



December 22, 2023

**Connecticut's Climate Pollution Reduction Grants Program: Priority Climate Action Plan
Notice of Request for Public Comment**

The Connecticut Department of Energy and Environmental Protection (DEEP) issues this Request for Public Comment with a survey to inform the development of a Priority Climate Action Plan (PCAP) and a grant application to implement that plan with funding from the EPA Climate Pollution Reduction Grant (CPRG), designated by the federal Inflation Reduction Act (2022). This request for public comment follows a public meeting on December 18 that provided an [overview of the CPRG](#) and the [proposed actions](#) in the PCAP the state may implement to reduce air pollution that is warming our planet known as greenhouse gases, clean up our air, and provide important benefits to communities in the region, such as reduced energy bills, improved public health, and more jobs.

I. Request for Input on How Connecticut's Actions to Reduce Greenhouse Gas Emissions Benefit Communities

DEEP would like your public comment on how the state's propose actions to reduce greenhouse gases (GHG) (listed in Section II below) will benefit communities in Connecticut through direct or indirect benefits, [especially for low-income and disadvantaged communities](#) (LIDAC, as defined per EPA). DEEP would also like your input on any potential negative impacts and/or potential barriers to these actions and how we can work to address them.

This input is critical for Connecticut to win funding from the national competition of the Climate Pollution Reduction Grant to implement the actions to reduce GHGs. EPA will score Connecticut's application on how well its actions benefit communities and how the state addresses any potential negative impacts of those actions on communities. The survey below will ask you questions about different types of benefits for each action, and you can select which benefits you think you would see if the action was implemented in your community. There will also be options to provide more detailed written comments about each action and public comments in general. Please fill out the survey by **January 12, 2024**.

Your public comment is important to the success of our application!

Survey link:

https://www.surveymonkey.com/r/CT_CPRG

This public comment survey can take ~10 minutes to complete with the option to spend more time to provide detailed comments on each climate action proposed by the state. Due January 12, 2024.

We prefer that you use the survey to submit comments to allow us to track community benefits by action, but you may also email written comments to deep.climatechange@ct.gov.



II. Connecticut’s Implementation-Ready Greenhouse Gas Reduction Actions

For an explanation of each action below see these [slides](#) and [recording](#) of the Dec. 18 public meeting presentation.

Transportation Sector Actions	Establish electric vehicle incentive pathways for advanced technology vehicles (full battery electric, plug-in hybrid and fuel cell electric vehicles—collectively “ZEVs”)
	Deploy electric vehicle chargers statewide to support light-duty and medium-heavy duty fueling needs
	Replace existing school buses with zero-emission vehicle school buses in environmental justice communities
	Transit bus electrification—purchase buses based on the next 5-year Battery Electric Bus program
	Idle Reduction ZeroRPM® for truck mounted attenuators (TMAs) for the Connecticut Department of Transportation's Crash Unit - purchase TMAs that have ZeroRPM® systems to prevent idling, reduce fuel consumption and greenhouse gas emissions
	Expansion of the Microtransit Program with a focus on rural areas to provide an on-demand, accessible, shared-ride service within a zone
Residential and Commercial Buildings Sector Actions	Support increased adoption of heat pumps statewide
	Expand funding for the Residential Energy Preparation Services program to address health and safety barriers to weatherization
	Expand energy efficiency programs under the Conservation and Load Management Program
	Support deployment of networked geothermal systems
Electric Power Sector Actions	Reduce electric sector emissions while maintaining electric system reliability using demand response and/or energy storage
	Develop a pilot project to use hydrogen for port operations and long duration electric storage using hydrogen
Waste and Materials Management Sector Actions	Provide funding to municipalities to implement food scraps diversion programs, including grants to construct the infrastructure necessary to divert food scraps from landfills and incineration
Natural and Working Lands Sector Actions	Plant trees in urban areas to increase carbon storage/sequestration and mitigate pollution and other climate change impacts in underserved communities



The actions listed above were drawn from and are consistent with the priorities identified in the plans and policy recommendations of the [Governor's Council on Climate Change](#) and the [state's sector-specific climate plans](#). *The actions are **not** the only actions that Connecticut can take to address climate change.* These actions were selected because they met the implementation-ready requirements of both the CPRG PCAP *and* the requirements and constraints of the CPRG Implementation Grant Notice of Funding Opportunities, including:

- Alignment with prior state climate action plans, including the Governor's Council on Climate Change reports and the state's sector-specific climate plans.
- Being competitive for funding when qualitatively evaluated against EPA's scoring criteria for the implementation grant, including maximizing GHG reductions in the near-term of 2025-2030 and significant benefits to LIDAC in the state (see Section III).
- Being implementable within the 5-year period of performance for this grant, which requires all grant funds to be spent by October 2029, including having the existing authority to implement.
- Having a funding gap and need that could be met by the funds available from the CPRG alone or in combination with other funding sources.

As the state develops its PCAP, each of the actions listed above will be quantitatively analyzed for how much carbon emissions reductions they can achieve and a qualitative analysis of the benefits to LIDAC. The findings of these analyses will be published in the PCAP and used in the implementation grant application.

REMINDER: Please fill out the [SURVEY](#)! Your responses will inform the required qualitative analysis of the benefits to LIDAC from the actions.

III. CPRG Implementation Grants Objectives and Scoring Criteria

As stated above, your responses to the [SURVEY](#) will inform the state's analysis of the benefits and potential negative impacts of the GHG reduction actions to low-income disadvantaged communities (LIDAC). Maximizing the benefits of the actions is one of EPA's primary objectives of the CPRG Implementation Grant (stated below) and the state will also be scored on how well it meets these criteria and GHG reductions. This section also includes EPA's examples of potential benefits of the GHG reduction actions. The survey references these example benefits and makes it easy for respondents to give us public comment on whether they think these potential benefits will be realized in their community.

EPA's goals and objectives for the CPRG Implementation Grant

- Implement ambitious measures that will achieve significant cumulative greenhouse gas reductions by 2030 and beyond;
- Pursue measures that will achieve substantial community benefits (such as reduction of air pollution), particularly in low-income and disadvantaged communities;



- Complement other funding sources to maximize these greenhouse gas reductions and community benefits; and
- Pursue innovative policies and programs that are replicable and can be “scaled up” across multiple jurisdictions.

EPA CPRG Evaluation Criteria

Two important requirements of the Implementation grants from which DEEP will be seeking funding are the 1) quantification of estimated GHG emission reductions in terms of metric tons of CO₂-equivalent and 2) a low-income disadvantage communities (LIDAC) benefits analysis.

- 1) *GHG emission reductions*. We must develop a robust calculation of how much each action in Section II will reduce greenhouse gases (GHGs) for both shorter and longer timescales. The actions most likely to be funded under this opportunity are those that will demonstrably lead to large reductions in GHG emissions by 2030.
- 2) *LIDAC benefits*. We must conduct an analysis that quantifies the direct and indirect benefits and potential disbenefits to LIDAC. We must describe any anticipated negative impacts to LIDAC and provide concrete strategies to mitigate those risks. The state must also identify the geographic areas that may be affected by the proposed GHG reduction actions. Actions that can demonstrate substantial benefits to LIDAC will score higher. The survey responses will be included in this analysis.

EPA Examples of Expected Direct and Indirect Benefits to LIDAC

These examples of benefits to LIDAC from GHG reduction actions provided by EPA are included in the [SURVEY](#) to allow you to easily tell us if you think you would see these benefits in your community.

- Direct and indirect benefits from mitigating climate impacts (e.g., reduced risk of wildfires, drought, extreme weather events, and/or sea level rise);
- Increased resilience to climate change from GHG reduction measures that have both GHG reduction benefits and climate adaptation benefits (e.g., heat island mitigation strategies help reduce GHG emissions by reducing energy demand and help reduce health impacts due to extreme heat);
- Improved public health resulting from reductions in co-pollutants (e.g., CAPs, such as NO_x, ozone, PM_{2.5}, and HAPs), such as reductions in new asthma cases and reductions in hospital admissions and emergency department visits;
- Creation of high-quality jobs and new workforce training opportunities in low income and disadvantaged communities with an emphasis on expanding opportunities for individuals that face barriers to employment;
- Improved access to services and amenities;
- Decreased energy costs and improved energy resilience;
- Reduced noise pollution;



- New green space and/or community beautification;
- Increased access to transportation alternatives;
- Improved housing quality, comfort, and safety; and/or,
- Other benefits identified during consultation with residents of low-income and disadvantaged communities

IV. Overview of the CPRG Planning and Implementation Grants

As you respond to the [SURVEY](#) you may be thinking of additional actions the state can take to address climate change and benefit your community. While the PCAP’s list of actions is meant to be implementation-ready and meet other criteria as described in Section II, following the publication of the PCAP and submitting the application to the Implementation Grant, DEEP will launch the development of a Comprehensive Climate Action Plan (CCAP). The survey in this notice is focused on the PCAP and Implementation Grant. The CCAP process will have additional opportunities for engagement and public comment. Please keep this in mind as you review the actions and respond to the survey. An overview of the CPRG planning and implementation grant deadlines is below for your reference.

The CPRG program has two different but related phases:

Phase 1 — Planning Grants

Connecticut received \$3 million in formula funding to develop these main deliverables:

Priority Climate Action Plan (PCAP)

Near-term, high-priority, implementation-ready measures to reduce GHG pollution

**The PCAP is due
March 1st, 2024**

Comprehensive Climate Action Plan (CCAP)

Addressing all significant GHG sources and sectors in Connecticut, establishing both near-term and long-term GHG emission reduction goals and strategies and serving as a roadmap to meet the reach the state’s statutory GHG emission reduction targets of 45% below 2001 levels by 2030, a zero-carbon energy supply by 2040, and 80% below 2001 levels by 2050

**The CCAP is due
Summer 2025**



Phase 2 — Implementation Grants

EPA established a competitive process with individual grants ranging between \$2 million to \$500 million to eligible entities. EPA will award between 30 and 115 grants nationwide.

Eligible entities in Connecticut:

Lead organization (DEEP) and other state agencies, regional governments (Councils of Governments), municipalities, tribal nations, and coalitions of such entities.

Funding eligibility:

Implementation activities **must** be described in a PCAP developed in Phase 1.*

**Applications due
April 1st, 2024**

Connecticut’s PCAP and CCAP will draw from and build upon the plans and policy recommendations of the [Governor’s Council on Climate Change](#) and the [state’s sector-specific climate plans](#).

* If you are an eligible entity considering applying for an Implementation Grant, you should review the PCAP that covers your geographic area. This may be the state plan or a regional plan (see map below).

Development of PCAPs and CCAPs in Connecticut

In addition to the state plan, three Metropolitan Statistical Areas (MSAs, per EPA’s language), the Pequot Tribal Nation and the Mohegan Tribe, have received their own planning funding under Phase 1 to develop regional PCAPs and CCAPs. The MSA plans are led by the Council of Governments (COGs):

- **WestCOG & MetroCOG:** [Bridgeport-Stamford-Norwalk MSA Website](#)
- **SCRCOG & NVCOG:** [New Haven-Milford MSA Website](#)
- **CRCOG & RiverCOG:** [Hartford-East Hartford-Middletown MSA Website](#)

See this map

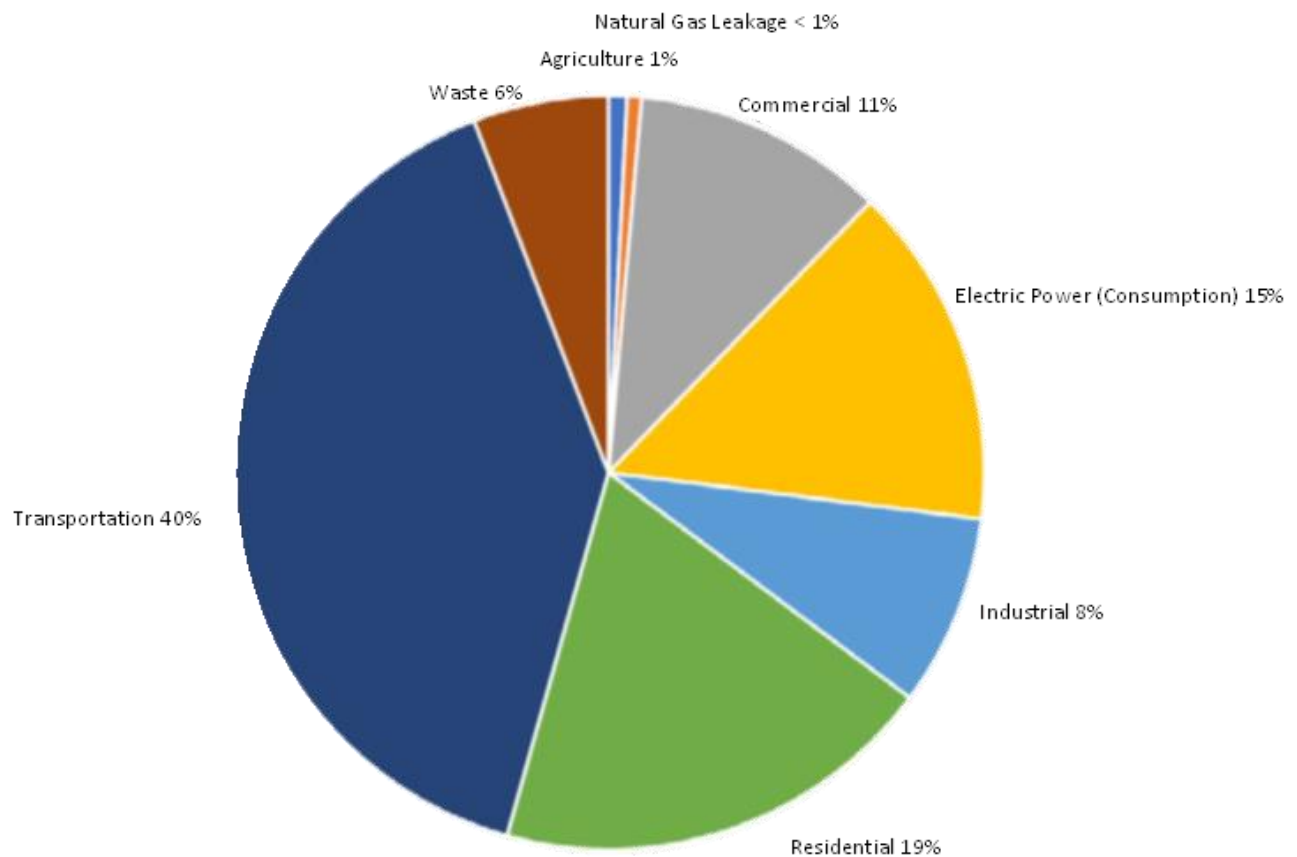
(<https://experience.arcgis.com/experience/398bf303dde74cb79a48235cbfad5784/page/CAP-Map/>) for the MSA regional planning areas in the state. Map attached below.

V. A Review of Connecticut’s Sources of Greenhouse Gas Emissions

Connecticut’s PCAP implementation-ready greenhouse gas reduction actions are intended to address its sources of GHG emissions. Below is a summary of the findings of DEEP’s latest [GHG Emissions Inventory](#), which is released annually by DEEP, that shows the significant sources of emissions in the state. This inventory will be part of the state’s PCAP and it informed the selection of the implementation-ready actions. The plot below shows the relative percentage of GHG emissions by sector for the year 2019 with transportation, commercial and residential buildings, and the electric sector representing the largest sources of emissions in the state.



Compared to past inventories, the 2019 inventory showed that transportation remains the top emitter in the state and has not decreased significantly from 1990 levels; residential heating replaced the electric sector as the second-largest emitter in the state; and electric-sector emissions continue to decrease. While Connecticut met its initial goal for 2020 emissions set by Connecticut statutes, further sharp reductions are needed to meet the medium- and longer-term goals of 45% reduction in emissions below 2001 levels by 2030 and an 80% reduction below 2001 by 2050.



Source: [1990-2021 Connecticut Greenhouse Gas Emissions Inventory](#)

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