



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

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Re: Conservation and Development Policies Plan 2025-2030

The Council on Environmental Quality (Council) provides the following comments regarding the state's Draft Conservation and Development Policies Plan 2025-2030 (C&D Plan).

In August 2023, the Council submitted comments suggesting that climate change mitigation and adaption should be a focus of the C&D Plan and that “it would be appropriate to consider the policies and priorities identified as “near term actions” from the Governor’s Council on Climate Change (GC3) Phase I report¹”. The C&D Plan identifies Targets, primarily within the Stewardship of Resources Vision² Area, that specifically address climate change mitigation and adaption, and protection and enhancement of environmental resources. The Council strongly supports those targets. Further, the C&D Plan encourages “potential partners and stakeholders to consider impacts and opportunities of actions across multiple vision areas”, which should foster a more holistic approach. The Council suggests that an explicit overarching policy be added to the Policies² section of the C&D Plan to emphasize the importance of climate change adaption and mitigation and protection and enhancement of environmental resources, including water. In addition, the Council suggests that agencies also be encouraged to assess the impact of a proposed action towards 1) climate change adaption and mitigation with a goal to reduce greenhouse gas (GHG) emissions, and 2) source reduction and recycling of solid waste as Implementation Measures².

Since the C&D Plan is the state’s “comprehensive strategies plan for land and water resource conservation and development”, the Council suggests that water resource protection, and especially source water protection for drinking water, be more prominent in the Policies and Implementation Measures of the C&D Plan. The Council supports the intent of the target in the Stewardship of Resources Vision Area that would result in “restoring, enhancing, and protecting natural assets to improve water quality” and suggests that the statement also be included as an Implementation Measure. The Council also suggests the addition of explicit Targets that encourage approaches based on nature-based solutions and promote land use controls that would protect watershed lands, prime farmland, and core forests.

With regards to the chart on pages 35 and 36, the Council suggests that more vision statements could be applicable to the identified Implementation Measures, including but not limited to:

¹ Governor’s Council on Climate Change, Taking Action on Climate Change and Building a More Resilient Connecticut for All, recommendation 14; https://portal.ct.gov/-/media/DEEP/climatechange/GC3/GC3_PhaseI_Report_Jan2021.pdf

- Avoid developing prime farmland soils, wetlands, habitat areas, and core forest; Improve the climate resilience of existing public infrastructure, and avoid siting new infrastructure in areas prone to flooding and inundation from sea level rise and/or storms; Invest in strategic open space conservation and management that meaningfully contributes to the state's open space goals, ecosystem health and/or climate change adaptation that could also apply to “Healthy People and Places”; and
- Foster bike, pedestrian and micro-mobility connections between residential, commercial and mixed-use development and existing or planned transit; Promote infill, redevelopment and revitalization of environmental justice communities and other neighborhoods that have suffered from prolonged disinvestment; and Provide equitable access to natural resources and recreation opportunities and support environmental literacy that could also apply to “Stewardship of Resources”.

Lastly, the C&D Plan seeks to “amend CGS 16a-31 to increase the value threshold of projects that need to be consistent with the C&D Plan from \$200,000 to \$1,000,000 while also requiring that agencies document and transmit to ORG their determination of the consistency of each such action with the C&D Plan’s Implementation Measures, in a manner to be developed by ORG in consultation with other state agencies.” The Council supports the provision for state agencies to document their determination of consistency with the C&D Plan’s Implementation Measures, but questions why the value threshold of state actions would increase from \$200,000 to \$1,000,000. Adjusted for inflation, \$200,000 in 2007 would be equivalent to approximately \$300,000 today. Increasing the proposed value threshold of projects to account for inflation would be appropriate and would still “facilitate the transition to more transparent implementation of the C&D Plan”; however, increasing the value threshold too much would eliminate consistency reviews for impactful projects within the “four broad categories” identified in the Connecticut General Statutes (CGS).

In summary, the Council strongly supports the Targets in the Stewardship of Resources Vision Area and the Implementation Measures addressing the environment. The Council suggests that protection and enhancement of environmental resources, including reduction of GHG emissions and climate change adaption and mitigation, be explicitly included as an overarching policy in the Policies section that would apply to all agency planning, programming, and policymaking; that Implementation Measure(s), which guide agency actions, be added/revised to address climate change, reduction of GHG emissions, source reduction and recycling, and protection of water resources; that more vision areas be identified as applicable for some of the Implementation Measures; and that the C&D Plan identify a more appropriate value threshold for consistency reviews for certain state agency actions.

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

Sincerely,



Paul Aresta,
Executive Director

² “Visions” identify priorities for the 2025-2030 planning period to be considered holistically; “Policies” guide agency plans and programs; and “Measures” are used to guide agency actions.