



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

May 28, 2026

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Draft Nature-Based Solutions (NBS) Initiative Program Evaluation

The Council on Environmental Quality (Council) strongly supports the provisions of [Public Act \(PA\) 25-125, Section 12](#) that require the Department of Energy and Environmental Protection (DEEP) to evaluate “how to integrate and advance nature-based solutions in the state that support climate change mitigation, climate change adaptation, ecosystem resilience and biodiversity through:

- (1) the microgrid and resilience grant and loan pilot program authorized pursuant to [section 16-243y of the general statutes](#);
- (2) the open space and watershed land acquisition program authorized pursuant to [sections 7-131d to 7-131k, inclusive, of the general statutes](#), as amended by this act; and
- (3) other applicable state and federal programs administered by the Department of Energy and Environmental Protection that advance nature-based solutions.”

The Council offers the following comments regarding DEEP’s Draft NBS Initiative Program Evaluation.

- The Council supports the organization of the Draft NBS Evaluation, including the use of icons to represent the ten (10) NBS best practices identified in Section 12b of PA 25-125; the use of four (4) categories as “primary purpose”, “co-benefit”, “eligible”, or “not applicable” (N/A); and the associated color coding.

III. Evaluation of DEEP’s NBS Programs

- **Clean Water Fund Grants*** - the description for this program notes that grants and low-interest loans can be used to support investments in wastewater infrastructure, including “climate resilience projects” to improve water quality and enhance “infrastructure resilience, with a focus on combined sewer overflows (CSOs) and green infrastructure.” While it is understandable why “restore habitats and improve biodiversity” is identified as a “co-benefit”, the Council questions if NBS best practice #7 should also be identified as a “co-benefit” rather than just “eligible”.
- **Coastal and Estuarine Land Conservation Program** – according to the program description on the [National Oceanic and Atmospheric Administration Office for Coastal Management website](#), this program is authorized “to protect coastal lands that are ecologically important or possess other coastal conservation values, such as historic features, scenic views, or recreational opportunities.”¹ Given the identification of “recreational opportunities” in the program description, the Council suggests that NBS best practice #10 be identified as a “co-benefit” of this program and NBS best practice #1 be identified as “eligible”.

¹ [National Oceanic and Atmospheric Administration](https://coast.noaa.gov/czm/landconservation/), <https://coast.noaa.gov/czm/landconservation/>

- **DEEP Climate Resilience Fund (DCRF)** – this program is authorized pursuant to Connecticut General Statutes (CGS) Section 16-243y to support projects that protect communities and critical infrastructure from extreme weather. While the program description notes that “new funding categories” will support a wide range of community and energy resilience projects, it may not be clear to the reader if evaluation of this program addresses item (1) of Public Act 25-125, Section 12 that specifically identifies “the microgrid and resilience grant and loan pilot program.”
- **Forest Landowner Assistance** - the description of this program states that “Better forest stewardship means that more communities benefit from healthy forests as they enhance our quality of life with ecosystem services such as clean air and water, wildlife habitat, biodiversity, climate benefits, foraging and game harvesting opportunities, recreational opportunities, and renewable forest products.” Given the identification of “game harvesting opportunities” and “recreational opportunities” in the program description, the Council suggests that NBS best practice #10 be identified as a “co-benefit” of this program.
- **Highlands Conservation Act** - the description of this program states that the United States Fish and Wildlife Service (USFWS) provides funds to acquire land “with a focus on protecting lands critical for drinking water, recreational, and cultural resources.” The [USFWS program website](#) notes that the USFWS administers the program to assist its partners to “conserve an array of plants, fish, wildlife and their habitats” and to “protect open spaces for the benefit of both people and wildlife.” Given the identification of “plants, fish, wildlife and their habitats” in the program description, the Council suggests that NBS best practice #5 be identified as a “primary purpose” or “co-benefit” of this program.
- **Open Space and Watershed Land Acquisition Grants*** – the Council notes that CGS Section 7-131d states that funds administered through this program should be used for the purchase of land or permanent interests in land identified as being “especially valuable for recreation, forestry, fishing, conservation of wildlife or natural resources”, and land that “protects habitat for native plant or animal species listed as threatened or endangered or of special concern.” Given the provisions of CGS Section 7-131d, the Council suggests that NBS best practice #5 be identified as a “co-benefit” of this program.
- **Recreational and Natural Heritage Trust Program (RNHTP)** – the program description notes that the RNHTP is DEEP’s primary program for acquiring lands and waters to be added to the State’s system of public Parks, Forests, Wildlife Management, recreational water access, and other natural open.” The Draft NBS Evaluation also states that “DEEP acquired 642.9 acres of important wildlife habitat and wetlands in Killingly to establish a new Wildlife Management Area (WMA)” and the [Connecticut Open Space 2025 Annual Report](#) notes that the state’s share for the acquisition of the 642.9-acre “Tri-Lakes” property was acquired through the RNHTP. Given the use of funds to establish a new WMA, the Council suggests that NBS best practice #5 be identified as a “primary purpose” or “co-benefit” of this program.
- **Urban and Community Forestry Planning*** - the [United States Department of Agriculture, Forest Service webpage](#) for the Urban and Community Forest Program states that it is the only Federal program dedicated to “growing and maintaining urban and community trees, forests, and green spaces” and “improving the conditions of forests in urban communities.” Given the focus on growing and maintaining forests in urban communities, the Council suggests that NBS best practice #4 be identified as a “primary purpose” or “co-benefit” of this program. The Council also questions if NBS best practice #4 should be identified as a “primary purpose” or “co-benefit” for Urban Forest Equity Grant/Trees for Communities program and Urban Forested Natural Areas and Riparian Corridor Restoration Grant program since those programs might have similar goals/functions.
- **Urban Green & Community Garden Grants*** – the description for this program states that “promotion of open space in an urban setting may include, but may not be limited to, the development of a community garden.” Since the NBS best practice for #3 (encourage soil health across all landscapes) can apply to “agricultural lands, forests, wetlands, **developed lands** *[emphasis added]* and recreational spaces”, the Council suggests that NBS #3 be identified as a “co-benefit” of this program.

The Council recently reviewed a news release titled “[*DEEP Announces Recipients of Long Island Sound Ecosystem Grant for Green Stormwater Infrastructure & Habitat Restoration*](#)”, dated May 6, 2026. The news release indicated that “a total of over \$7.8 million has been awarded to eighteen Connecticut municipalities and non-profits focused on improving water quality, enhancing ecosystem resilience, and improving fish passage.” The Council suggests that the Draft NBS Evaluation also evaluate how to integrate and advance NBS through the program described in the news release, if not already addressed.

The Council notes that there are many programs administered by DEEP² that could utilize NBS to address specific environmental problems. The Council recommends that DEEP expand the list of programs being evaluated to those that have NBS connections. The Council also recommends that DEEP consider and evaluate carbon storage as essential as carbon sequestration in the Draft NBS Evaluation.

V. Opportunities to Advance NBS Programs

The Council notes that PA 25-125 Section 12 states that DEEP shall evaluate how to integrate and advance nature-based solutions in the state that support climate change mitigation, climate change adaptation, ecosystem resilience, and biodiversity through ... other applicable state and federal programs administered by DEEP. The Draft NBS Evaluation states that “there is an opportunity to consider NBS across state agency operations” and includes certain “common functions” where such integration might occur, such as through permitting, financing, technical assistance, and agency practices. The Council suggests that the Draft NBS Evaluation identify specific practices that DEEP and other agencies could employ to better address “**how**” to integrate and advance NBS across state agency operations.

For example, one operation or activity of DEEP’s Office of Energy Supply and Infrastructure is to work to “accelerate the deployment of equitable and innovative clean energy supply solutions.” To that end, DEEP has actively administered procurements and/or requests for proposals for zero carbon electric power from nuclear, hydropower, solar, onshore wind and associated transmission, and/or paired and co-located energy storage systems. While the Council supports the development of clean renewable energy on appropriate sites, the Council has observed that some land-based solar projects have resulted in the conversion of some important farmland and/or the alteration of some forested areas to energy production facilities. The Council suggests that NBS should be considered when developing policies and programs for clean energy development including, but not limited to, evaluating proposals that increase carbon sequestration through increased forest acreage, including reforestation; protecting carbon stocks through avoiding the conversion of forests and wetlands to other purposes; and increasing climate-smart agriculture and soil conservation to reduce greenhouse gas emissions while improving habitat and protecting biodiversity.

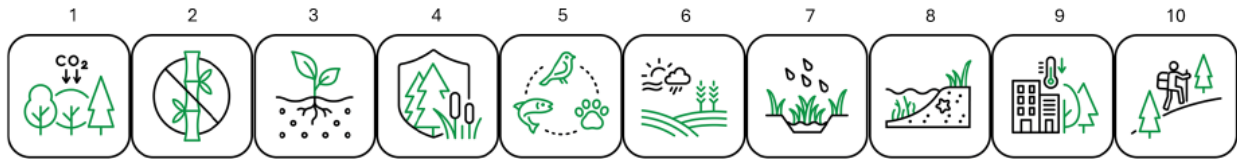
Thank you for your consideration of the Council’s comments.

Sincerely,



Paul Aresta
Executive Director

² CT DEEP, [Programs and Services](https://portal.ct.gov/deep/about/programs-and-services); <https://portal.ct.gov/deep/about/programs-and-services>.



1. Increase carbon sequestration through increased forest acreage, including reforestation.
2. Control invasive species.
3. Encourage soil health across all landscapes.
4. Protect carbon stocks through avoiding the conversion of forests and wetlands to other purposes.
5. Restore habitats to improve biodiversity.
6. Increase climate-smart agriculture and soil conservation to reduce greenhouse gas emissions while improving habitat and protecting biodiversity.
7. Increase community resilience by improving water quality and addressing flooding and drought through nature-based stormwater management.
8. Increase community resilience by improving water quality and addressing flooding and drought through shoreline protection that uses nature-based approaches such as living shorelines.
9. Improve air quality and reduce urban heat island effects through urban forestry and increasing green spaces.
10. Increase access to open space for public health benefits.

Primary Purpose BLUE means this NBS practice is a TOP PRIORITY for a Program	Co-Benefit GREEN means this NBS practice is a ADDITIONAL BENEFIT for a Program	Eligible ORANGE means this NBS practice is ELIGIBLE but <u>not</u> a top priority for a Program	Not Applicable GREY means the NBS practice is NOT APPLICABLE to a Program