Adaptation Planning Working group and the Mitigation Working Group with reviewing the statewide 2011 Climate Change Preparedness Plan and the 2018 Low Carbon Future report. While both of these reports will require periodic updates, they are both very valuable documents with much information that will remain relevant for many years.

We recommend that the Mitigation Working Group be more explicitly charged with developing recommendations for future policies and actions so that it better reflects the change in the Executive Order to report on “implementation of new and emerging mitigation strategies that maximize adaptation and resilience opportunities while ensuring that the state is on a sustainable path to meet its reduction targets.” Perhaps the recommendation of strategies is an assumed responsibility for the Mitigation Group, but it is not referenced as explicitly for that group or for the Assessing Vulnerabilities for State Assets Group, as it appropriately is for some of the other working groups.

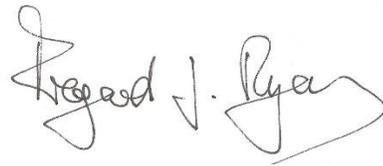
The framing questions for Adaptation and Resilience address critical issues, including the engagement of diverse stakeholders, the prioritization of assistance for vulnerable communities, the utilization and protection of natural resources as a mitigation and adaptation strategy, and funding sources. We recommend that question 6 be understood to include

analysis of previous and current state agency coordination regarding resilience, including a review of the strengths and shortcomings of SAFR, CIRCA, and other related state initiatives. This question should also be understood to mean that state agencies and regional planning organizations become better focused and aligned on supporting efforts by municipal governments to become more resilient.

We also recommend that a framing question be included to address the ways in which different financial factors, including municipal Grand List considerations and federal insurance programs affect attitudes and practices regarding land use and adaptation measures in current and future vulnerable areas. We realize that time constraints on both DEEP staff and GC3 members may preclude analysis of these and some other important factors, but recommend that in such cases, the council at least acknowledge such factors.

Thank you for the extensive attention your agency and the administration is devoting to these critical issues, and for reconvening and expanding the GC3. Please know that The Nature Conservancy stands ready to assist the GC3 in any way we can.

Sincerely,

A handwritten signature in black ink that reads "Frogard J. Ryan". The signature is written in a cursive style with a large, stylized initial "F" and a prominent "R".

Frogard Ryan
State Director

From: [Ellen Thomson](#)
To: [DEEP ClimateChange](#)
Subject: Public comment
Date: Wednesday, October 30, 2019 2:14:40 PM

The State should do everything it can to invest in clean energy, energy efficiency and battery storage. We should support financial incentives to families, institutions, municipalities for converting to clean energy and/or making energy efficiency improvements.

We should ban all new fossil fuel infrastructure development.

We should invest in clean/er energy public transportation.

Ellen Thomson
250 Salmon Brook St.
Granby, CT 06035

From:
To: [DEEP.ClimateChange](#)
Subject: Governor Lamont's Executive Order No. 3
Date: Thursday, November 07, 2019 3:57:19 PM

Hello,

Here are my comments on Governor Lamont's Executive Order No. 3, to expand the Governor's Council on Climate Change and to transition to a zero-carbon electric grid by 2040.

1. It is imperative to stop building fracked gas, coal, oil, and other fossil fuel infrastructure. This needs to happen immediately. Do NOT build NTE's Killingly dual fuel fracked gas/diesel power plant. Do NOT expand the pipeline spur to supply that plant. We cannot afford the emissions from that plant, or any other currently proposed or planned fossil fuel power plants.
2. Repeal the Pipeline Tax, which allows utilities to charge ratepayers directly to build new fracked gas pipelines. No neighboring state allows this.
3. Invest in carbon-free, renewable energy such as wind and solar.
4. Encourage energy efficiency as a way to reduce energy demand. CL&P used to consider energy conservation a source of power. Use the money which ratepayers are required to pay every month for the purpose for which it was intended - energy efficiency. Stop diverting it for other purposes.
5. In homes that request it, or might benefit from it, install pay as you go electric meters. Consumers would learn very quickly to conserve electricity.
6. Insist that ISO-NE obtain carbon-free energy for all future energy needs, starting now.
7. Stop subsidizing trash to energy plants and wood burning plants. Their emissions are not carbon-free or carbon-neutral.
8. Increase conservation of open space and forests to provide carbon sinks. Stop harvesting trees "to keep the forests healthy." Older trees sequester exponentially more carbon than newly planted trees. We need carbon sequestration now, not in 50 to 100 years. (See *Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good* by William R. Moomaw, Susan A. Masino, and Edward K. Faison, published in *Frontiers in Forests and Global Change*, June 2019.)

Thank you for this opportunity to submit my comments.

Sincerely,
Sandy Tosi
P. O. Box 335
Pomfret Center, CT 06259
tosimaidment@charter.net

From:
To: [DEEP ClimateChange](#)
Subject: Climate Change
Date: Wednesday, November 06, 2019 10:53:51 PM

I am in support of the Gov. Lamont's effort to expand the Governor's Council on Climate Change (GC3) and begin Connecticut's transition to a zero-carbon electric grid by 2040. This is an important step forward in our fight against climate change. I support the wind farm project off the coast of New London, increased public transportation systems that seamlessly move across the state so I do not have to drive to work, funding for entrepreneurs of new uses for recycled products, help for cities to develop curbside compost and separated recycling products and help for residents going solar as well as decommissioning large nuclear power plants and while supporting smaller scale research for SAFE clean energy that Does Not fill our towns and cities with dangerous nuclear waste stored at plants. I support fracking bans, the plastic bag ban, and separate lanes on highways for high speed e-busses with transportation hubs such as those done in Bogotá, Colombia.

Sent from my T-Mobile 4G LTE device

From: [Svetlana Tsalik](#)
To: [DEEP ClimateChange](#)
Subject: Comments on Executive Order #3
Date: Monday, November 04, 2019 7:09:05 PM

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order #3 to strengthen CT's commitment to reducing carbon in order to combat climate change.

I am writing to express my support to the recommendations provided by the CT League of Conservation Voters in their letter to you of October 29.

These include:

- expanding and strengthening the Governor's Council on Climate Change (GC3) to include a more diverse set of voices;
- planning for the decommissioning of the Millstone Nuclear Plant in the next ten years;
- investing in energy efficiency and battery storage rather than in a new fracked gas power plant in Killingly;
- expanding access to energy efficiency to households eligible for SNAC, WIC or HUSKY benefits;
- looking for ways to partner with other ISO New England states to jointly procure renewable energy;
- loosening the bureaucratic reins on community solar programs;
- and stopping the practice of diverting funds from conservation programs like the Community Investment Act

Thank you for the opportunity to submit these comments.

Sincerely,
Svetlana Wasserman
37 Day Road
Greenwich, CT 06831

From: [Sena Wazer](#)
To: [DEEP ClimateChange](#)
Subject: Public Comment on GC3 Council
Date: Friday, November 08, 2019 4:23:07 PM

Dear DEEP,

I am writing to express my opinion about the Governor's Council on Climate Change. My name is Sena Wazer and I am a 15 year old youth climate activists. I have been working on environmental issues since I was 5 years old, and through my experiences I have learned that youth often understand the urgency of environmental issues in a way that adults don't. Additionally, in the case of climate change, young people will be the ones most affected by it as the ones who will inherit this planet. Because of this, I think it is imperative that the GC3 council include a youth member(s). If you have any questions about my comment please feel free to reach out to me.

Best regards,
Sena Wazer

--

253 Maple Rd.
Storrs-Mansfield, CT 06268
[860-931-9346](tel:860-931-9346)

From: [Charlie Weedon](#)
To: [DEEP ClimateChange](#)
Subject: Climate change
Date: Thursday, October 31, 2019 4:33:46 PM

The only way we will create a swift response to the current crises is to halt all capital projects involving fossil fuels. We can lead in that way.

Charlie Weedon
Pomfret CT 06259

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106
DEEP.ClimateChange@ct.gov

November 4, 2019

Dear Commissioner Dykes:

Thank you for the opportunity to comment on the Notice of Request for Public Input on Governor Lamont's Executive Order No. 3. Our comments are as follows.

With regards to the framing questions:

- How do the framing questions relate to the Executive Order (EO)? Sections 4-5 of the Order list the expanded responsibilities of the GC3. If the framing questions are needed, consider linking them closely to the Order (viz. the items under sections 4-5).
- How do the framing questions relate to the Working Groups? Will individual questions be assigned to Working Groups, or will all Working Groups have to answer all questions?
- It may be beneficial to ensure consistency with intent/wording of the Executive Order. (The Notice of Public Input includes at least one inconsistency, stating that that the Order "expands the membership of the GC3 to include... at least five individuals who represent health, equity, affordability or environmental justice." This is not a correct statement.)

With regards to the Working Groups:

- Are the Working Groups intended to relate to the sectors and associated strategies and targets in *Building a Low Carbon Future for Connecticut: Achieving a 45% GHG Reduction by 2030*? If so, and the Groups are charged with monitoring sectoral strategy implementation and emissions reductions, you may wish to create Groups that correspond to these sectors, namely energy, building, and transportation, as well as additional ones as needed (e.g., industry, agriculture). Creating Working Groups with defined ambits will better focus work, engage sectoral experts, and vest groups with ownership and accountability.
- The adaptation Working Groups include one on "State Assets & Operations." Will any of the Groups address impacts on non-state assets and operations? Non-state actors—households and businesses—account for most property and economic activity in the state. Accordingly, households and businesses may be at even greater risk than government from climate change. At least one Working Group should be charged with planning for the private sector, preferably with strong participation by private actors.
- Equity and environmental justice should not be segregated into a separate Working Group but integrated into the activities of all Working Groups.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Francis R. Pickering". The signature is written in a cursive style with a horizontal line underneath the name.

Francis R. Pickering
Executive Director



STEERING COMMITTEE

Ellie Angerame
New CT Farmer Alliance

Joseph Bonelli
University of Connecticut

Bonnie Burr
University of Connecticut

Paul Elconin
Weantinoge Heritage Land Trust

Gordon Gibson
Connecticut State Grange

Eric Hammerling
CT Forest & Park Association

Terry Jones
Jones Family Farms

Kip Kolesinskas
Manchester

Nathan L'Etoile
American Farmland Trust

Robin Lamott Sparks
End Hunger CT!

Elisabeth Moore
Connecticut Farmland Trust

Joan Nichols
CT Farm Bureau Association

Will O'Meara
Land for Good

Amy Paterson
CT Land Conservation Council

Shannon Raider-Ginsburg
CT NOFA

Richard Roberts
Halloran & Sage

Jim Smith
Cushman Farm

Keith Stechschulte
Farm Credit East

STAFF

Chelsea Gazillo - Director
cgazillo@farmland.org

Armando Paolino - Lobbyist

Commissioner Katie Dykes
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

November 8, 2019

Dear Commissioner Dykes,

Thank you for the opportunity to submit public comments on Governor Ned Lamont's Executive Order Number 3 that will strengthen the state's transition to a decarbonized economy and enhance resiliency of our economic, cultural, and natural resources to the impacts of climate change. Our working forest and agricultural lands are essential to this effort, as they have the potential to sequester large amounts of carbon, reduce flood threats, protect water resources, and their products help diversify the economy of Connecticut. The opportunity for increased climate change mitigation and decarbonization, that working lands in Connecticut can provide, must not be overlooked.

Governor's Council on Climate Change

As part of Executive Order Number 3, the Governor has committed to enhancing and expanding the scope of the Governor's Council on Climate Change. The Malloy administration did a commendable job in outlining how the state can achieve a net zero carbon future. However, in the inception of the initial plan many key stakeholders, including the agricultural community, were not included within the original Council.

Farmers, forest landowners, and agricultural stakeholders have a significant role in implementing climate-smart practices on our working lands that help the state mitigate and adapt. Working Lands Alliance strongly recommends that the GC 3 Working and Natural Lands Working Group includes farmers, land trusts, and agricultural service providers, in addition to the climate scientists, representatives from disadvantaged communities, climate activists, planners and community members already identified for their valuable participation in this effort.

Climate Change and Agriculture

Working Lands Alliance also recommends that the scope of the GC 3 Working and Natural Working Lands Working Group include evaluation of how to best utilize our working lands to combat climate change. Climate change threatens



lives, livelihoods, food security, and our economy. It is no longer a distant problem and for farmers there is no more time to waste. However, with support for the continued adoption of climate-smart practices (also called regenerative ag. or soil health practices), agriculture can do its part to cut emissions and begin to pull carbon out of the air and store it. For example, as Dr. Jennifer Moore-Kucera (climate director for American Farmland Trust and soil health expert) recently testified to the U.S. House of Representatives, “If U.S. farmers adopted cover crops on 25% of our cropland and conservation tillage on 100% of tillable acres, we could potentially reduce one quarter of the total U.S. agricultural emissions.” In addition to this eye-opening opportunity, these working lands provide a variety of free or low-cost ecosystem services that enhance resiliency and adaption, including stormwater management, groundwater recharge, and vegetation cover that cools cities — while simultaneously shortening the distance our food travels from farm to the consumer and contribute to our economy and food system.

STEERING COMMITTEE

Ellie Angerame
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Jim Smith
Cushman Farm

Keith Stechschulte
Farm Credit East

STAFF

Chelsea Gazillo - Director
cgazillo@farmland.org

Armando Paolino - Lobbyist

Climate-Smart Agriculture Recommendations

To build a zero-carbon future we must be prepared to take bold and innovative actions. The state has an immense opportunity to utilize our working lands as a tool to mitigate climate change. In 2018 The Nature Conservancy and 21 institutional partners conducted a peer-reviewed study that found investing in natural solutions to mitigating climate change could sequester up to 21% of the current net annual emissions. There is a wide array of agricultural and working land goals we could set and programs we could expand to help achieve this outcome. Therefore, we recommend the Governor's Council on Climate Change include the following working land programs and goals for consideration:

1. Expand upon successful conservation programs including CT's farmland preservation and open space conservation programs. Commit to full funding for the Community Investment Act. These programs help protect the working lands economy and support better land use planning.
2. Leverage state-level innovations that offer reductions on crop insurance premiums for cover crop adoption. Significant research data has shown the use of cover crops to increase carbon sequestration in soil.
3. Incentivize farmers to participate in the Regional Greenhouse Gas Initiative – an initiative of the New England and Mid-Atlantic states in the U.S. thus creating an economic opportunity for farmers and benefits for our environment.
4. Support additional research on practices that help address climate change and quantify their impacts to inform farmers and ensure sound public investments.
5. Restore funding for the state's Farmland Restoration Program, which helps protect our prime and important soils and aids in farm adaption and production.



6. Find new ways to fund climate-smart practices and reward farmers for reducing greenhouse gases.
7. Provide incentives for farmers to reduce and utilize organic wastes from the municipal waste stream.
8. Utilize smart solar siting strategies to prioritize solar development on preferred sites (brownfields, roof-tops, landfills), avoid conversion of our productive farmland and core forests, and incentivize dual-use (co-location) solar on farmland as an opportunity for increased farm viability.
9. Increase the use of Connecticut grown farm and forest products which shortens the distance our food travels from farm and supports the economy and food system.
10. Support a statewide healthy soil program that encourages climate-smart and soil health building practices across our working lands.

STEERING COMMITTEE

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New CT Farmer Alliance

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Weantinoge Heritage Land Trust

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Armando Paolino - Lobbyist

Connecticut is fortunate to have a small but innovative agricultural community that works in “fierce cooperation” to configure programs and policies which will benefit all farmers, our environment, and our economy.

We sincerely encourage the Governor's Council on Climate Change to prioritize the voices of our farmers, forest landowners, and conservation community when shaping policy and programming solutions that utilize the capacity of our working lands, which we have worked tirelessly to protect over the last 30 years, to be a part of the climate solution.

Thank you, again, for giving us the opportunity to submit comments on Governor Ned Lamont's Executive Order Number 3. We look forward to working with the Department of Energy and Environmental Protection and the Governor Ned Lamont administration in advancing climate adaptation strategies in the upcoming months.

With sincere regards,

Chelsea Gazillo
Working Lands Alliance Director
American Farmland Trust

From: [Loretta Wrobel](#)
To: [DEEP ClimateChange](#)
Subject: Executive Order 3
Date: Sunday, November 10, 2019 8:58:31 PM

Dear Governor Lamont,
Executive Order 3 does not address the need to stop and ban construction of all fossil fuel infrastructure (namely methane gas plants like Killingly and Bridgeport. A date of 2040 is much too late to phase out climate damaging emissions. It needs to be done immediately. Thank you for your attention to this extremely important issue that will impact all of us.
Loretta Wrobel
Ashford, CT 06278
860 429-2629

From: [Catherine Young](#)
To: [DEEP ClimateChange](#)
Subject: Public Comment: Executive Order No. 3
Date: Friday, November 08, 2019 3:01:59 PM

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3 to strengthen Connecticut's commitment to a decarbonized electric grid and support our state's efforts to combat climate change. I am hopeful that the Lamont administration is setting much-needed strong goals to address the climate crisis.

I would like to stress a few points:

1. There should be no further investment in fossil fuels in our state.
2. Please support community choice aggregation. We need to join Massachusetts and many of our New England counterparts on this front. Making clean energy more affordable is the first step to normalizing decarbonization.
3. Please support carbon sequestration in our old and new forests as well as using building as carbon sinks. <https://passivehouseaccelerator.com/articles/carbon-drawdown-now-jacob-racusin-speaks-in-ph-rocky-mountains-video>
4. Please support passive house certification for all new municipal buildings (Enerphit for existing)- these buildings should be 100 year buildings and should consume very little energy. Economic

Sincerely,

Catherine S. Young
*AIA | LEED Green Assoc. | Passive House Consultant (CPHC®)
CT Passive House member*

PENNIMAN ARCHITECTS

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From: [Alison Zyla](#)
To: [DEEP ClimateChange](#)
Subject: Protect our open spaces.
Date: Wednesday, October 30, 2019 6:14:33 PM

Forests are critical for our environment. We need to stop diverting funds from conservation programs and start investing in open space.