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## CT Climate Progress Report Comments

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**From** Lynne Bonnett [REDACTED]  
**Date** Tue 1/27/2026 6:17 AM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

The New Haven Engineering Dept presented their analysis of New Haven's Greenhouse Gas Inventory to the public at one of the Environmental Advisory Council meetings (I think in 2023).

Notably, emissions from Tweed New Haven Airport's flights (transportation) were lacking since they were considered Scope III. Also GNG emissions from sludge incineration were not factored in. It seemed that industrial regional activities in New Haven were not factored in. At best, trucking related to industrial activities only accounted for vehicle miles travelled from the city's borders.

I did express my concern to DEEP's Air Bureau at one of their presentations to CEEJAC (CT Equity and Environmental Justice Advisory Council) last year that the GHG inventory for New Haven lacked full consideration of its regional activities (such as sludge incineration and airport emissions). They did agree with me that it was of concern to them also.

I would like to see a more accurate accounting of GHG emissions in the report. .  
Scope III activities significantly affect overall GHG emissions and we deserve to know how much they contribute to global warming, especially the marked expansion of Tweed New Haven Airport Authority and sewage sludge incineration.

Sincerely,  
Lynne Bonnett  
New Haven CT

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*Lynne Bonnett*

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## Public Comment on Connecticut's Climate Progress Report

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From Dana [REDACTED]  
Date Tue 1/27/2026 9:48 AM  
To DEEP ClimateChange <DEEP.ClimateChange@ct.gov>  
Cc [REDACTED]

 2 attachments (1 MB)

Role of wetlands in carbon storage\_ncomms13835.pdf; GC3\_WNL\_Wetlands\_Final\_Report\_111320.pdf;

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear DEEP - in regards to your "Connecticut's Climate Progress Report: submitted recently for public comment. I am both appreciative and highly disappointed in the draft document. My main disappointment is the total apparent lack of regard for one of Connecticut's most valuable resources towards combating climate change: our wetlands. It is imperative that we not only ensure preservation of all wetland acreage currently in place, but that we also restore considerable areas of wetlands destroyed or filled in (commonly illegally) in the past 5+ decades. This also includes restoring native marsh grasses. Our wetlands are one, if not the most unique key to carbon capture. Hence, this comment especially refers to Pg. 32: "The Role of Sequestration in Reaching Net-Zero". Please add and detail the value of, and need to preserve -and restore as much as feasible (especially on government/public owned properties) our wetlands to this section.

Below and attached are multiple references referring to the tremendous value of wetlands for carbon capture. Notably, there is a plethora of literature on this, so this is just a micro-sampling of such literature.

From NOAA:

<https://oceanservice.noaa.gov/ecosystems/coastal-blue-carbon/#:~:text=In%20summary%2C%20coastal%20wetlands%20are,of%20time%20in%20their%20soils.>

NOAA: <https://oceanservice.noaa.gov/ecosystems/coastal-blue-carbon/#:~:text=In%20summary%2C%20coastal%20wetlands%20are,of%20time%20in%20their%20soils.>

National Geographic: <https://blog.education.nationalgeographic.org/2018/01/11/another-reason-to-love-wetlands-blue-carbon/>

World Economic Forum: <https://www.weforum.org/stories/2023/12/wetlands-carbon-sink-climate-change-mitigation/>

Environmental Research Journal:

<https://www.sciencedirect.com/science/article/abs/pii/S0013935125001410>

NASA Science.gov: <https://science.nasa.gov/earth/nasa-researchers-study-coastal-wetlands-champions-of-carbon-capture/>

Other references (including specific to CT):

<https://planetforward.org/story/connecticut-saltwater-marshes/#:~:text=Related%20Topics;slow%20atmospheric%20carbon%20dioxide%20accumulation.>

## CT Climate Progress Report Comments

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**From** Kristin Foster [REDACTED]  
**Date** Tue 1/27/2026 11:52 AM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

With regards to Public Act 25-125,

Please keep up the good work you are doing to mitigate climate change and build climate resilience for the State of CT.

Please encourage and allow more solar rooftop installations, especially on public school buildings and municipal offices. Schools often do not have environmentally responsible budgets and need incentives to actualize more environmentally oriented practices. Schools need to be shown it is in their monetary interest to include more green policies and programs. For example, this is especially true for in school waste; be it paper, cardboard or food.

I am proud of the leading work CT is doing, but we must do more than our share as some states are not as financially able to do so as we are.

Sincerely,  
Kristin N Foster

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## CT Climate Progress Report Comments

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**From** Carolyn Lyle [REDACTED]  
**Date** Tue 1/27/2026 12:17 PM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear DEEP,

I live in Old Saybrook where the Connecticut River meets Long Island Sound. Old Saybrook is a nationally recognized estuary and we are subject to the tides of the Connecticut River and Long Island Sound . This geographic location makes our community vulnerable to the increasing climate change environmental impacts like sea level rise, flooding, and ground water and coastal pollution. I live directly on the LIS coast and saw hurricane Sandy take 1/2 of my front yard, I have watched the mean high tide increase each year since 1970. I am a witness to the threatening impacts of climate change.

As a witness to the threats of climate change I am compelled to learn all I can and to become an active member in several local community groups focusing on climate change impact of sea level rise and the corresponding need to preserve our urban forests.

I am glad that our Connecticut legislators and our Governor are now taking the threat of climate change seriously.

The Global Warming Solutions Act and the Governor's Council on Climate Change, participation in the Regional Greenhouse Gas Initiative and the New England Governors and Eastern Canadian Premiers are positive steps to impact climate change threats.

But time is running out. The statutory and collaborative efforts take time but preserving trees, replacing mature trees and aggressively planting trees can happen **NOW**. Trees are the #1 carbon sequesters. One mature tree can absorb 22 to 48 pounds of carbon in one year . Forests multiply this benefit by thousands, removing tons of carbon from the atmosphere, mitigating global warming.

Pertaining to the Climate Progress Report please consider the following:

### **1. *Natural and Working Lands***

- a. 'avoid' land conversion of our forests and improving the management of forests..

comment: instead of ' avoid ' please consider reviewing state and local zoning land use regulations that **prohibit** such conversion. Include requirements for notices, permits for clear cutting trees, penalties for violations.

b. " connecting private landowners with expanding management resources and opportunities"

comment: Yes private landowners and local municipal land use commissions need to understand the value of trees and

urban forests to carbon sequestration , the WIFM as well as and the ability of CT to reach it's emission goals.

c. " the broader goals for NWL"

comment: These goals are good- please expand upon these and name best practices, a working group

and a timeline for implementation on a smaller model scale.

There are **additional opportunities** for the state to preserve trees:

1. **Public Act N. 25-33** *An Act Concerning the Environment , Climate and Sustainable Municipal and State Planning*

a. *Review the section " Coastal Site Plan Review Exemptions"* which exempts minor modifications and constructions

which often involve clearing of trees. Include climate change impact and required mitigation.

b. *Review the section " Municipal.. Hazard Mitigation Plans "*

Ensure that the requirement to consider climate change in planning is met and put in place a review and approval process for an adequate municipal plan.

c. *Review the section " Geospatial Data Submission Requirements"*

Ensure that municipalities submit sufficient and useful data and determine how they will be ready to submit this data on a timely basis.

d. *Review the section " Conservation and Development Plan Requirements"*

Ensure that municipalities comply and define an accountable process to get solid/ useful/ smart and actionable plans with timelines.

2. **Riparian Buffer Working Group-** formed in June 2025 with a report due winter 2026.

a. Review this group's recommendations and amend the CT Inlands Wetlands and Watercourses Act from 1972, update the upland review process to meet the needs of the next 30-50 years based on climate change impact prediction and geospatial data.

b. Note that the 100 feet upland review area is too small and does not protect vegetation and carbon absorbing trees from removal; strengthen the law's permitting requirements and join the other New England states to have explicit statutory protections for riparian buffers. These other states have expanded their upland review area.

In summary, progress on climate in our state has the elements of clear-eyed recognition of our collective

threat of climate change as well as outdated processes that will curtail if not dangerously stall those good solutions. We need good data, updated zoning and IWW upland reviews regulations and state leadership to protect, preserve and supply the # 1 defense against carbon emissions-trees. Trees can be preserved now... let's honor and respect this natural resource.

Thank you for your time and attention.

Carolyn N. Lyle

Member- CT Advocate for Trees

Member- various community groups regarding climate change and municipal tree canopies.

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## CT Climate Report Comments

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**From** [REDACTED]  
**Date** Tue 1/27/2026 12:40 PM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Commissioner and Staff of the Connecticut DEEP,

In support of Connecticut's climate mitigation and resilience goals per the State's Climate Action Plan (CAP) and Global Warming Solutions Act, I urge DEEP to prioritize preservation of intact state forests as a core climate strategy, including allowing selected forests to mature toward late-successional and old-growth conditions, consistent with DEEP's emphasis on natural and working lands as nature-based climate solutions.

### 1. Preserved state forests align directly with DEEP's Climate Action Plan priorities

The CAP identifies forests as critical carbon sinks and emphasizes the importance of avoiding emissions, enhancing sequestration, and increasing ecosystem resilience. In this context, preservation of intact forests represents one of the most reliable and immediately effective climate actions available to the State.

Forest thinning and logging increase net carbon emissions in the near term through removal of biomass, soil disturbance, and decomposition of residual material. These emissions occur during the very decades when Connecticut must achieve its most significant reductions. The IPCC has made clear that protecting existing carbon stocks is essential for meeting near-term climate targets, particularly where time is limited (IPCC AR6, WGIII, 2022).

### 2. Clarifying the climate role of Connecticut's forest products sector

Connecticut's forest products industry is modest in scale and primarily oriented toward low-value or short-lived products, including firewood, mulch, paper, and biomass fuel. While the industry plays a role in local economies, it does not function as a major long-term carbon storage system.

Most harvested carbon:

- Returns to the atmosphere within years or decades
- Is accompanied by manufacturing and transport emissions
- Does not offset the immediate carbon losses associated with harvesting

Peer-reviewed research consistently finds that, in regions like southern New England, harvesting for wood products does not provide net climate benefits within policy-relevant timeframes (Hudiburg et al., 2019; Law et al., 2018).

### 3. Rebutting the claim that thinning improves climate outcomes

Proponents of thinning often argue that younger, faster-growing forests sequester more carbon as they focus narrowly on growth rates rather than total carbon storage, which is inconsistent with current science:

- Mature and older forests store substantially more total carbon than young forests

- Older forests continue to accumulate carbon over time
- Large, mature trees contribute disproportionately to carbon uptake

(Stephenson et al., Nature, 2014)

The U.S. Forest Service recognizes that older forests remain net carbon sinks, not stagnant systems (USFS Forest Carbon Accounting Framework, 2019).

#### 4. Soil carbon protection and ecosystem integrity

DEEP's CAP emphasizes resilience and ecosystem integrity as foundational climate strategies. Forest soils contain more carbon than aboveground vegetation combined, and disturbance accelerates decomposition and carbon loss that can take centuries to reverse.

Preserving intact forests protects:

- Long-term soil carbon stocks
- Cooler, more humid microclimates
- Watershed function and water quality

These attributes directly support the CAP's adaptation, public health, and resilience objectives.

#### 5. Advancing a strategic vision: allowing forests to mature to late-successional and old-growth conditions

Connecticut currently has very little true old-growth forest, yet the CAP emphasizes long-term carbon storage, resilience, and co-benefits. Allowing selected state forests to progress toward late-successional and old-growth conditions would:

- Maximize long-term carbon storage
- Provide the most stable and disturbance-resistant forest systems
- Serve as climate benchmarks and reference ecosystems
- Deliver enduring public benefits aligned with intergenerational equity

This approach does not preclude active management elsewhere, but it recognizes that preservation is itself a valid, science-based form of forest management when climate mitigation is the primary objective.

#### Conclusion

Consistent with Connecticut's Climate Action Plan, Global Warming Solutions Act, and best available science, preserving intact state forests represents one of the most effective and immediately deployable climate strategies available to the State. Forest protection avoids new emissions, safeguards irreplaceable carbon stocks, and advances resilience and public benefits simultaneously.

I respectfully encourage DEEP to treat preserved state forests as critical climate infrastructure and to purposefully support the maturation of selected forests—including those in and around coastal communities such as Old Saybrook—toward late-successional and old-growth conditions as part of Connecticut's long-term climate solution set.

Thank you for the opportunity to comment and for your leadership on climate action.

Sincerely,  
Lea Sloan

*Lea Sloan*  
*Forests Advocate*  
*Old-Growth Forest Network Board*  
*Sierra Club Forests & Climate team*  
*Climate-Forests Coalition*



## References for the Administrative Record

- IPCC. 2022. Sixth Assessment Report, Working Groups II & III
- Stephenson, N.L. et al. 2014. Nature
- U.S. Forest Service. 2019. Forest Carbon Accounting Framework
- Hudiburg, T.W. et al. 2019. Environmental Research Letters
- Law, B.E. et al. 2018. PNAS

Department of Energy and Environmental Protection  
RE: Draft Report on Connecticut’s Climate Progress – Public Comment  
January 27, 2026

The purpose of my comments is to:

1. encourage the Department of Energy and Environmental Protection (DEEP) to more fully and honestly address the legislature’s request for information on “the status of GHG emission reduction efforts in other states ...”; and
2. encourage DEEP to address 1.5 million tons of greenhouse gas emissions from lawn care equipment (2025 – 2030) with ready-made solutions to reduce climate pollution and improve air quality

**1. The Draft report fails to identify the States which are leading on Climate Change Progress and to specify why those States are being successful.**

The legislature requested DEEP to provide “(d)(3) the status of greenhouse gas emission reduction efforts in other states ... Arguably, the legislators are interested in this information to understand whether CT is leading or lagging in comparison to other States, and to identify actions that CT may wish to adopt to further its progress.

There are numerous, readily available, and objective organizations which rank States by Climate Change Actions. This draft DEEP report, however, fails to identify the States leading on these actions. For example, the CT Inventory provides that transportation is the leading contributor to greenhouse gas emissions. CT main strategy to address these emissions is to electrify the transportation sector. The American Council for Energy Efficiency Economy (ACEEE) prepared a 2023 report ranking the States on the electrification of Transportation.<sup>1</sup> Connecticut is ranked 12<sup>th</sup>. Neighboring States NY and Massachusetts are ranked 2<sup>nd</sup> and 4<sup>th</sup>. This begs the question, “what is NY and Mass doing that CT should be doing to further reduce GHG emissions from transportation? This report does not answer that question and therefore provides limited value to the public and its representatives.

A partial imprint of the ACEEE report’s Appendix A – Full State Scores follows.

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<sup>1</sup> <https://www.aceee.org/sites/default/files/pdfs/T2301.pdf>

## Appendix A. Full State Scores

Table A1. Full scores by scoring category for all 50 states and the District of Columbia

State	Planning and goals (15 pts.)	Incentives (36 pts.)	Transportation system efficiency (17 pts.)	Electricity grid optimization (9 pts.)	Outcomes (23 pts.)	Total (100 pts.)
California	15	30.5	14.5	10	18	88
New York	12	25	7	9	9	62
Colorado	11	17	9.5	9	14.5	61
Massachusetts	10	21.5	8.5	6	11.5	57.5
Vermont	12	14	5.5	7	18.5	57
Washington	14.5	13	8	5.5	15	56
New Jersey	9.5	21.5	6	7	9.5	53.5
District of Columbia	6.5	16.5	9.5	6	13	51.5
Oregon	15	12	6	7	11.5	51.5
Maryland	5.5	14	9	7	13.5	49
Maine	5	16	4	7	11.5	43.5
Connecticut	6.5	17	8	5	6	42.5

The DEEP Draft Report ignores the conclusion that **Connecticut is a follower – NOT a leader on Climate Change**. Only when we are honest about our progress and are willing to adopt best practices from leading States, will we be able to jump off the “Business As Usual” trendline.

Category	CT Ranking
Renewable Energy Usage <sup>2</sup>	40th
Installed community solar capacity <sup>3</sup>	35th
Clean Energy Jobs <sup>4</sup>	27 <sup>th</sup>
EV adoption per capita <sup>5</sup>	15 <sup>th</sup>
Electrification of Transportation <sup>6</sup>	12 <sup>th</sup>
Energy efficiency <sup>7</sup>	9 <sup>th</sup> & trending down

<sup>2</sup> US News & World Report (EIA data) <https://www.usnews.com/news/best-states/rankings/infrastructure/energy>

<sup>3</sup> Sharing the Sun 2023 data

<sup>4</sup> <https://www.renewableenergyworld.com/solar/u-s-states-ranked-by-clean-energy-jobs-in-2022/>

<sup>5</sup> <https://oilprice.com/Energy/General/State-Rankings-Electric-Vehicles-per-Capita-in-the-United-States.html>

<sup>6</sup> ACEEE 2023 State Transportation Electrification Scorecard

<sup>7</sup> ACEEE State Energy Efficiency Scorecard: [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.aceee.org/sites/default/files/pdfs/State\\_Scorecard/2022/one-pagers/Connecticut.pdf](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.aceee.org/sites/default/files/pdfs/State_Scorecard/2022/one-pagers/Connecticut.pdf)

I encourage DEEP to address its statutory reporting obligations with the objective of providing the public and its representatives with actionable information. Even if our current State ranking on GHG emission reductions is embarrassing. Let’s face the truth and take appropriate action.

**2. The Draft report fails to identify 1.5 million tons of GHG emissions that can be readily addressed by existing technologies. My proposed solution is implementation-ready, will provide immediate reductions in greenhouse gases, and will primarily benefit low-income disadvantaged communities.**

**a) Greenhouse gas and toxic emissions from gas powered leaf blowers & other two-stroke lawn care equipment are significant**

US PIRG, and others, published a report titled [“Lawn Care goes Electric”](#) in October 2023. Table A-1 depicts the tons of emissions from this equipment for the State of Connecticut. These are annual emissions. Using the DEEP draft report format of a 5-year period, the GHG emissions exceed 1.5 million tons.

**Table A-1. Emissions from lawn and garden equipment by state, 2020**

State	Nitrogen oxides (tons)	Volatile organic compounds (tons)	Carbon dioxide (tons)	Methane (tons)	PM <sub>2.5</sub> primary (tons)	1,3-Butadiene (lbs.)	Benzene (lbs.)	Formaldehyde (lbs.)
Connecticut	872	4,144	337,890	254	284	41,604	235,033	74,690

**NOx, CO2 and Methane are the top 3 greenhouse gases targeted under the Kyoto Protocol.** Four of the listed compounds are carcinogens (PM2.5, 1,3-Butadiene, Benzene, Formaldehyde); and NOx and VOCs combine to form ground level ozone (lung issues).

According to the report authors, 85% of the PM2.5 and 51% of the VOC emissions are attributable to 2-stroke engines (i.e., gas-powered leaf blowers). "Engine type – Across all types of equipment, two-stroke engines were responsible for 85% of all fine particulate emissions from gasoline-powered equipment in the lawn and garden sector in 2020, along with 51% of all VOC emissions." (see page 14).

A [US EPA Region 1 study](#) measured the emissions for gasoline powered lawn and garden equipment (GLGE) including gas powered leaf blowers. The study found that; “GLGE is an important source of toxic and carcinogenic exhaust and fine particulate matter. Improved reporting and monitoring of localized GLGE emissions should be implemented. Medical and scientific organizations should increase public awareness of GLGE and GLME and identify GLGE as an important local source of dangerous air pollutants. Communities and environmental, public health, and other government agencies should create policies and

programs to protect the public from GLGE air pollutants and promote non-polluting alternatives.”

**b) Using a gas-powered leaf blower for 30 minutes is the pollution equivalent of driving a Ford Raptor 3,900 miles**

In 2011, [Edmunds](#) conducted an emission study and found that a typical two stroke leaf blower emits hundreds of times more hydrocarbons than the Ford A F-150 SVT Raptor Pickup truck that was used as a control. "The hydrocarbon emissions from a half-hour of yard work with the two-stroke leaf blower are about the same as a 3,900-mile drive from Texas to Alaska in a Raptor."

**Edmunds' InsideLine.com FTP 75 Emissions Test Results (in grams per minute)**

	<b>Non-Methane Hydrocarbons(NMHC)</b>	<b>Oxides of Nitrogen (NOx)</b>	<b>Carbon Monoxide (CO)</b>
<b>2011 Ford Raptor</b>	0.005	0.005	0.276
<b>2012 Fiat 500</b>	0.016	0.010	0.192
<b>Ryobi 4-stroke leaf blower</b>	0.182	0.031	3.714
<b>Echo 2-stroke leaf blower</b>	1.495	0.010	6.445

**c) The persons most exposed to the toxic emissions, noise, and vibrations are the low-income disadvantaged landscape employees**

It is becoming more widely recognized that the individuals most adversely affected by gas-powered leaf blowers are the landscape employees. These employees are typically minimum wage employees, who will use gas powered leaf blowers and string trimmers throughout their workday.

The people fighting to keep the status quo are **not** the ones most exposed to the hazards posed by these super polluting machines. Let’s give the workers a better tool for the job. Landscapers that have made the switch to battery operated equipment have been surprised that their employees have reacted positively to the change.

[Class, Race and Leaf Blowers \(Oct 2023\)](#)

[Landscape Workers Health is At Risk in Montgomery County \(April 2023\)](#)

**The State should consider doing the following:**

1. Leading by example and transition from fossil-fuel to battery operated equipment for smaller lawn care equipment<sup>8</sup>; and

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<sup>8</sup> It was quite disappointing to read DEEP’s comments in opposition to HB 6263. The bill would allow the State to use its existing equipment till end of useful life, permitted continued use of gas-powered equipment for a number

2. provide grants to CT cities and towns to conduct two-stroke lawn care equipment buy-back or rebate programs (gas powered leaf blowers, string trimmers and hand-held mowers).
    - a. The buy-back program can be limited to municipalities interested in leading by example, or
    - b. the scope could be broadened to include residents and/or commercial operators
- d) **DEEP has experience conducting a successful buy-back program for lawn and garden equipment**

DEEP conducted a buyback of lawn and garden equipment in 2010 - 2012. Keep in mind, that this program allowed for the purchase of new gas-powered equipment. It was a change out of old for new -- but it still had measurable & positive environmental benefits. Imagine the environmental benefits of a buy-back exchange of old gas powered equipment for battery operated equipment. See [Connecticut Lawn Equipment Exchange Fund \(LEEF\)](#).

In any event, the biggest bang for the buck was buying back old gas-powered leaf blower and string trimmers.

"The cost-effectiveness of exchanges within specific equipment categories varied similarly to that across all categories. Broad trends, however, suggested **that exchanges involving smaller pieces of equipment (e.g., leaf blowers and trimmers) outperformed larger machines (e.g., ride-on mowers) in terms of cost effectiveness**, while exchanges involving larger machines contributed more in terms of the absolute amount of emissions reduced. "

Attachment 9 shows that the top ten exchanges ranked by cost effectiveness per ton were primarily gas-powered leaf blowers and string trimmers.

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of exempted uses, and had a liberal transition date. At a minimum GreenerGovCT should begin to transition from fossil fuel lawn care to battery operated lawn care equipment.

Equip. category	RECALC	ULATED_2-25
	THC+NOx (tons)	Cost Effectiveness (\$/ton)
Leaf blower	1.122462179	\$ 181.74
Leaf blower	0.777089201	\$ 262.51
Leaf blower	0.777089201	\$ 262.51
Trimmer	0.800286435	\$ 269.85
Leaf blower	0.610415184	\$ 283.02
Leaf blower	0.925443216	\$ 381.18
Trimmer	0.491932831	\$ 414.67
Trimmer	0.491932831	\$ 414.67
Brushcutter	0.379344507	\$ 809.80
Leaf blower	0.197255342	\$ 892.85

**e) The Senior elected official of 8 CT towns have requested the re-activation of the LEEF program -- LEEF version 2.0**

The top elected officials from 8 Connecticut towns have recently written letters in support of a LEEF version 2.0 program.

LEEF Version 2.0 would:

- Be voluntary and limited to municipalities and school districts
- Exchange older gas-powered equipment for battery-operated alternatives, not new gas models
- Focus on the highest-impact items (e.g., leaf blowers, trimmers, push mowers, and charging stations)
- Support worker health, reduce municipal liability, and improve long-term budget

Below is a list of the towns and their Sustainable CT certification ranking.

Branford (Bronze),  
 Bridgeport (Silver),  
 Greenwich (Silver),  
 New Haven (Gold)  
 Norwalk (Gold),  
 New Haven (Gold)  
 Norwalk (Gold),  
 Stamford (Silver), and  
 West Hartford (Gold)

Copies of the 8 letters have been forwarded to DEEP and are available upon request.

Vincent Giordano, volunteer  
Sierra Club CT Chapter

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## CT Climate Progress Report Comments

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From Fran Brady [REDACTED]  
Date Tue 1/27/2026 5:12 PM  
To DEEP ClimateChange <DEEP.ClimateChange@ct.gov>  
Cc [REDACTED]

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear DEEP,

I have lived in Madison CT now for 16 years. I am originally from the City of Philadelphia where Street trees were the rarity let alone majestic, forested areas such as what we have here in CT.

I am the cofounder of a tree giving away organization called MAD for Trees. In four years, we have given away over 900 native trees to Madison residents absolutely free. Unfortunately, no matter how many trees we provide, we are dramatically falling behind the number that are being clear cut down just by the actions of our own State departments and Utilities. CT DOT and Electric companies have removed multiple thousands of trees in our town over this same time period.

I am glad that our Connecticut legislators and our Governor are now taking the threat of climate change seriously. The Global Warming Solutions Act and the Governor's Council on Climate Change, participation in the Regional Greenhouse Gas Initiative and the New England Governors and Eastern Canadian Premiers are positive steps to impact climate change threats.

But time is running out. The statutory and collaborative efforts take time but preserving trees, replacing mature trees, and aggressively planting trees needs to happen **NOW**. Trees are the #1 carbon sequesters. One mature tree can absorb 22 to 48 pounds of carbon in one year. Forests multiply this benefit by thousands, removing tons of carbon from the atmosphere, mitigating global warming.

Pertaining to the Climate Progress Report please consider the following:

1. **Natural and Working Lands**
  - a. "avoid" land conversion of our forests and improve the management of forests. My comment: Instead of "avoid" please consider reviewing state and local zoning land use regulations that **prohibit** such conversion. Include requirements for notices, permits for clear cutting trees, penalties for violations and requirements to replace trees.
  - b. "connecting private landowners with expanding management resources and opportunities". My comment: Yes, private landowners and local municipal land use commissions need to understand the value of trees and urban forests to carbon sequestration, the WIFM as well as the ability of CT to reach its emission goals.
  - c. "the broader goals for NWL" – My comment: These goals are good but please expand upon these and name best practices, a working group, and a timeline for implementation on a smaller model scale.

There are **additional opportunities** for the state to preserve trees:

2. **Public Act N. 25-33** *An Act Concerning the Environment, Climate and Sustainable Municipal and State Planning*

- a. *Review the section " Coastal Site Plan Review Exemptions" which exempts minor modifications and constructions which often involve clearing of trees. Include climate change impact and required mitigation.*
- b. *Review the section " Municipal Hazard Mitigation Plans " - ensure that the requirement to consider climate change in planning is met and put in place a review and approval process for an adequate municipal plan.*
- c. *Review the section " Geospatial Data Submission Requirements"- ensure that municipalities submit sufficient and useful data and determine how they will be ready to submit this data on a timely basis.*
- d. *Review the section " Conservation and Development Plan Requirements" - Ensure that municipalities comply and define an accountable process to get solid / useful / smart and actionable plans involving the protection and replacement of trees.*

3. **Riparian Buffer Working Group-** formed in June 2025 with a report due winter 2026.

- a. Review this group's recommendations and amend the CT Inlands Wetlands and Watercourses Act from 1972, update the upland review process to meet the needs of the next 30-50 years based on climate change impact prediction and geospatial data.
- b. Note that the 100 feet upland review area is too small and does not protect vegetation and carbon absorbing trees from removal; strengthen the law's permitting requirements and join the other New England states to have explicit statutory protections for riparian buffers. These other states have expanded their upland review area.

4. **Clear Cutting by CTDOT and Electric Utilities** - Consider the requirement of replacing trees cut down by our state agencies such as CTDOT and utilities like Eversource.

In summary, progress on climate in our state has the elements of clear-eyed recognition of our collective threat of climate change as well as outdated processes that will curtail if not dangerously stall those good solutions. We need good data, updated zoning and IWW upland reviews regulations and state leadership to protect, preserve and supply the # 1 defense against carbon emissions - trees. Let's honor and respect this natural resource.

Thank you for your involvement and concern for the health of our state's environment and the future for our children.

Yours truly

Francis X. Brady

Town of Madison Tree Advisory Committee member

Cofounder of MAD for Trees

Connecticut Advocates for Trees - member



Connecticut  
Advocates for  
Trees

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## Climate Change Progress Report Comments

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**From** Diane Hoffman [REDACTED]  
**Date** Mon 2/2/2026 9:26 AM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

 6 attachments (13 MB)

HAT Sept 4th 2025 letter to DEEP re education and relicensing.pdf; HAT letter to DEEP from CT residents re Tree Wardens.pdf; IMG\_2642 (1).jpeg; IMG\_2643 (1).jpeg; IMG\_2644 (1).jpeg; IMG\_2645 (1).jpeg;

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

2/2/26

To: DEEP

Hamden Alliance for Trees has been following Connecticut's climate action planning for several years. We are a grassroots organization dedicated to the care and growth of our urban forest.

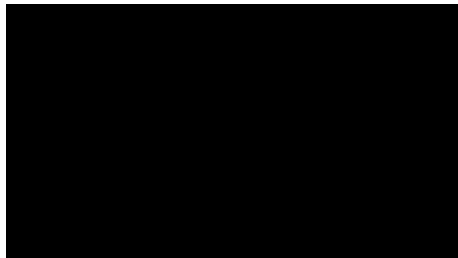
We have the following primarily nature-based recommendations which we believe will have a significant positive impact on our environment if supported by DEEP.

1. There is an urgent need for DEEP to require continuing education classes and periodic recertification for our Connecticut tree wardens. As the position most empowered and responsible for overseeing Connecticut's public trees, it is essential that tree wardens become more professional if we are serious about protecting and growing our state urban forest. (see attached letters signed by CT residents)
2. We call for DEEP to oppose the installation of solar facilities in our forests and not provide permits for these facilities. Forests are not the appropriate or best place for solar facilities to be sited. Solar and trees are both essential to the health and resilience of our state and each has rightful places to exist. Putting solar in a forest is the most expensive and damaging long-term decision.
3. We urge DEEP to take a strong stand on protecting the riparian buffer along our water courses as well as the vegetation upland. This is essential to reduce serious flooding, and to keep our water clean and within healthy temperatures.
4. We support the excellent recommendations submitted by Carolyn Lyle of Old Saybrook regarding our rising seacoast waters.
- 5 We join the call for DEEP to stop permitting fossil fuel projects including pipelines, compressor stations and power plants, immediately. Until that is stopped there can be no serious progress in achieving our carbon reduction goals and DEEP is throwing good money after bad.
6. Lastly, we call on DEEP to engage in a serious educational campaign to help the public understand the critical need for environmental nature-based actions if we hope to create a safe, healthy, resilient state for our children to inherit.

Please acknowledge receipt of this letter and share your comments with us.

Thank you,

Diane Hoffman  
Ralph Jones  
Susan Neitlich  
Susan Etkind  
Melinda Tuhus  
Elizabeth Langhorne



Core Members of Hamden Alliance for Trees

## CT Climate Progress Report Comments

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**From** Ralph Jones [REDACTED]  
**Date** Mon 2/2/2026 7:10 PM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

First, thank you all for doing this. Your care and attention to detail matter.

Thank you for recognizing the importance of trees to climate care. They are our lowest cost allies. We need a statewide policy protecting them, especially in places like highway right of ways and riparian borders

Connecticut's greenhouse gas targets are urgent. We must make rapid progress on this despite federal backsliding. Perhaps even more so because of federal backsliding. I urge you to take any steps available to accelerate progress. Establishing educational standards for tree wardens and protecting forests from use by solar are two suggestions. Developing an accurate inventory of trees and land use in CT would also help.

I have lived in Connecticut most of my life. I'm glad we are taking our environment seriously.

Sincerely,

Ralph Jones  
Hamden



### **NVCOG Comments on CT DEEP's "Connecticut's Climate Progress Report"**

- P. 5: The “business as usual” projections should be contextualized with the statutory goals side-by-side. How far short are we falling if we only achieve 44% reduction by 2050?
- P. 7 – this section indicated CT natural disasters resulting from climate change, but does not put much emphasis on loss of human life and wildlife during these events.
- P. 8 + Appendix A: Consider listing not only list the climate-friendly bills that passed, but the many bills that died on the floor, never made it out of committee, or were gutted before passage. For an accurate progress report, it’s important to look at our strides forward as well as our setbacks.
- P. 14: “Emissions from the electric power sector are expected to significantly decrease in the near term as more clean energy is added in the state and the region.” Does this account for (1) the push for electrification (ie, electric heat in homes instead of oil), and (2) **the spike in electricity usage** associated with data centers?
- P. 14, Paragraph 1: Only refers to clean technologies as a way to meet the GHG emissions. This is vague. Clarify to include other approaches that are also not being adopted fast enough such as consumption reduction and energy efficiency.
- P. 22 – consider adding the termination of FEMA’s BRIC program which funded countless natural hazard mitigation projects. Many of which are produced by the effects of climate change.
- P. 22-23: The summary of Federal changes/impacts is great and very useful for regional governments to refer to.
- How do the “Continuing State and Federally Funded Programs” connect to the previous data about not reaching the climate change goals. What kind of investments/expediency would be required for these programs to catch up to meet the goals? Or are there program gaps that CT can work on implementing?
- P. 28: Under Current and Future Clean Energy Plans, for Heat Pumps, there is no discussion of DEEP’s CPRG-funded Heat Pump Accelerator program. It is mentioned on P. 31, but no detail is provided. This huge multimillion dollar effort should be discussed in greater detail and quantified.
- P. 31: Electric sector reductions seem really steep for demand-response. I looked at the methodology in the PCAP (P. 121-127) and the estimates demonstrate GHG Emissions Rate going from 132 lbs/MWh in 2025 to 2 lbs/MWh in 2039. I think we need to take another look at this.
- P. 32 & 33: It would be helpful to define Natural and Working Lands and reference the appendix. A graphic showing the range of sequestration by land type that

includes wetlands (likely what you're referencing in paragraph 2 of "The Role of Sequestration section") would be helpful.

- It would be great to include the level of protections of the lands used to calculate this data, and connection to policy. For example, the appendix mentions the State's open space protection goals but it would be helpful to see how this connects to the sequestration needs by including how much estimated MMTCO<sub>2e</sub> this is, because it seems the 4.9 MMTCO<sub>2e</sub> metric used on P. 32 from the GHG inventory are including unprotected areas as well as protected so it is not a reliable metric. Agree!
- P. 36: First sentence glosses over the environmental risks and consequences of CDR. I recommend at least one sentence explaining summarizing these concerns. Rephrase "few environmental co-benefits" Strongly agree.
- P. 37: When is the CIRCA report on updated climate projections anticipated to be complete?
- Add how the CT Insurance Department bought the FirstStreet tool for access to data about climate impacts on properties (**Fall 2025**) and link to the resource. **Free Climate Risk Mapping Tool**
- P. 40 – replace "last week" with the actual date of memorandum signature.
- P. 40 – 44: Add a section about Tribal Nation greenhouse gas emissions reduction initiatives. This can be informative for CT goals, as the tribes are sovereign nations but often navigating similar ecological locales as well as the same Federal Admin, though they have a different political relationship. This can focus on nearby tribes such as the Mashantucket Pequot Nation or Mohegan Nation OR a larger document **Status of Tribes and Climate Change (STACC) Report | North Central Climate Adaptation Science Center**
- P. 44: Could you explain how the RGGI cap & trade program tracks emissions and emitters, and how it is enforced?
- P. 52: Earlier (pg12), it was mentioned that Millstone's operational downtime due to an outage caused a dip in carbon-free energy. As the plant continues to age, we will doubtless experience more offline time due to outages and maintenance under a BAU scenario. Although it's not the same technology, we also saw this with the MIRA trash plant in Hartford, which blew one of its turbines trying to accommodate peak demand and led to huge garbage pileups while it was getting repaired. Has this downtime been accounted for in the Electric Power section?
- P. 54: "The amount of waste combusted in 2023 was assumed to remain constant into the future based on the assumption that existing combustion facilities within the state are operating at capacity." While in-state facilities are at capacity, both CT

DEEP and many municipalities are looking to reduce the amount of waste (~40%) that we currently ship out of state. The most feasible way to accomplish that would be with a new waste-to-energy plant, which would shift emissions from Scope 3 to Scope 1.

- That being said, I think it is great that we're looking at emissions from out-of-state waste, as these were excluded from state and regional PCAPs and CCAPs.
- P. 58 – what is the metric for determining high, medium and low for the varying criteria? I would consider coastal and inland wetlands high for biodiversity as they are “critically important”
  - Include the metric or methodology used for each chart.
  - Reassess coastal & inland wetlands, reforestation, and urban forests for biodiversity.
- P. 60 & 61 – Coastal and Inland Wetlands leans heavily on the benefits of Coastal wetlands, add more about inland wetlands.
  - This section does not discuss wetlands revitalization/restoration as a possible carbon sequestration strategy, even though you have a section about reforestation. Consider making that section “Reforestation and Restoration” and discuss the benefits/importance of wetlands restoration.
- P. 58 – spell out LULUCF in the appendix
- P. 62 – spell out BECCS acronym to introduce topic;
- General comment: I would have liked to see more comparison to other states in terms of climate progress.
- Overall, this is a very useful status report for continued accountability on climate change in the State.
- Add a 2025 hosted events session with links to the recorded state-led events related to climate change.

We appreciate CT DEEP's efforts in putting together this report. If you have any questions or follow-ups related to these comments, please reach out at [coneill@nvcogct.gov](mailto:coneill@nvcogct.gov).

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## CT Climate Progress Report Comments

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From Masino, Susan A. [REDACTED]  
Date Tue 2/3/2026 1:17 PM  
To DEEP ClimateChange <DEEP.ClimateChange@ct.gov>  
Cc Brown, Allie <Allie.Brown@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear DEEP / Allie Brown,

Is this the draft that was delayed until now (2/3)?  
I received the previous notice indicating this delay, and it does not seem that three days is sufficient to allow public comment. . .  
Was this draft sent prior?

If not, it is misleading to claim the comment period is 1/23 – 2/6 and the deadline should be extended accordingly.

Please include this as a public comment.

Susan Masino  
Trinity College

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**From:** Brown, Allie <Allie.Brown@ct.gov> **On Behalf Of** DEEP ClimateChange  
**Sent:** Friday, January 23, 2026 4:50 PM  
**Subject:** Connecticut's Climate Progress DRAFT Report Available for Public Comment

Hello,

You are receiving this email because you registered for the Governor's Council on Climate Change meeting on Tuesday, January 13, 2026. A downloadable draft of the Connecticut Climate Progress Report as well as the notice of opportunity for public comment is attached to this email. We are experiencing technical difficulties with our website software, so the draft report is not currently available online. However, once this issue is resolved, the draft report will be available on DEEP's [Greenhouse Gas Inventory](#) website. We expect this delay to be resolved no later than Tuesday, January 26.

DEEP is issuing this report pursuant to Connecticut General Statutes (CGS) Sec. 22a-200a(d), also known as the Global Warming Solutions Act (GWSA), as updated by Section 2 of [Public Act 25-125](#).

Written comments should be emailed to [deep.climatechange@ct.gov](mailto:deep.climatechange@ct.gov) with **“CT Climate Progress Report Comments”** in the subject line. All comments should be submitted by the close of the public comment period.

**Public Comment Period:**

- Start: by 5 pm, Friday, January 23, 2026
- End: **5 pm, Friday, February 6, 2026**

Additional meeting materials, including the presentation outlining the report, can be found on the GC3's [Meetings and Notices](#) webpage.

Best,

**Allie Brown (she/her)**

Research Analyst | Office of Climate Planning

Office of the Commissioner

Connecticut Department of Energy & Environmental Protection

79 Elm Street, Hartford, CT 06106-5127

Email: [allie.brown@ct.gov](mailto:allie.brown@ct.gov)

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*Conserving, improving, and protecting our natural resources and environment;*

*Ensuring a clean, affordable, reliable, and sustainable energy supply.*

[portal.ct.gov/DEEP](http://portal.ct.gov/DEEP)

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## CT Climate Report Comments

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From Kim Libera [REDACTED]

Date Wed 2/4/2026 6:20 PM

To DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

from Kim Libera, Cromwell, earth scientist

I'll be blunt. Enough of the climate hysteria & stick to common sensical goals that do not cause us to lose the little economy we have in this state as well as avoiding a further burden to the consumer esp with regard to electricity. Shoot for smaller targets where you can gain consensus instead of making war on people. CT consumers are heavily burdened with the prices of electricity which lead the contiguous US. This is largely due to lack of supply & frankly what we need is more energy dense supply aka natural gas. Natural gas is something in abundant supply in this country & the cleanest of the fossil fuels. It is vital for electricity & as a heating fuel. Solar & wind cannot sustain the whole grid so no matter how much you get emotionally charged by it, it cannot operate in the mainstream. Open up that pipeline. As you can see from the frigid winter we are having, reliable heat is vital for us New Englanders.

Over 55 years of the Clean Air Act, the US leads all nations in the reduction of pollutants plus greenhouse gases. CO2 is not a pollutant. It is a mild greenhouse gas. It is invisible & odorless. Do not mistake natural gas for the odor you experience at a farm. That odor is due to the fecal matter itself plus methanogen bacteria. Our reasons for improvement comes with better filtration & refining to weed out impurities. I review EPA emissions annually the US has reduced its sulfur emissions 90% & its nitrogen compounds in the range of 65-80%. We have reduced our mercury & lead by 65%. In fact gasoline worldwide is now free of lead. Our carbon compounds are down about 8% & we no longer manufacture CFCs. I want to point out that the true pollutants belong to the sulfur & nitrogen compounds. These are 2 common elements in the biosphere & earth's composition. Nitrogen comprises the majority of air molecules. Sulfur compounds are pollutive aerosols but not greenhouse gases. They are reflective aerosols. Nitrogen makes several compounds which are pollutants & greenhouse gases. Water vapor is your largest greenhouse gas by quantity & quality.

The free market must be accessible to the consumer rather than govt overreach. That would be tyranny for govt to tell us what kind of vehicle to drive or what stove to use. Renewable energy is geographic specific. The planet does not feature one temperature or air pressure or humidity nor is in receipt of the same level of solar radiation. Geography is distinct; soil taxonomy is distinct.

Renewables are not for everyone. First they are expensive. Solar roofs should be up to the homeowner or business. Not against solar on the roof but I do not approve acquisition of farm space. Solar arrays take up tremendous space & we have witnessed 2 farms close in the state & 2 large installs in the nation closed. Solar inhibits effective photosynthesis for crops & grasses underneath. If grass can't grow properly, there is less grass for livestock. No livestock no food. No fruits & veges then no food. I have advocated now for several years that if the state wishes to add solar that it consider the use of

largescale parking lots or the top floor of an open air parking garage. My alma mater did this 26 years ago with its athletic facility parking lots. CT has a temperate climate of 4 seasons. Our winters feature most of the low pressure cyclones & hence have more cloudy days.

I also think again for solar to utilize highway light poles to be adorned with a solar panel. This is to defer electricity use to a more sustainable one that can be made to power a single light pole. It conserves fuel from other sources.

Wind strength in CT is poor from the period July thru October. Here we feature warm, sunny days with a deep blue sky. The wind goes dead once CT heats up. The air stabilizes. You only get decent wind in the winter.

Wind turbines are very expensive & we don't usually get the bang for the buck. Wind in the ocean also contributes to mortality of whales because whales are sensitive to the accumulated wind noise in the turbines. On land we have bird & bat collisions & that is not good for the food chain. I recommend that the state use the new air foil concept that they are using in Europe. Here they repurpose highway medians with the air foil to capture the draft from passing traffic. Lots easier to install. Such design can be put on a roof.

I do advocate the use of nuclear & preferably with thorium & microgrids. If the target is smaller, it can be financed more easily. I do expect fusion to come on line as several plants are in progress of construction. MIT's SPARK is expected to come on line in 2027. All nuclear plants must address the security challenge be it from would be terrorists or environmental calamity. This means it resides in its own space with a long access road in. We have attained the necessary temps to achieve fusion & beyond & we don't use a container--we suspend the plasma with lasers in magnets.

Battery materials & storage are not something you buy at Home Depot. It comes from ore & ore has to be mined or purchased & everyone is competing against everyone else. A problem overlooked has to do with dead battery disposal. Right now there are only 2 sites in the US-Rochester & Arizona.

A couple options I advocate for that refers to industry & not the consumer when it comes to tidying up things. For those who are freaked out about CO2 the 2 largest industrial components are the steel industry & concrete. But we have some methodology now that can reduce their output. It does come with a cost stands to improve filtration of the air. We have a new concrete on the market that drastically reduces the carbon factor by mineralizing the concrete. It is derived from a change of ingredients & a lower oven temp. It locks the CO2 up as limestone. You get a very rigorous concrete. My only quibble would be that it not be used where there are rainy climates or salt intrusion.

The steel industry would have to use advanced steps to reduce its emittants. In Germany they were just able to replace the carbon with hydrogen. Note that when one observes a steel mill at work, the black material one may see is carbon slag (uncombusted/unfiltered). This is different from CO2. CO2 has no color. Overall I think some method of carbon capture would have to be applied to steel manufacture to make further gains. Understandably the industry might object so you would have to throw them a bone. But to levy further burdens on the public amounts to a power reach.

I do support the operations of coal scrubbin & carbon capture. Yes of course it is an expense but it does reduce the imprint w/o taking away all the plant food. Carbon capture is not meant to make CO2 go the way of the dinosaur. It's a method designed to improve air filtration in the location of industry.

There are 2 methods of capture & scrubbing: direct/dry scrub & indirect/wet scrub. First up is coal scrubbing. The US does indeed have plants that scrub. When coal is mined it is sent thru a rinsing thru a series of water cascades. The wet scrub is more thorough & like indirect captures is designed to remove as much emittant from the mix before it leaves the flue vent. It introduces a chemical reactant termed an amine & this mixes with the mix to make another substance. In the case of the coal plant, we get drywall. We can also derive potash.

I want to mention a few words about the deficiencies that come with renewables. First the sun may not always shine & that risk can slow the grid down & lead to brownouts given that the head of state will

protect industry vs consumers. Ditto the wind. EVs are not for everyone. First up the batteries are heavy & expensive & they don't work well in frigid weather & they pose a fire hazard locked up in the garage during hot weather. The vehicles are heavier & that means repaving with asphalt more often. Charging is not going to occur according to plan. If there are lots of people charging & lots of current on the grid, it's going to slow down. Cold weather will slow it down more. If there is a sizeable amount of charging occurring plus the business sector, the risk is brownout. That will lead to higher costs. At some point, the powers that be will favor industry over the residence & they will deliberately compromise the current. This experience is exasperated during natural hazard events. Figure people going on vacation. They have to plan a stop somewhere that offers charging & the line may be so long they have to take on a hotel expense for the night. Likewise, home charging is an expense b/c an electrician has to install new equipment. Given a natural hazard requiring evacuation, a congested line of traffic often results. This could be in a heat wave or cold wave & that imperils a person in their EV. Hyperthermia & hypothermia are life threatening. Floods involving salt water are also a hazard to the EV. So please do not go down the road of banning gasoline power vehicles. Likewise consider that electric heat is prohibitively expensive in our state & you want to add more burden to the consumer. Likewise with stoves. These items are essential & legal. Do not take over the consumer's choice on something so vital.

A means of losing part of the diesel sector in the transportation market can be accomplished with Maglev trains which can be strategically placed in areas to speed up rail transport w/o the diesel. This might attract some consumers off the road. China is way ahead of us on this.

For issues related to the cleanliness of the landscape & waterscape there are some technologies aboard. I advocate purchase of the innovative Interceptor Vessel to clean up plastic debris in any waterscape. Purchased over time these vehicles can rotate thru our waters & vacuum up debris. I think we know plastic is a huge problem here. Continue to reduce PFAs where we can. On single use containers it is time to recognize that we have tolerated too much of this litter so it is time to put some of it out of business. The packaging industry is moving quickly to come up with substitutes that are biodegradable and/or recyclable. After the plastic bag removal CT landscapes look better even in the areas where these bags ended up the most. Now it's time to take on the nip bottles. They add nothing positive to our society. Just litter & alcoholism. They are concealable & can be carried into a park. This only fosters more substance abuse & may facilitate a person getting into a vehicle while drunk. This produce is not vital as a hydration beverage or a nutrient. It's easy to say in the name of capitalism to rationalize it as ok but we have become too desensitized & now tolerate it. It only degrades the environment & makes it harder to collect it all.

As I see the state is concerned about flood waters, there are several innovative gadgets on the market that are designed to control some of this water. In fact one type was used in the Florida hurricane at Tampa Hospital. Such devices can be hauled by civil service patrol for an impending event. As far as an ocean device, the Dutch use some devices that use Bernoulli's principles to catch & recharge the incoming wave back to the sea.

In summary, I would just like to mention that we do not need hysteria or indoctrination when it comes to events of the natural world. Humankind does not make climate. Climate is simply the average set of atmospheric conditions in a geographic. CT remains in a temperate 4 season climate. Our Koppen classification is a warm summer, humid continental climate. There are periods when it's very hot, very humid, cold or frigid,, sometimes with no snow, sometimes with lots of snow, windy & non-windy, bright blue sunny days, & cloudy days. In the larger pitcher, 2026 is showing a negative polar vortex & a polar jet stream riding at low latitude. We have La Nina sea temps. I'm pleased to report that for 2 years now we have a good steady increase of ozone & the ozone hole has improved.

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## Climate change

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**From** mike papa [REDACTED]  
**Date** Thu 2/5/2026 11:22 PM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear at the DEEP .. Climate change it is going on for thousands of years. Ancient civilizations navigated this very well. Today however it is a different story. In fact we are prisoners of some short term mentality of (just for the moneys business as usual. ) Our governments at local , state and federal are made out of volunteers part timers not capable to understand the complexity of nature laws. As a result we end up spending lot moneys producing very little ! Most the accomplishments are only beneficial short term! Long term we are going to be BROKE because we are failing miserably to partner with nature laws. I wanted to warn you as an expert in AGRO ecosystem management for over 20 years. Sincerely Mike g Papa. [REDACTED]  
Sent from my iPhone

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## CT Climate Progress Report Comments

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**From** McCarthy, Shirley [REDACTED]  
**Date** Fri 2/6/2026 9:58 AM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

To whom it may concern,

I am confident that you understand the importance of trees in nature-based solutions in meeting our CO2 emission targets. Policies that would facilitate this include:

- Not allowing forests to be destroyed by solar facilities.
- Protecting riparian buffers.
- Not allowing any gas pipelines to psychologically and economically undermine the effort to achieve renewable energy.
- Educating tree wardens and the public about how critical trees are in mitigating climate change but also how critical they are to human health. There is ample medical data that if you live near trees, you live longer; if they are cut down, your pre-mature mortality increases. Air pollution is the silent killer that kills 6-7 times the number of people that die from road accidents each year, and 100's of times more than the number that die from terrorism or war each year. Cognitive function, dyslipidemia, metabolic syndrome, and cardiovascular function improve living near trees. Additionally, some trees secrete phytoncides that improve immune function and decrease stress.
- Finally, our planet has lost 73% of its wildlife and N. America has lost 3 billion birds in the last 50 years. Our wildlife needs trees!

Sincerely,

Shirley McCarthy, MD, PhD

Professor, Yale School of Medicine

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## January 26 Draft Climate Progress Report

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**From** John Gaucher [REDACTED]  
**Date** Fri 2/6/2026 11:50 AM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Connecticut, New England, and the world face many environmental challenges. However, climate change or (AGW) global warming is not one of them. Rather, our persistent allocation of tremendous resources and government power towards resolving a manufactured issue is causing many, many problems.

One need only look at countries such as Germany, Denmark, and the UK to see what lies in our (CT's) future if we continue this reckless set of policies in pursuit of an issue entirely based on computer models, which are NOT science. Further, the models are a series of mathematical equations in which not even one of thousands of variables is actually known with certainty. This explains why every single prediction, whose time horizon has passed, has been not only wrong, but not even close to reality.

It's interesting, don't you think, that climate change is made to be the cause of every condition, even opposing conditions, i.e. it causes heavier and more frequent rain and droughts. It will lead to less snow, until it leads to more snow. The report suggests climate change as the cause of the recent 1000yr storm in Naugatuck Valley. Really? There is absolutely no scientific evidence or even a reasonability test that could support this contention. But this is just par for the course; keep the people scared and the funds and ill-conceived policies won't find resistance. The report also mentions other storms that have caused damage, again, without any link to increased atmospheric CO2 as their cause, as a reason to continue this pursuit.

Of course, the IPCC's reports (and their non science models) are the basis for action. I find it interesting the IPCC's confidence levels are not statistically based as science typically demands, but rather vague propaganda language (likely, and very likely, etc.) Are you aware that the IPCC "scientists" only include scientific papers that support their ideology? Every opposing paper is discounted. In the scientific literature, the theory of AGW has been completely invalidated across many disciplines. However, those that cite actual science are personally attacked and their reputations smeared.

Curious how the IPCC and governments around the world NEVER mention the benefits of an atmosphere with higher levels of CO2 such as higher plant yields, increased pest resistance, less need for irrigation, the greening of the planet, etc. I note that your report only includes negative impacts. Why is that?

The sea level rise predictions are ridiculous, and could only be fabricated by, you guessed it, non-scientific models!! Sea level rise by 2100 is projected, again by models, to be between 16.5 and 54.7 inches. WOW, that's precise and how interesting all these predictions are so far out that by the time they are found out to be so wrong, the damage is done and no one can be held accountable.

If climate change were only an academic debate, there would be no cause for concern. However, when model projections are used to allocate massive amounts of public funds (in spite of contrary peer-reviewed science) and to pass extremely costly and restrictive laws, that's where problems start. For example, spending so much public money on electric vehicle charging stations is a complete waste of money and it is basically infrastructure funded by everyone for the benefit of wealthy people that can actually afford electric vehicles (without the subsidies).

Charging stations around the country are failures. Are you not aware? Or does experience simply not enter into the decision matrix? Why in the world would we double down on what has failed domestically and around the world. Windmills and solar are not just failures, they are very costly failures. They provide no dispatchable electricity, drive up the cost for everyone, are environmentally damaging, hurt local manufacturing (again see Germany) and just make people poorer for no benefit.

Electric buses? Again, failure after failure all over the world!

I don't have time to go point by point, but I think you get my larger point if this even gets read after the first sentence.

However, I'll end on a positive note. Geothermal heat pumps and pursuing mini and micro nuclear energy are worthwhile initiatives.



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

Keith Ainsworth  
Acting Chair

Timothy J. Bishop

Linda Bowers

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Cinzia Lettieri

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Paul Aresta  
Executive Director

VIA ELECTRONIC MAIL

February 6, 2026

[deep.climatechange@ct.gov](mailto:deep.climatechange@ct.gov)

Re: Connecticut Climate Progress Report Comments

The Council on Environmental Quality (Council) has reviewed the draft report developed by the Connecticut Department of Energy and Environmental Protection (DEEP), in consultation with the Office of Policy and Management (OPM) and the Governor's Council on Climate Change (GC3) and offers the following comments.

The Council supports the actions being undertaken by DEEP and others to reduce greenhouse gas (GHG) emissions. As noted in the Council's annual report, [\*Environmental Quality in Connecticut\*](#)<sup>1</sup>, Connecticut's climate is getting warmer and wetter. And while the development of zero-carbon generation capacity, the use of energy storage and electric drive vehicles, and the preservation of land are increasing, Connecticut is not on track to meet its GHG emissions targets by 2030, 2040 and 2050.

The Council encourages DEEP to expand and enhance its efforts to reduce GHG emissions and to address climate mitigation and adaptation. Without urgent action, the impacts of climate change, such as poor air quality, droughts and flooding, sea level rise, and habitat alteration will adversely impact the quality of life in Connecticut.

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

Sincerely,

Paul Aresta  
Executive Director

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<sup>1</sup> Connecticut Council on Environmental Quality, <https://portal.ct.gov/ceq/publications/publications/annual-report-main>

**To:** Department of Energy and Environmental Protection (DEEP) electronically submitted to [deep.climatechange@ct.gov](mailto:deep.climatechange@ct.gov) (CT Climate Progress Report Comments)

**From:** Robert LaFrance, Director of Policy for CT, National Audubon Society, CT/NY Office

**Re:** Comments on Connecticut's Draft Climate Progress Report

**Date:** September 6, 2026

Please find our comments on certain sections of the *Connecticut's Draft Climate Progress Report*

Draft Report Language (page 32):

The Role of Sequestration in Reaching Net-Zero

“Connecticut’s annual GHG inventory historically only included data on gross emissions, which means that only the sectors responsible for emitting GHGs were tracked. Following Executive Order 21-3 implementing recommendations of the Governor’s Council on Climate Change, starting in 2022, DEEP began using the land use, land use change, and forestry (LULUCF) output of EPA’s State Inventory Tool to estimate the amount of carbon being sequestered in Connecticut’s natural and working lands as part of the GHG Inventory. With the establishment of a net-zero by 2050 target in Public Act 25-125, DEEP is now required by law to include carbon sequestration in the inventory.”

Audubon CT’s Comment:

There are many studies demonstrating that carbon sequestration and CARBON STORAGE can make a meaningful impact to helping achieve our greenhouse gas reduction targets.<sup>1</sup> One study indicates that carbon sequestration/storage can provide up to one-third of the cost-effective measures necessary to achieve these targets.

Once referred to as “negative emissions” active carbon sequestration removes greenhouse gases like carbon out of the atmosphere and stores that carbon in plants, soil, and other places that are NOT in our atmosphere. Conversion of forests and wetlands into other land uses reduces both the total amount of carbon stored and the overall rate of sequestration of carbon out of the atmosphere.

Our comment is that negative emissions should be accounted for in the emissions section of the report, not in the mitigation section. Natural systems that store and sequester carbon should be the baseline above which other forms of greenhouse gas emissions are added. By not including the value of natural systems in the baseline of DEEP’s greenhouse gas emissions, DEEP seems to be discounting the value provided by these natural ecosystem services.

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<sup>1</sup> See: B, Griscom et al. <https://www.pnas.org/doi/10.1073/pnas.1710465114> and testimony on HB 5004 <https://cga.ct.gov/2025/envdata/TMY/2025HB-05004-R000303-Griscom,%20Bronson,%20Vice%20President-Conservation%20International-Supports-TMY.PDF>

Draft Report Language (Page 35):

“Forest conservation and management, reforestation, and agricultural soil carbon offer relatively low-cost, shovel-ready options that deliver significant benefits for biodiversity, climate resilience, public health, and rural economies. Forest pathways are particularly promising for their mitigation benefits. However, despite their cost-effectiveness, NWL pathways may not be scaled sufficiently to meet Connecticut’s full net-zero needs, particularly given land constraints and uncertainty about the overall trajectory of the NWL sink.”

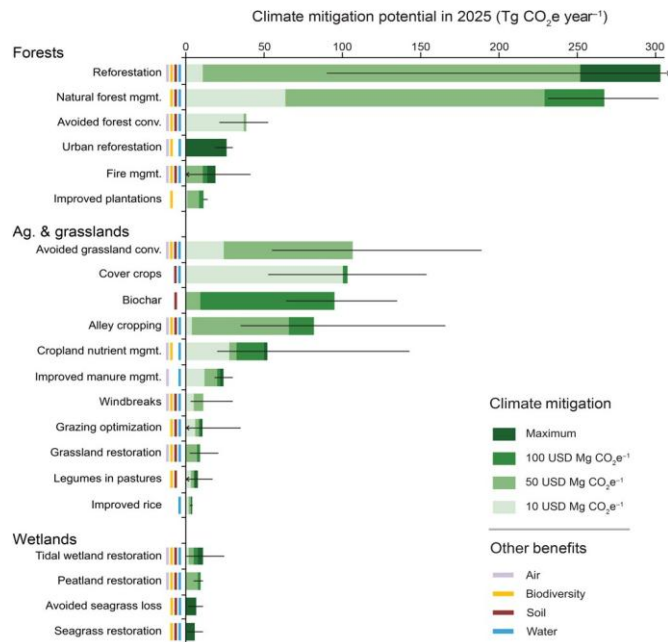
Audubon CT’s Comments:

**THE SCIENCE:**

Scientific papers show that **Natural Climate Solutions (NCS) can provide over one-third of the cost-effective climate mitigation needed between now and 2030 to stabilize warming to below 2 °C.** Alongside aggressive fossil fuel emissions reductions, NCS offer a powerful set of options for Connecticut to deliver on the Global Warming Solutions Act while **improving soil productivity, cleaning our air and water, and maintaining biodiversity.**

See B. Griscom et al:  
<https://www.pnas.org/doi/10.1073/pnas.1710465114>

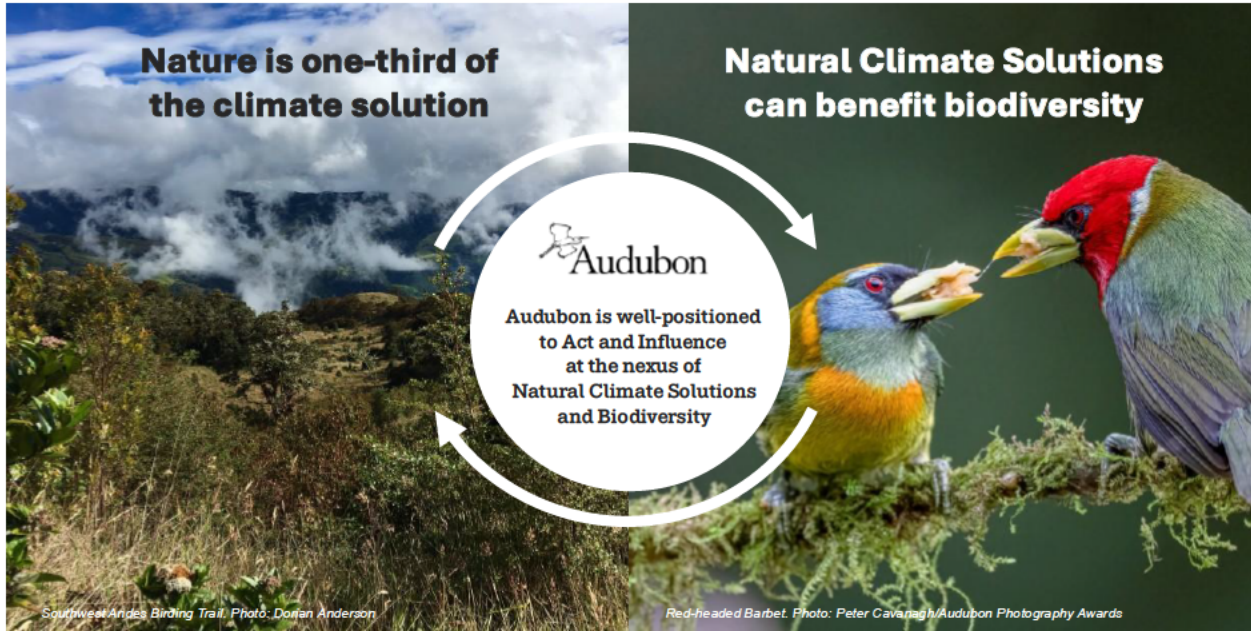
And, J. Fargione et al:  
<https://www.science.org/doi/10.1126/sciadv.aat1869>



Although Nature-Based Solutions--or NWL Pathways as described in the draft report, “may not be scaled sufficiently to meet Connecticut’s full net-zero needs,” that should not be the end of this discussion in the final report. We request that a sentence be added:

“Yet, while Nature-Based Solutions (NBS) (which includes Natural Climate Solutions) may not be scaled sufficiently to meet Connecticut’s full net-zero needs they still offer cost-effective options that can provide up to one third of those net zero needs. NBS also provides additional ecosystem services benefits, like maintaining biodiversity, and improving soil productivity. NBS can reduce climate risk, such as wetlands for flood attenuation and coastal resilience, forest cover for watershed resilience, and urban canopy for heat mitigation.”

See: <https://cga.ct.gov/2025/envdata/TMY/2025HB-05004-R000303-LaFrance,%20Robert,%20Dirof%20Policy%20-CT--National%20Audubon%20Society-Supports-TMY.PDF>



**New Communications Tools Support Our External Engagement** Audubon

New BFI Infographic

New BFI Explorer

New BFI Blog

Bird

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## Comments on the Climate Progress Draft Report

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**From** [REDACTED]  
**Date** Fri 2/6/2026 1:02 PM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

To the report authors –

First, I want to applaud the degree of detail and the positive results that are included in Connecticut's Climate Progress Report. This report provides a very useful summary of the statistics and programs relevant to DEEP's efforts to deal with the causes and effects of climate change. Especially welcome is the discussion of the role of nature-based solutions, as is called for in PA 25-125. All of this is very helpful information.

That said, I feel a sense of incompleteness with this report. On the one hand, the report includes a good summary of what should be done, but often without a lot of detail as to how it should be done and by whom. On the other hand, the report also identifies many things that are being done, but often without clearly stating why this is the right thing to do or how a particular action helps fulfill the goals of the climate plan. In particular, as I read this report, I was trying to get a better understanding of the strategies and goals behind the activities discussed. I was also looking to get a handle on the role of DEEP and other state entities have to play in the implementation of the climate change plan. I hope I do not come across as too critical, as I know that there is a lot of work behind this report.

Before I go further, though, I would like to acknowledge that the federal government's change in position regarding efforts relating to climate change has made things much more difficult. Losing the federal government as a reliable partner is highly damaging, even devastating, in many ways. The report makes this all very clear. It is all highly unfortunate.

That said, let me get to my points. I would suggest that there should be more in this report as to the who's, what's, where's and why's associated with Connecticut's climate change effort.

What do I mean by that?

On page 18 of this report there is a bulleted list of items that are based on the 61 recommendations included in the January 2021 Report: *Taking Action on Climate Change and Building a More Resilient Connecticut for All*. The list in the current report does make me very interested, but it also leaves me looking for the details.

For example, one of the bulleted items states: "Build back better with resilient and sustainable infrastructure and land use, informed by the best available science and engineering standards." While I can imagine what activities might fall under this bulleted item, what I really want to know is how DEEP or other entities affiliated with the state seek to bring this condition about. I could go back through the individual GC3 working group reports and learn about the various recommendations made, but that still would not tell me what efforts have chosen by the state leadership. If this is a progress report and these items are being laid out in this report, I would encourage at least some statement on each individual item.

I will say that the report does a good job in explaining how carbon sequestration fits in within the overall climate change mitigation effort. Even in this section, however, I found myself wishing the report said more about the approaches to be taken and the strategy behind those choices – what are the outcomes sought and how would they be achieved?

Take, for example, forestry. The report states that 98% of the carbon sequestered in natural and working lands occurs in forest land combined with that in urban forests. The report also states that 72% of the forestland in Connecticut is privately owned. As such, working with private forestland owners should be a high priority, as the report indicates. However, it does not provide a lot of detail as to the approach to be taken and the outcome sought due to the state effort. As a reader, that is what I would like to know - what is currently being done, what is being proposed, what is the desired outcome and who is to take charge of the effort.

By the way, the report does mention the term ‘climate-smart forestry’, but it does not say what that term means.

Meanwhile, I would also note that DEEP is directly responsible for managing some 5% of the land area of the state, with the bulk of that land in State Forests. By coincidence, I have been reading several of the recently-written state forest management plans and, in my view, the Division of Forestry has done a good job both in terms of improving their description of the goals and procedures employed with respect to the management of individual state forests. This is especially true as related to explaining the policies, methods and intentions that relate to carbon management and climate change. I would also mention that the discussions on biodiversity and old forestland management are done well. This, I would suggest, is something worth noting in this report.

On the urban forestry side of things, my experience is that municipalities often play the key role in terms of achieving broad-based outcomes. This is because the actions and the policies embraced by the municipality with respect to tree management and tree care are often influential the residents and property owners of that city or town, because municipal government is often most aware of the specific needs of that city or town, and the interests of the municipalities are often given high regard by DOT and the utilities with respect to trees within a community. In this report, I was hoping to see more about efforts to reach out to municipalities. However, state-based efforts alone are not enough. Recognition of the initiatives that are occurring at the municipal level are also important, as are those of the local non-profits and other similar entities. A summary of state level progress towards dealing with climate change seems to me to incomplete if it does not include some recognition of and accounting for these local efforts.

With regards to natural and working lands and nature-based solutions generally, I would like to make one additional point. While many of the more engineered approaches to reducing greenhouse gases have ancillary benefits (e.g. – reducing vehicle miles will also likely result in fewer motor vehicle deaths), almost all nature-based solution proposals come with a whole set of additional benefits. For example, urban trees, in addition to sequestering carbon, also provide many public health benefits, help build communities, promote biodiversity, help control stormwater runoff, and so on. Also, many nature-based solutions develop increased capabilities over time in terms of providing these benefits, such as sequestering carbon. For example, individual larger trees tend to sequester more carbon as well as store carbon, reduce air pollution and help manage storm water, than do individual smaller trees. This might be worth noting.

To sum things up, many times, various plans and similar documents begin with some form of a vision statement that indicates where an organization wishes to get to through this plan. It strikes me that Connecticut has either a very simply expressed vision for dealing with climate change – which is to reduce the amount of atmospheric carbon as much as can be done to keep the level of atmospheric carbon as close as possible to the desired levels – or it has a very complex vision, as it seeks to organize and prioritize among all of the various ideas and options expressed through the GC3 working

groups. As the state's leadership seeks to mediate between this simple vision and the more complex vision, I am hopeful that there is a clear recognition of the need for strong leadership.

I find in this report a strong sense of purpose. Part of the progress documented in this report could be that of describing how the complex vision fostered through the GC3 process is coming into focus as a unified plan.

Losing federal support is, indeed, tragic. That, in turn, creates an even greater need for state and local leadership.

Respectfully,

Chris Donnelly  
Durham, CT  
CT DEEP (retired)

Comments of Nathan Frohling, Director of External Affairs, The Nature Conservancy  
2026 Connecticut's Climate Progress DRAFT Report Opportunity for Written Comment

February 6, 2026

Thank you for the opportunity to comment on the Connecticut Climate Progress Report. The Nature Conservancy (TNC) is an organization that is actively addressing global climate change through various initiatives aimed at reducing emissions and protecting natural habitats. We emphasize the urgency of climate action, and that every fraction of a degree matters in limiting warming and avoiding severe impacts. Our efforts aim to assist 100 million people at risk from climate-related emergencies by restoring ecosystems that mitigate the effects of climate change, such as storm surges and wildfires. We have also provided resources and facts about climate change to educate the public and encourage community discussions. Overall, TNC is committed to tackling the root causes of climate change and promoting sustainable solutions.

In Connecticut, TNC is actively engaged in addressing climate change through various initiatives and advocacy efforts. We strongly supported climate legislation, such as HB5004, which strengthened the state's climate goals and promoted renewable energy. The Conservancy also collaborates with other organizations to implement nature-based solutions, which include practices like urban forestry, land conservation, and wetland restoration. These efforts not only combat climate change but also enhance water quality, prevent natural disasters, and protect wildlife habitats. TNC's commitment to nature conservation is integral to Connecticut's climate resilience and sustainability efforts. Additionally, we promote the deployment of clean, renewable energy at the pace and scale required to minimize the cost of all energy resources to customers over time and maximize consumer benefits consistent with the state's environmental goals and standards, including, but not limited to, the state's greenhouse gas reduction goals established in section 22a-200a.

Currently, Connecticut is not on track to meet its emission targets as was shown in the business as usual (BAU) projections. To achieve long-term sector-wide emission reduction goals, it is imperative that emission reduction efforts identify cost-effective and equitable strategies involving a wide variety of stakeholders. While several sector-specific plans to reduce emissions have been made in the last decade, an economy-wide, multiple sector decarbonization plan should be the basis for accountability in which progress could be measured and needed adjustments made through time. To that end, we applaud state efforts under the Climate Pollution Reduction Grant to address both short and long-term decarbonization planning.

Our motivation at TNC is to look at what is necessary to overcome the odds and put in place what is needed to help ensure Connecticut reaches its statutory carbon-reduction commitments. This is core to our collective and urgent commitment to the climate crisis. With this in mind, we would like to reiterate our comments and suggestions given at the Governors Council on Climate Change on January 13, 2026:

Starting with rivers and coasts, we strongly encourage restoration of river connectivity and improving ecosystem health of inland and coastal wetlands to reduce flood risks for vulnerable communities, improve biodiversity, and increase carbon sequestration. We need to continue investing in collaborative projects like the restoration of the Bride Brook saltmarsh at Rocky Neck State Park to demonstrate the benefits of healthy wetland systems.

One of our forest management goals is to address the problem of inconsistent terminology about forest management goals and practices which create misunderstandings, lead to roadblocks, and hinder management action for resilient forests. One example and one opportunity that will meaningfully improve forest-related decision making and action is establishing a clear, shared vocabulary for managing forests for resilience.

For climate adaptation and related topics we should: 1) continue to support and advance an urban forestry network for our cities, 2) support community-based climate mitigation and adaptation planning at the municipal and regional level with an emphasis on nature-based solutions, 3) extend and make more durable funding for key programs like DEEP's Climate Resilience Fund, 4) adopt climate progressive forestry management practices on state forest lands that support species migration and forest ecosystem integrity in the face of climate change and 5), further support municipalities in advancing stormwater management authorities.

And finally, for climate mitigation we have several priorities. First, increasing attention is needed on transmission. As energy demand grows, so does the need to modernize and make the grid's infrastructure more efficient and cost effective. We'd like to extend legislative support for this by building on the relevant parts of Senate Bill 4. Secondly, we believe offshore wind needs greater recognition of its ability to meet both energy demand and climate goals affordably and at the pace and scale needed. The current pause in offshore wind offers us an opportunity to inform decision-makers and the public about the advantages of offshore wind so when the time comes the support is there to act. Energy efficiency is the cheapest form of energy as the energy you don't use. We must prioritize energy efficiency programs as financially prudent ways to lower electric bills while also addressing energy demand and climate goals. We believe in reviving attention on renewable siting and finally note that solar energy is a resource we'd like to see increased support for, both behind the meter and grid-scale solar, both of which have an important role in reducing emissions while diversifying the energy mix needed to reliably and affordably meet growing energy demand.

We believe that these actions around environmental conservation, climate adaptation and mitigation will help Connecticut achieve its statutory emission targets. Thank you for the opportunity to submit our comments on Connecticut's Climate Progress Draft Report.

Connecticut Botanical Society



P.O Box 9004

New Haven, CT 06532-0004

connecticutbotanicalsociety@gmail.com

February 5, 2026

## **CBS Comments to CTDEEP on CT Climate Progress Report**

### **January 2026 Draft**

Thank you for the opportunity to review this CT Climate progress report, issued per the Global Warming Solutions Act (GWSA, Public Act 24a-200a). I also listened to the zoom recording of the public hearing including the comments by the public on this report.

This review, on behalf of CBS, focuses on the need for more effective implementation of nature-based solutions, whose benefits are well-summarized in the Climate Progress Report. The report states that CT forests and urban trees (about 1.8 million acres) contributed 98% of the 4.9 million metric tons (MMT) of natural carbon assimilation, that took place in Connecticut in 2023. The forested land also provides valuable habitat for native plant communities.

A variety of Grant Programs related to Nature-Based Solutions are summarized in Table 3. Encouragingly, Mr. Ryan's stated, in his comments for the Nature Conservancy, that federal funding remains in place for climate-progressive management on state forest lands. Tree Planting is one of the specific Green House Gas (GHG) Emissions reduction measures listed in Table 2.

However, the Climate Progress Report cites little progress with regard to the 71% of the state's woodland that is privately owned, including important botanical resources.

Comments by Cory Swift expressed concerns about excessive losses of CT agricultural land to large scale solar array construction. Similarly, siting of solar arrays often results in excessive loss of forest cover, along with the climate and societal benefits (health, environmental justice, and climate resilience) that forest provides. The CT Botanical Society has opposed several recent solar array applications in Hamden, Bethany, and Norfolk, commenting to the Connecticut Siting Council and to municipal Land Use Boards.

The Final GC3 Report of the Forest subgroup included multiple other suggestions for statewide outreach/incentives by CTDEEP to achieve a "No Net Loss of Forest" policy goal, that were not mentioned in this progress report. To reduce losses of privately owned forest, municipal land use boards, the CT Siting Council, and Connecticut Engineering firms need to better encourage development site plans that minimize forest losses, maximize replacement tree plantings, and discourage unsuitable siting choices. For such outreach to have teeth, Susan Chapin noted in her comments that state legislation is needed. Ideally that would include including the "No Net Loss of Forest" policy goal.

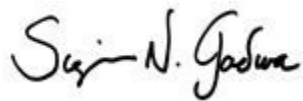
To generate support, more emphasis is needed on the link between GHG reduction goals and *the cooling benefits of forests and urban trees* (from shade and transpiration), which substantially reduce energy usage for air conditioning, and provide economic benefits to municipalities, including increased home values and tax revenues in well-treed neighborhoods.

The Climate Progress Report could better explain the link between forest cover and Climate Resilience in inland communities. Improved Climate Resilience is one of the listed goals in the December 2021 GC3 Recommendations (Executive Order 21E). The role of coastal wetlands in meeting this goal is thoroughly tabulated in Table 3, but not the role of forest cover and healthy forest soils in reducing flooding damage from the higher-intensity storms associated with climate change, especially on hillsides and in floodplains.

Work on the role of soil conservation in addressing climate change was effectively presented by Lilian Raiz of the CT Soil and Water Council. Climate planning needs to stress the connections between the trees and soils of forests, for effective long-term carbon sequestration, and the hydrologic moderation which fosters community climate resilience and good water quality.

To help generate public support for effective policies to reduce Greenhouse Gas Emissions (GGE), that include No Net Forest Loss - in addition to the suite of current strategies focused on reduced combustion and energy usage - one can stress that both approaches provide major air quality and public health benefits, because forests and urban trees provide large-scale filtration and dilution of fine particulates and other air pollutants.

Respectfully Submitted,



Sigrun N. Gadwa, MS  
Plant Ecologist, Soils Scientist, Botanist

Chair, Ecology & Conservation Committee, CT Botanical Society  
Principal, Carya Ecological Services, LLC, 183 Guinevere Ridge, Cheshire, CT 06410



# SIERRA CLUB

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

February 6, 2026

Climate Planning Team  
Connecticut Department of Energy & Environmental Protection  
79 Elm Street  
Hartford, CT 06106  
Via email: [deep.climatechange@ct.gov](mailto:deep.climatechange@ct.gov)

Dear DEEP Climate Planning Team,

On behalf of the Sierra Club and our more than 30,000 members and supporters in Connecticut, thank you for the opportunity to provide comments on [DEEP's draft CT Climate Progress Report](#).

Across the globe and here in Connecticut, climate change is accelerating. It is the greatest threat ever to human kind. Globally, the last ten years have been the 10 hottest years on record, average sea level has risen 8–9 inches since 1880, wildfires are becoming more frequent and severe, and extreme weather events have intensified. As DEEP's draft report outlines, Connecticut is experiencing accelerated coastal erosion, a warming of Long Island Sound, warmer hottest and coldest days of the year, increasing annual rainfall, decreasing annual snowfall, and more intense rainstorms.

In 2025, there were 23 weather and climate disasters in the U.S. with at least \$1 billion in damages. These 23 events caused an estimated 276 fatalities and cost a total of \$115 billion in damages.<sup>1</sup> DEEP outlined recent extreme events in Connecticut, as does another recent report from the Center for Climate Integrity.<sup>2</sup> For example, the August 2024 storm that tragically took the lives of two people and dumped more than 14 inches of rain in Oxford, washing out roads, destroying dozens of homes and businesses, and causing an estimated \$300 million in damages. Extreme rainfall has also devastated our \$4 billion agricultural industry, with \$21 million in farm losses in just two weeks in July 2023. Without action, the impacts of climate change will continue to accelerate and have more deadly consequences and serious costs. More human lives will be lost, human health will be negatively impacted, and people will suffer. The rising cost of climate impacts are a threat to individuals and communities and to our financial and economic systems.<sup>3</sup>

Connecticut must meet the mandate of our state law, the Global Warming Solutions Act, and do our part to mitigate the systemic risks that are posed by climate change. The law requires greenhouse gas emissions be reduced by 45% below 2001 levels by 2030, 65% by 2040, 80% and net-zero by 2050. Our state law aligns with many other states and nations all following scientific understanding of the reductions needed to avoid the worst impacts of climate change. While the current federal Administration is ignoring science, denying the existence of climate change, and turning back critical efforts to address the existential threat of climate change, Connecticut must do better. We must meet our mandate.

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<sup>1</sup> <https://www.climatecentral.org/climate-matters/2025-in-review>

<sup>2</sup> [https://climateintegrity.org/uploads/media/CCI\\_Connecticut\\_Impacts\\_Costs\\_2026.pdf](https://climateintegrity.org/uploads/media/CCI_Connecticut_Impacts_Costs_2026.pdf)

<sup>3</sup> <https://greenfuturesolutions.com/wp-content/uploads/2026/01/Recalibrating-Climate-Risk-Report-Final.pdf>

**Phone: (860) 578-4750 -- Email: [Connecticut.chapter@sierraclub.org](mailto:Connecticut.chapter@sierraclub.org)**



# SIERRA CLUB

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Connecticut must also protect residents through adaptation and resiliency, as well as protect residents from costs where polluters are responsible.

DEEP's draft CT Climate Progress Report shows that Connecticut met the 2020 mandate of reducing greenhouse gas emissions 20% below 1990 levels. But, as the report indicates, we are not on track to meet the 2030, 2040 or 2050 mandates.

Sierra Club Connecticut urges DEEP, and all decision makers, to act with the urgency that climate change requires and get on track. There is no time to waste. We urge the following measures be part of DEEP's recommended actions in order to mitigate and adapt to climate change:

- **Connecticut DEEP, and all other state agencies, must comply with the state's climate and clean energy laws in permits, grants, contracts and agency decisions.** DEEP itself should lead by example to meet the mandated targets of the Global Warming Solutions Act. Connecticut DEEP should no longer approve permits that will add more greenhouse gas emissions. Currently DEEP is considering a final decision on tentatively approved permits for the Iroquois Gas Company. These permits will add over 80,000 metric tons of CO<sub>2</sub>e emissions per year. These permits, and future permits for other facilities, must be rejected as they are incompatible with the mandate to lower greenhouse gas emissions.
- **Revise how DEEP's inventories emissions.** 1) DEEP's Greenhouse Gas Inventory was changed to remove emissions from power plants that make electricity here and export it to other states. Connecticut must take responsibility for the pollution that is made here by calculating it and taking action to reduce it. Reducing these emissions is not only important for climate, it is critical for public health as the same power plants that produce climate-harming pollution are also producing health-harming pollution. 2) Methane gas leaks are grossly underreported. A Boston study shows that methane gas leaks were six times higher than previously estimated, and more than half of emissions may be leaks from so-called end uses, such as compression stations and meters, along with boilers, furnaces and other appliances, rather than from pipelines.<sup>4</sup> DEEP should investigate and implement data methods for methane leaks that incorporate all of the leaks, not just those reported from lost gas in pipelines
- **DEEP must develop and release detailed plans to meet the mandates of the Global Warming Solutions Act.** As we have noted in previous comments, three sectors - transportation, buildings, and electricity - are responsible for 83% of greenhouse gas emissions as reported by DEEP in its August 2025 Greenhouse Gas Inventory. As the biggest sources of emissions, these three sectors require significant and meaningful action steps to be identified and swiftly implemented. DEEP must develop plans for each of these sectors that include measurable goals, measurable emission reduction calculations, timelines, and transparent tracking of progress. Without goals, measurable emission reductions, tracking and reporting back these actions may have little to no impact on reducing emissions.
- **Reduce red tape and administrative burdens to facilitate and accelerate the growth of the renewable energy** and competition of renewable energy projects in Connecticut.
- **Make polluters pay for their share of climate damages.** Fossil fuel companies knowingly fueled the climate crisis for decades, and Connecticut residents and communities are now

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<sup>4</sup><https://research.noaa.gov/urban-areas-across-the-us-are-undercounting-methane-emissions-a-new-study-shows/>



# SIERRA CLUB

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paying the costs out of pocket and through higher taxes, insurance premiums, utility bills, and disaster recovery expenses.

DEEP must act now to meet the statutorily mandated emission reductions set out in the Global Warming Solutions Act and protect Connecticut residents, businesses and communities from climate change by implementing the transformational changes needed to reduce greenhouse emissions and maintain a livable climate.

Thank you for your attention to our comments.

Sincerely,

Samantha Dynowski, State Director  
Sierra Club Connecticut

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## CT Climate Progress Report Comments

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**From** New CT Farmer [REDACTED]  
**Date** Fri 2/6/2026 2:33 PM  
**To** DEEP ClimateChange <DEEP.ClimateChange@ct.gov>

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear DEEP Climate Team,

My name is Ella Kennen, and I coordinate the New Connecticut Farmer Alliance (NCTFA), a statewide network of over 700 first-generation, beginning, and small-scale farmers. Our work focuses on farm viability, land access, and the long-term resilience of Connecticut's food and agricultural systems.

Thank you for the care, rigor, and transparency reflected in the draft Connecticut Climate Progress Report. We appreciate the conservative accounting approach and the clarity with which the report describes both progress to date and the scale of reductions still required to meet statutory climate targets.

We encourage DEEP to give greater attention, within the report's narrative framing, to the climate relevance of agricultural lands. As the report itself notes, land-based strategies are among the most cost-effective and impactful climate mitigation approaches available to the state. At the same time, agricultural lands—particularly working farmland—remain under-considered and under-resourced in climate planning, in part because of limited data on soils, land-use change, and management practices.

Avoiding the conversion of farmland to development is itself a climate strategy. Beyond soil carbon and ecosystem services, keeping land in active agriculture supports more localized food production, which can reduce transportation demand, associated emissions, and infrastructure pressures across the food system—benefits that are not fully captured in current inventory methods. It also slows conversion of land to more carbon-intensive development.

We also encourage the report to more clearly acknowledge the limitations of existing data related to agricultural soils and practices, and to signal the importance of future investment in improved measurement and tracking. Naming these gaps would strengthen the report and help guide subsequent planning and research efforts.

Finally, we suggest emphasizing that land-use decisions made outside of DEEP—particularly those related to housing, infrastructure, and regional planning—will materially influence the state's ability to meet its climate goals. Strong cross-agency coordination around land use and development patterns will be essential to achieving long-term emissions reductions and climate resilience.

Thank you again for the opportunity to comment and for DEEP's continued leadership on climate policy in Connecticut.

Sincerely,  
Ella Kennen  
she/her/hers  
Coordinator



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### **The New Connecticut Farmer Alliance**

[www.newctfarmers.com](http://www.newctfarmers.com)

[www.facebook.com/NCTFA](https://www.facebook.com/NCTFA)

Instagram: [@newctfarmers](https://www.instagram.com/newctfarmers)

A chapter of the National Young Farmers Coalition - [www.youngfarmers.org](http://www.youngfarmers.org)

# CONNECTICUT Land Conservation Council

**Comments on Draft Connecticut Climate Progress Report - January 2026**

**Submitted by Amy Blaymore Paterson, Executive Director**

**Via Email: [deep.climatechange@ct.gov](mailto:deep.climatechange@ct.gov)**

**February 6, 2026**

On behalf of the Connecticut Land Conservation Council (CLCC), I am pleased to submit comments on the draft Connecticut Climate Progress Report - January 2026.

As the statewide umbrella organization for Connecticut's ~110 land trusts, CLCC's mission is to elevate and strengthen land conservation across the state. This includes ensuring the protection of Connecticut's natural and working lands, prioritizing the vital role of nature-based solutions in addressing climate resilience and biodiversity loss, and empowering land trusts and communities as partners in these efforts.

Through that lens, we offer the following comments related to the sections of the Draft Climate Progress Report that focus on Nature-based solutions (NBS) and Natural and Working Lands (NWL) in the context of implementation requirements under Public Act 25-125, Sections 2 and 12.

**NBS framing is implied but not explicit:** The report recognizes that NWLs have significant carbon sequestration potential and that biological carbon removal may be more feasible than technological approaches. This recognition is important because it elevates NWL as an essential climate mitigation strategy. However, while the report references and defines NWL as including “forests and woodlands, grasslands and shrublands, croplands and rangelands, wetlands, and urban greenspaces” (Appendix B), it does not explicitly describe these as NBS, thereby missing an opportunity for policy integration across sectors under PA 12-125.

**Clarification of comment on NWL sink uncertainty:** On page 33, the report states that “[f]orest conservation and management, reforestation, and agricultural soil carbon offer relatively low-cost, shovel-ready options that deliver significant benefits for biodiversity, climate resilience, public health, and rural economies ... However, despite their cost-effectiveness, NWL pathways may not be scaled sufficiently to meet CT's full net-zero needs, particularly given land constraints and uncertainty about the overall trajectory of NWL sink.”

This statement requires clarification. Is the uncertainty in future NWL sequestration capacity due to the earlier statement (page 32) acknowledging the limitations of the LULUCF output of EPA's State Inventory Tool in tracking policy implementation, i.e., is this a data collection issue? If so, and recognizing DEEP's statement that “it intends to explore options, within available resources, to update its carbon sequestration methodology”, the Report should include a firm commitment to address this to ensure accurate data that will support the implementation of a NBS initiative, as required by PA 12-125 Section 12.



If, however, this is intended to be a conclusory statement that NWL will not be sufficient to meet CT's full net-zero needs, then the Report should identify decisive policy actions and investments to stabilize and enhance NWL for sequestration and storage, which would also align with PA 12-125.

**Integration of NWL into the overall mitigation narrative:** Across much of the report, transportation and energy dominate discussions of strategy, while NWL appears primarily in the technical sections, despite acknowledgment of its importance as a carbon sink and sequestration pathway. Given PA 25-125's focus on cross-sector integration and Section 2's call for integrated emission-reduction pathways, the current report structure may underrepresent NWL's strategic role.

Likewise, the earlier report sections describing extreme weather impacts (flooding, storms, infrastructure vulnerabilities, etc.) do not consistently connect these impacts to nature-based resilience strategies. It would better support the objectives of PA 25-125, including cross-sector integration, by highlighting how NBS can reduce climate risk, such as wetlands for flood attenuation, forest cover for watershed resilience, and urban canopy for heat mitigation.

**Programs and Funding:** Finally, while the report includes a table of existing grant programs that support action in the NWL sector (at least for forestry and conservation), these programs are not evaluated against climate targets. Such an assessment would help determine whether current investment levels are sufficient to achieve the required sequestration and storage outcomes and identify implementation gaps.

Overall, the draft Climate Progress Report makes important progress in recognizing the value of NWL within Connecticut's climate action strategy. Strengthening the framing and analysis of NWL expressly as nature-based solutions will improve alignment with PA 25-125 and help support clearer implementation pathways toward Connecticut's statutory climate goals.

We appreciate DEEP's leadership and are committed to continued collaboration.

Thank you for this opportunity to present our comments. If you have any questions, please contact me anytime.



**Save the Sound**<sup>®</sup>

Action for our region's environment.

**Comments of Save the Sound  
on the  
Draft Report on Connecticut's Climate Progress**

**February 6, 2026**

Save the Sound appreciates the opportunity to provide the following comments on the draft version of “Connecticut’s Climate Progress” report issued by DEEP on January 23, 2026. The mission of Save the Sound is to protect and improve the land, air, and water of Connecticut, New York, and Long Island Sound. We use legal and scientific expertise and bring people together to achieve results that benefit our environment for current and future generations.

Public Act 25-125 requires, inter alia, the Connecticut Department of Energy and Environmental Protection (DEEP) to report periodically to the joint standing committees of the General Assembly having cognizance of matters relating to the environment, energy and technology, and transportation on:

- An inventory of CT’s progress towards its statutory greenhouse gas (GHG) emissions levels<sup>1</sup>, including carbon sequestration;
- A schedule of proposed regulations, policies, and strategies designed to achieve these GHG emissions levels;
- An assessment of the latest scientific information and relevant data regarding global climate change; and
- The status of GHG emission reduction efforts in other states and countries.

**Connecticut’s Latest Greenhouse Gas Inventory and Emissions Trends**

While we are pleased to note that 2022-2023 greenhouse gas (GHG) emissions declined in several key sectors, particularly transportation and buildings, it is important not to lose sight of the fact that overall emissions during this period increased 1.5%.<sup>2</sup> The largest sector increase during this period was from the electricity sector (generally a strong performer when it comes to emissions reductions due to our participation in the Regional Greenhouse Gas Initiative and state clean energy mandates).<sup>3</sup> DEEP attributes this rise to a

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<sup>1</sup> Connecticut’s Global Warming Solutions Act is codified at Conn. Gen. Stat. § 22a-200a et seq.

<sup>2</sup> 1990-2023 Connecticut Greenhouse Gas Emissions Inventory at 5 (August 2025), [https://portal.ct.gov/-/media/deep/climatechange/1990-2023-ghg-inventory/deep\\_ghg\\_report\\_1990-2023-final.pdf?rev=c4562f29c0cd4dc4a43c7d67cfa83593&hash=B7E9F86289DCEFFCE0AAE1AA08637750](https://portal.ct.gov/-/media/deep/climatechange/1990-2023-ghg-inventory/deep_ghg_report_1990-2023-final.pdf?rev=c4562f29c0cd4dc4a43c7d67cfa83593&hash=B7E9F86289DCEFFCE0AAE1AA08637750)

<sup>3</sup> Draft Report at 13, Table 1.

prolonged outage at the Millstone nuclear plant, resulting in lower-zero carbon energy production and a greater reliance on existing fossil-fuel resources.<sup>4</sup> This underscores the need for Connecticut to pursue a robust portfolio of zero-carbon resources that includes solar and offshore wind if we are to meet our zero-carbon electricity by 2040 goal and broader economy-wide GHG reduction requirements.

Further, DEEP’s analysis demonstrates that Connecticut’s current policies are insufficient to meet our 2030, 2040, and 2050 emissions reductions.<sup>5</sup> This shortfall is predicted based on a “business-as-usual” , scenario that, considers “programs and policies that exist today” as well as announced cuts and rollbacks to federal programs and funding enacted by the Trump administration and Congress.<sup>6</sup>

### **Future Opportunities Under Consideration**

To address this projected shortfall, the draft report highlights several “Current and Future Clean Energy Plans” that the state is working on. Among these are the “Integrated Resources Plan,” the “Hydrogen Roadmap,” a Geothermal and Air Source Heat Pump” plan, and ongoing efforts to explore the expanded use of nuclear power in Connecticut. While hydrogen could play a limited, though important role, in decarbonizing hard-to-electrify industrial processes, it is not an answer to reducing emissions in the remainder of our economy.

Likewise, nuclear is unlikely to provide a cost-effective solution to meeting our GHG reduction requirements on the necessary timeline. While we have no objection to the state exploring this option, we caution that the technology is still far from widely deployed<sup>7</sup> and the best estimates suggest that it may be several decades before SMRs become commercially viable on a wide scale, as developers continue to run into cost overruns, construction delays, and a pattern of project cancellations following significant investment. The experience of the three projects completed worldwide indicate a 12-13 year project schedule (rather than the developers’ 3-4 year estimates).<sup>8</sup>

At the same time, we believe that advocates for this technology tend to underestimate the costs of building and deploying SMRs. Looking at the most recent nuclear construction experience in the United States, the construction of two new reactor sites at Georgia’s Vogtle plant was originally expected to cost \$14 billion

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<sup>4</sup> Draft Report at 12.

<sup>5</sup> See Draft Report at 14 and 15, Fig. 2.

<sup>6</sup> Draft Report at 13.

<sup>7</sup> Globally, there are currently only three SMRs in operation. Two are in Russia and the third is in China. Additionally, a fourth SMR is currently under construction in Argentina. Institute for Energy Economics and Financial Analysis, *Small Modular Reactors: Still Too Expensive, Too Slow and Too Risky* at 6 (May 2024), <https://ieefa.org/resources/small-modular-reactors-still-too-expensive-too-slow-and-too-risky>.

<sup>8</sup> *Id.* at 12.

but the project ran into significant construction delays and cost overruns with current cost estimate placing the projects at more than \$30 billion.<sup>9</sup> While that project was a large-scale reactor proposal (which we are no longer seeing much interest in here in the U.S.), it is illustrative as many observers note that SMRs are likely to be even more expensive on a per megawatt basis, as they don't have the advantages of scale to spread out costs.<sup>10</sup> For example, Utah's NuScale SMR project proposed in 2015 was given an initial cost estimate of \$3 billion, which eventually ballooned to more than \$9 billion before the project was cancelled.<sup>11</sup> For comparison purposes, this is "around 250% more than the initial per megawatt cost for the Vogtle project."<sup>12</sup>

As we evaluate alternatives, we must ensure that we are accurately and realistically estimating the relative costs and benefits of such alternatives. The costs of new generation resources should be compared on a level playing field in order to determine the best opportunities for our energy investments. We must also consider the opportunity costs of our investment decisions should we make unwise decisions.

With respect to the IRP, the starting point for the discussion of planning for new generation resources should begin with and build upon the work already conducted pursuant to the 2020 IRP<sup>13</sup> and the 2022 Procurement Plan Update.<sup>14</sup> In the last IRP, DEEP focused on a number of objectives and strategies, including:

- Decarbonizing the electricity sector (reaching 100% zero-carbon electricity by 2040)<sup>15</sup>
- Ensuring the equity and affordability of the state's electricity system
- Reforming the ISO-NE wholesale energy procurement process to ensure the recognition of state policy priorities

These all remain critically important goals. We must also be cognizant of materially changed circumstances at the federal level that are already adversely impacting the development of new renewable energy resources. This makes efforts at the state and regional level all the more important.

Reviewing the planning foundation that has been laid out in the most recent iteration of the IRP, we note that DEEP has recognized that the statutory enactment of the state's 100% zero-carbon electricity goal "makes it essential for DEEP to write zero emission resources in its future procurement and other policy

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<sup>9</sup> Associated Press, "Georgia nuclear plant again delayed at cost of \$200M more" (Feb. 16. 2023), [Georgia nuclear plant again delayed at cost of \\$200M more | AP News](#).

<sup>10</sup> Utility Dive, "The collapse of NuScale's project should spell the end for small modular nuclear reactors" (Jan. 31. 2024), <https://www.utilitydive.com/news/nuscale-uamps-project-small-modular-reactor-ramanasmr-/705717/>.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> CT DEEP, 2020 Integrated Resources Plan (Oct. 2021), <https://portal.ct.gov/-/media/deep/energy/irp/2020-irp/2020-connecticut-integrated-resources-plan-10-7-2021.pdf?rev=732dd6192d1b489fad4170f417442521&hash=F1C287D7A5C42A3383AA07B52FF41729>.

<sup>14</sup> CT DEEP, 2022 Procurement Plan Update (Aug. 31, 2022), <https://portal.ct.gov/-/media/deep/energy/irp/2022-procurement-plan-update.pdf?rev=b7724157aa9d43b69da3f4ef671c4683&hash=93AA37937BD776A66981EF0CF7CA1748>.

<sup>15</sup> See Gov. Ned Lamont, Executive Order No. 3 (Sept. 3, 2019). Available at: <https://portal.ct.gov/-/media/Office-of-the-Governor/Executive-Orders/Lamont-Executive-Orders/Executive-Order-No-3.pdf%20rel=>.

recommendations for the electric sector.”<sup>16</sup> Achieving this goal explicitly requires lowering, not increasing, our reliance on fossil fuels, including natural gas.

We highlight the missed opportunity in this regard in Connecticut’s failure to secure any additional offshore wind resources from the tri-state solicitation in 2023/24. While we recognize that the state has issued multiple rounds of zero-carbon RFPS since that time, they have not included offshore wind resources which have the largest potential for generating significant amounts of reliable clean energy in the region. Unfortunately, the posture of the current federal administration makes securing any additional offshore wind resources unlikely in the near-term.

### **The Priority Climate Action Plan**

The Priority Action Climate Plan, released in spring 2024, identifies “near-term, high priority implementable measures across five economic sectors to advance HG mitigation in the state.”<sup>17</sup> It identifies 14 specific policies which, taken together, are estimated to reduce 6,880,00 metric tons of CO<sub>2</sub>e by 2030 and 29,847,000 metric tons of CO<sub>2</sub>e by 2050.<sup>18</sup> However, there is no discussion or analysis regarding how close these measures (*if fully implemented*) would get the state to meeting its climate reduction requirements. The report does indicate that

Using the Business-As-Usual (BAU) scenario as the baseline for emissions, modeling will be conducted to determine how much GHG can be reduced year over year to meet the 2030, 2040, and 2050 targets. Additional analyses will be conducted to determine overall benefits from implementing the recommended greenhouse gas reduction measures, resulting workforce needs, the authority needed to implement the measures, and results from public feedback. The final plan will be submitted to EPA by July 1, 2026.

While we recognize that some funding for discrete components of this plan has already been secured, we are concerned about the ability to implement the full suite of identified measures (which themselves would appear to fall short of what is needed to meet our goals) in the absence of continued support from the federal government.

### **Conclusion**

The draft CT Climate Progress Report highlights the importance of our current climate mitigation efforts. It demonstrates that while we have made some progress, more must be done. We must continue to implement and advance our existing programs (no backsliding) while identifying the new opportunities and programs that will allow us to achieve our goals in 2030 and beyond.

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<sup>16</sup> 2022 Procurement Plan Update at 2.

<sup>17</sup> Draft Report at 29.

<sup>18</sup> Draft Report at 29-31, Table 2.

Save the Sound thanks DEEP for the opportunity to submit these comments, and we look forward to continued engagement with DEEP and other stakeholders in order to achieve the state's clean energy and decarbonization goals.

Respectfully submitted,

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**STATE OF CONNECTICUT  
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION**

CONNECTICUT CLIMATE PROGRESS : PUBLIC ACT 25-125  
DRAFT REPORT : FEBRUARY 6, 2026

**WRITTEN COMMENTS OF THE CONNECTICUT NATURAL GAS CORPORATION,  
THE SOUTHERN CONNECTICUT GAS COMPANY, AND  
THE UNITED ILLUMINATING COMPANY**

The Connecticut Natural Gas Corporation (“CNG”), The Southern Connecticut Gas Company (“SCG”), and The United Illuminating Company (“UI”, and collectively the “Companies”) provide the following Written Comments, in response to the Notice of Opportunity for Public Comment (the “Notice”), issued by the Connecticut Department of Energy and Environment Protection (“DEEP” or the “Department”) on January 23, 2026.

The Companies appreciate the opportunity to provide public comments on the Draft Report. The Draft Report provides a comprehensive assessment of Connecticut’s progress toward statutory greenhouse gas (“GHG”) reduction targets, as well as the challenges posed by climate impacts and federal actions. DEEP’s accounting of progress shows that Connecticut met its 2020 target ( $\geq 20\%$  below 1990 levels), has kept total emissions below 2019 levels, and saw 2023 declines in transportation and residential buildings. Under DEEP’s Business as Usual (“BAU”) case, Connecticut is not on track for its 2030, 2040, or 2050 targets (projected  $\sim 34\%$  below 2001 by 2030 and  $\sim 44\%$  by 2050). Closing the gap requires, amongst other things, accelerated action in electrification of transportation and buildings, the two highest causes of GHG emissions.

As an integrated electric and gas utility group, the Companies’ role spans both the electric and gas systems, with the obligation to operate safe, reliable networks while at the same time advancing cost-effective emissions reductions consistent with the State’s climate objectives.

Natural gas remains an integral part of Connecticut's energy system during the transition. CNG and SCG are committed to advancing the State's Comprehensive Climate Action Plan ("CCAP") goals in a just and equitable manner, keeping customer safety and system reliability at the center of our plans. Avangrid's corporate objectives are aligned with Connecticut's emission goals; the Companies will continue to pursue measures and technologies that reduce methane and CO<sub>2e</sub> while coordinating with electric-sector investments so the transition is thoughtful, realistic, and balanced for customers and communities.

UI has a critical role to play and is committed to advancing cost-effective emission reduction policies and programs balancing affordability, reliability and safety. Importantly, continuing to make progress towards the State's climate goals requires a modernized grid that is reliable and resilient, which requires a combination of infrastructure investment and effective clean energy programs. Modernizing our grid can only be accomplished with a supportive regulatory environment that allows for timely recovery of the necessary capital investments. Importantly, advancing electrification efforts will also require an increase in electric supply to meet the increasing demands that are beyond the levels energy efficiency measures will be able to offset.

The Companies support the State's overall decarbonization goals and offer comments grounded in three core principles:

- Affordability for all customers
- Reliability and resilience of the electric system
- Cost-effective, equitable, and scalable clean energy programs

In continuing to advance towards achieving the state's GHG goals, emphasis should be placed on highest value reductions per ratepayer dollar, avoiding duplicative program structures, and maintaining transparent, stable modeling as the 2026 CCAP is developed.

Consistent with the Draft Report’s Section 2 strategies, the Companies emphasize that utilities are well positioned to translate policy direction into on-the-ground implementation, integrating transportation electrification, weatherization and heat pumps, demand management, and clean energy supply with the grid so that emissions reductions are both measurable and cost-effective. Through customer-facing programs and system planning, utilities provide the technical capabilities, infrastructure integration, and rigorous measurement and verification (“M&V”) needed to deliver results with a focus on affordability and reliability.

The Companies’ infrastructure is at the core of enabling building and transportation decarbonization, and the Companies fully support DEEP’s vision for accelerating electric vehicle charging infrastructure, expanding EnergizeCT energy efficiency offerings, scaling statewide heat pump adoption, and advancing energy storage initiatives — all of which DEEP identifies as essential to achieving Connecticut’s 2030, 2040, and 2050 decarbonization targets. The Companies recognize, however, that there is a significant need to make the necessary infrastructure grid investments to enable the level of transportation and building electrification required to achieve those decarbonization targets. Energy efficiency programs, demand response, non-wires solutions (“NWS”), and distributed energy resources (“DERs”), like energy storage, certainly have a role to play. However, they will not be able to fully offset the incremental demands on the electric grid driven by the levels of transportation and building electrification needed to lower the two highest causes of GHG emissions to achieve the State’s decarbonization goals and overall climate strategy. UI’s recent regulatory outcomes have created significant shortfalls in cost recovery that directly jeopardize UI’s ability to do this. UI has already been compelled to eliminate some planned system investments, including projects tied to clean-energy enablement and grid modernization,

in response to PURA's substantial underfunding of UI's rate request, including the lack of timely capital investment recovery.

### **Strategic Focus Areas**

UI has submitted written comments in several PURA dockets related to transportation electrification, building electrification, conservation and load management / energy efficiency, and the renewable energy tariff program successor program study. The Companies will not restate all those positions here but rather touch above the highlights and most salient points.

#### **1. Building Electrification.**

The Companies support a weatherization-first, electrification-ready approach that helps keep energy upgrades affordable by ensuring buildings have the proper building shell and necessary upgrades, before installing heat pumps. This approach is especially important for low-income households and multifamily properties, where barrier remediation is essential to full program participation and ensures that clean-energy benefits are delivered equitably and cost-effectively. UI also leverages other state or federally funded programs when available to facilitate barrier remediation. Prioritizing these buildings allows upgrades to be deployed at scale and supports meaningful emissions reductions without driving unnecessary costs for customers.

To maintain reliability and resilience, electrification must be coordinated with grid readiness by encouraging off-peak usage and directing deployment toward areas with available capacity identified through hosting-capacity analyses, while expanding integrated planning and cost effective Non-Wires Solutions. UI's weatherization, energy-efficiency, and heat-pump programs, delivered through EnergizeCT, will continue to prepare homes and businesses for deeper decarbonization in a manner that protects affordability, supports system reliability, and advances clean-energy programs that are equitable, scalable, and cost-effective for all customers.

## **1. Transportation Electrification.**

The Companies support the continuation of the Statewide Electric Vehicle (“EV”) Charging Program, which it has been administering since 2022. In its Annual Report filed on August 1, 2025 in Docket No. 25-08-06, UI reiterated that the Program is designed to “enable a self-sustaining Zero Emissions Vehicles (“ZEV”) market on the scale necessary to meet the State’s ZEV goals and greenhouse gas reduction targets, and achieve ratepayer, electric system, economic, health, and environmental benefits by equitably transitioning all communities across Connecticut to EVs.” This is achieved through customer-facing EV charging infrastructure incentives, with increased incentives for customers located in underserved communities, indicating a clear focus on affordability and access to the benefits of transportation electrification for all customers.

To optimize the integration of EV load into the distribution system, managed charging should continue to be a foundational requirement for residential EV Charging Program participation, as it helps to minimize energy consumption during times of peak demand, thereby encouraging more efficient use of the electric grid. In its “Connecticut Electric Vehicle Charging Program Manual: 2025 Comprehensive Program Manual” filed with the Authority on March 1, 2025 in Docket No. 24-08-06, UI reiterated this position, stating that “Managed Charging allows the utilities to adequately integrate the growing, new demand on their systems from EVs”.

## **2. Energy Storage (Front-of-the-Meter and Behind-the-Meter).**

As detailed in UI’s written comments submitted on February 4, 2026 in Docket No. 25-02-14<sup>1</sup>, UI strongly supports extending the Energy Storage Solutions (“ESS”) Program through 2035. Consistent with those prior comments, UI recommends establishing clear annual MW/MWh targets, budget levels, and administrative funding aligned with the successor renewable tariff

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<sup>1</sup> [DN 25-02-14 UI Written Comments](#)

framework to maintain market continuity, ensure telemetry compliance, and support dependable dispatch operations.

These recommendations support DEEP’s portfolio objectives by ensuring storage provides measurable emissions, reliability, and affordability benefits as electrification grows. Consistent with Connecticut’s established regulatory precedent for utility-controlled assets, the Companies further note that rightsized, strategically sited storage—planned and operated under PURA oversight—offers a proven, cost-effective alternative to traditional infrastructure, strengthens feeder-level reliability, and safeguards Renewable Energy Credit (“REC”) integrity for co-located systems through auditable metering and dispatch.

### **3. Successor Renewable Tariff Programs (RRES/NRES/SCEF).**

UI’s recent comments in Docket No. 25-02-14, referenced above in the Energy Storage section of this document, align closely with the Draft Report’s emphasis on affordability and customer protection, reaffirming that successor-tariff decisions should prioritize affordability, reliability, and equitable, scalable clean-energy programs. UI noted that stable structures such as monthly netting have worked effectively for years and can transition smoothly into a successor tariff with only minor system updates, none of which are expected to result in significant cost impacts for customers at this time.

Consistent with the Draft Report’s cost-discipline focus, UI also reiterated support for competitive solicitations with maturity requirements to reduce speculative bidding and protect ratepayers. UI further emphasized maintaining clear billing practices and keeping Public Benefits charges non-bypassable to ensure equitable cost-sharing. Across all points, UI’s recommendations reinforce and support the Draft Report’s core priorities, which the Companies affirm.

### **4. Electric Power Sector: Reliability, Renewable Energy, and Portfolio Balance.**

The Companies support DEEP's expedited clean-energy solicitations and additional storage procurement, paired with a supportive regulatory framework that provides timely cost recovery. As electrification accelerates, prudent contingency planning, including demand flexibility, additional storage capabilities, scheduling buffers, and appropriate contractual safeguards will help ensure the grid remains reliable and that customers are protected from schedule, performance, or delivery risks that may arise as large-scale clean-energy projects come online. Because Connecticut's emissions accounting is consumption-based, the CCAP should include import-emissions contingencies measures, such as incremental storage and demand flexibility, to manage portfolio risk.

### **CONCLUSION**

The Companies share DEEP's urgency to accelerate decarbonization while protecting reliability, affordability, and upholding public safety. Sustained progress depends on reliable, resilient, modernized electric and gas systems supported by a regulatory framework that allows timely, predictable recovery of prudent investments, alongside cost-effective, scalable programs that minimize non-participant impacts. The Companies looks forward to continued collaboration with DEEP, PURA, ISO-NE, municipalities, and community partners as the CCAP proceeds.

Respectfully submitted,

CONNECTICUT NATURAL GAS CORPORATION,  
THE SOUTHERN CONNECTICUT GAS COMPANY, and  
THE UNITED ILLUMINATING COMPANY

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