STATE OF CONNECTICUT

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VIA ELECTRONIC MAIL

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Re: Connecticut Climate Action Plan (CAP)

The Council on Environmental Quality (Council) provides the following comments regarding the development of the Connecticut CAP by the Department of Energy and Environmental Protection's (DEEP).

The Council supports efforts to reduce greenhouse gas (GHG) emissions in Connecticut. As noted in the Notice of Climate Action Planning Scope, Measures, and October 8 Meeting Breakout Session Preparation, dated October 1, 2025, if Connecticut were to continue to reduce its GHG emissions at the current average pace, the state could achieve a 40 percent reduction in GHG emissions below 2001 levels by 2030. While the projected reduction in GHG emissions is good, it would be short of Connecticut's goal to reduce GHG emissions by 45 percent below 2001 levels by 2030. To meet the 45 percent goal, the state would need to reduce its emissions by an additional 2 million metric tons of carbon dioxide equivalent (MMTCO2e) emissions by 2030.

The Council encourages DEEP to primarily focus on the sectors that contribute the most GHG emissions to the statewide inventory, which according to the most recent inventory report[1] for the period 1990-2023, includes the transportation sector (41.7 percent), the residential sector (19.2 percent), and the commercial sector (12.2 percent). And even though the most recent GHG inventory indicates that electric power sector contributed 10.3 percent of all GHG emissions in 2023 using the electric consumption model, the contribution of GHG emissions in the electric power sector using the electric generation model was more significant (30.3 percent).

Transportation
The Council notes that the October 8 meeting materials and associated DEEP CAP Survey identify "expand vehicle electrification, EV infrastructure, and zero and low-carbon fuels in on-road vehicles" as viable strategy or "measure" to reduce GHG emissions in the transportation sector. The Council supports this "measure"; however, the "actions" identified only address vehicle electrification and do not address "zero and low-carbon fuels in on-road vehicles". The Council suggests that the CAP assess the potential GHG emission reductions associated with the use of zero and low-carbon fuels for on-road vehicles including, but not limited to, hydrogen and biofuels, and prescribe specific "actions" to achieve those potential GHG emissions reductions. The Council also supports the "measure" to reduce vehicle miles traveled, especially for vehicles that consume fossil fuels. The Council suggests the inclusion of an "action" to encourage remote work as a way of reducing traffic congestion and vehicle miles traveled.

Residential and Commercial Buildings
The October 8 meeting materials include a "measure" to "increase energy efficiency in existing residential and commercial buildings", which the Council strongly supports. While the materials include "expand energy efficiency programs under the C&LM program"[2] as an "action", albeit

in support of the "expand grid-scale clean energy resources" measure, the Council suggests that the CAP include an "action" to promote passive design strategies including, but not limited to, strategic building orientation, natural daylighting and ventilation, and the use of advanced thermal insulation.

Electric Power
The October 8 meeting materials include a "measure" to "deploy distributed clean energy resources", which the Council strongly supports when installed on appropriate sites. The "actions" listed to support this measure include expanding rooftop solar for new and existing homes, new and existing commercial buildings, warehouse spaces, and expanding solar canopies. However, the associated DEEP CAP Survey includes "credits and incentives for the installation of solar panels on agricultural lands, also known as agrivoltaics" and "expand agrivoltaics" as possible choices for the electric power sector. This is potentially in conflict to the "actions" identified in the "measure" to "reduce emissions associated with soil runoff", which calls for 1) promoting agricultural land preservation and improving management of grasslands and pasturelands, and 2) supporting local food production, urban agriculture, and farm-to-school initiatives.

Natural and Working Lands, Carbon Sinks.
The October 8 meeting materials include a "measure" to "increase protection and conservation of high-carbon coastal habitats, wetlands, grasslands, and forests", which the Council strongly supports. An "action" listed to support this measure calls for the protection of 50 percent of core forests greater than 250 acres by 2040. As stated in the Council's 2024 annual report *Environmental Quality in Connecticut*, "core forests provide habitat for many species of wildlife (edge-intolerant species), provide connectivity and corridors for species migration, and increased opportunity to maintain overall biodiversity." Further, the 2024 annual report notes over 12 percent of all core forest acreage has been lost over the last 35 years. The Council suggests that the "action" should be the protection of all core forest in Connecticut.

Thank you for your consideration of the Council's comments.

Sincerely,

Paul Aresta
Executive Director

[1] 1990-2023 Connecticut Greenhouse Gas Emissions Inventory - Updated September 2025.
[2] Conservation and Load Management Program