



STATE OF CONNECTICUT

OFFICE OF POLICY AND MANAGEMENT

Comprehensive Planning and Intergovernmental Policy Division

April 6, 2018

Members of the Continuing Legislative Committee on
State Planning and Development:

The Honorable Steve Cassano
The Honorable George Logan
The Honorable Roland Lemar
The Honorable Catherine Osten
The Honorable Cristin McCarthy-Vahey
The Honorable Jason Rojas
The Honorable Chris Soto

Re: Revised Draft Conservation and Development Policies: The Plan for Connecticut, 2018-2023

Dear Senators and Representatives:

In accordance with Section 16a-29 of the Connecticut General Statutes (CGS), the Office of Policy and Management (OPM) hereby submits the revised Draft *Conservation and Development Policies: The Plan for Connecticut, 2018-2023* (Draft C&D Plan) to the Continuing Legislative Committee on State Planning and Development (Continuing Committee) "for its approval, revision or disapproval, in whole or in part."

OPM acknowledges that this delayed submittal of the Draft C&D Plan poses a challenge not only to the Continuing Committee, which must hold a public hearing and issue its recommendation for approval or disapproval to the General Assembly under CGS Section 16a-30, but also to the public who will be faced with a more compressed time period for preparing public hearing testimony. OPM will be publishing responses to public comments on its website in the coming days.

Fortunately, the revisions presented in this Draft C&D Plan are more incremental in nature, compared to the comprehensive overhaul of the 2013-2018 C&D Plan. OPM has updated several state agency policies, in response to public comments, and the following items represent two areas that received significant interest:

1. CGS Section 16a-27(h) provides a new requirement that the Draft C&D Plan consider the "risks associated with increased coastal flooding and erosion..., identify the impacts of such increased flooding and erosion on infrastructure and natural resources, and make recommendations for the siting of future infrastructure and property development to minimize the use of areas prone to such flooding and erosion." Policies 4.15, 5.5, and 5.6 of the Draft C&D Plan, in conjunction with Policy 1.1, collectively address these new requirements.

Please note that Section 5 of Senate Bill No. 7 seeks to modify CGS Section 16a-27(h) by referencing Long Island Sound sea level change projections issued by the Marine Sciences Division of the University of Connecticut (UConn), in lieu of global projections issued by the National Oceanic and Atmospheric Administration (NOAA). If this legislation passes, OPM, in consultation with UConn and

the Department of Energy and Environmental Protection (DEEP), will subsequently provide the Continuing Committee with recommendations for integrating Long Island Sound sea level change projections with the State C&D Plan and accompanying Locational Guide Map.

2. The Locational Guide Map is a component of the Draft C&D Plan that delineates the boundaries of priority funding areas, as required by CGS Section 16a-35c(b). OPM recommends a modified approach to delineating priority funding areas by raising the threshold for Census Blocks to contain *two* or more criteria, versus the current methodology that requires only a single criterion.

Public comments favoring this new approach generally indicated that the US Census Bureau's Urban Area/Urban Cluster classification can be misleading when it is the sole criterion for delineating a priority funding area, since that classification sometimes includes areas where towns do not desire growth or where they lack the type of infrastructure necessary to support state agency investments in growth-related projects. In such instances, state agencies would be required to consult the affected municipality's plan of conservation and development in complying with CGS Section 16a-35d.

For procedural purposes, OPM also recommends a new requirement that sponsoring agencies communicate with appropriate "resource consultation agencies" before undertaking growth-related projects in balanced priority funding areas. This is intended to ensure that any potential policy conflicts or permitting issues are addressed at the earliest stage among appropriate agencies.

The proposed 2018-2023 Locational Guide Map is available as a downloadable PDF and as an interactive web-based application on OPM's website: www.ct.gov/opm/cdplan. OPM acknowledges that there are inherent imperfections with statewide mapping, based on a set of limited geospatial criteria, and is able to accept and integrate new data as it becomes available.

In addition to preparing these statutorily-required revisions to the Draft C&D Plan, OPM is also responsible for reporting on its implementation. OPM's *2018 Report on the Implementation of the Conservation and Development Policies: The Plan for Connecticut (2013-2018)*, has been submitted simultaneously with this revised Draft C&D Plan. That report summarizes current challenges with its implementation, and includes a potential remedy for more effective and consistent implementation by state agencies.

OPM would like to especially recognize the important contributions from all Councils of Governments (COGs) in coordinating the many workshops and public hearings on behalf of their member municipalities throughout the Draft C&D Plan revision process.

My staff and I look forward to working with the Continuing Committee to address any remaining issues that members might have, and to assist with addressing any comments received at the Committee's public hearing.

If you would like to discuss the Draft C&D Plan or have OPM staff prepare a presentation prior to the Continuing Committee's public hearing, please contact Dan Morley at (860) 418-6343 or Daniel.Morley@ct.gov.

Sincerely,



David A. Kalafa
Undersecretary