



July 31, 2015

Commissioner Robert Klee
Governor's Council on Climate Change
C/O Department of Energy and Environmental Protection
79 Elm Street,
Hartford, CT 06106-5127

Dear Commissioner Klee and Members of the Governor's Council,

Clean Water Action is a forty-year-old national advocacy organization at the forefront of natural resource protection and climate action. Our Connecticut program was actively involved in crafting, and advocating for, the original Global Warming Solutions Act. We have worked in close partnership with the Clean Energy Communities Program to help Connecticut's cities towns and villages reduce their carbon footprints while revitalizing their local economies.

We applaud the formation of the Governor's Council on Climate Change. We appreciate this opportunity to provide recommendations for the success of this critical initiative and welcome the opportunity to be helpful to the Council going forward. While Connecticut's original policy framework was valuable in reducing greenhouse gas emissions (GHG) in keeping with Phase 1 goals, we believe that the challenges of reaching 2050 goals -- and interim targets along the way-- will require fresh thinking, ambitious action, and a new level of leadership.

1. Emissions reduction and clean energy

Connecticut has made admirable strides in clean energy, especially where residential solar is concerned. Residential renewable energy is great, but large institutional installations will also be needed to achieve the necessary scale. Just as they were mobilized to support the Solar Home Renewable Energy Credit, the political influence of the Governor's office and DEEP should be brought to bear to break through on enabling legislation for shared renewables, as well as an improved and unrestricted Virtual Net Metering program. Together, these programs will expand access to solar and other renewable energy sources for Connecticut's homes and businesses, while creating a more robust opportunity for clean energy developers. To bring them fully to life, state energy policy will need to shift further toward incentivizing distributed renewables, and negotiating a framework for establishing a "value of solar" that is accepted by the utilities and other stakeholders. In light of the anticipated end of the federal tax credit for solar installations at the end of 2016, these efforts should be given the highest priority. In addition:

- Connecticut, through DEEP, should make every effort to establish a more proactive clean energy siting policy with meaningful stakeholder inputs, working with trusted local leaders in identifying viable sites and creating expedited permitting processes where appropriate. This will create the most attractive possible playing field for clean energy developers while preserving local control in energy siting issues.
- Connecticut should continue and expand its micro-grid program, providing technical assistance as well as funding. The program should reach out actively to communities and should seek expanded investment dollars in a manner similar to the Green Bank’s leveraging strategies.
- As energy storage technologies advance and integration with renewable energy systems provide exciting opportunities for local energy self-reliance, the state should push on better incentives for storage.
- When Plans of Conservation and Development are updated, the state should require planning for local energy security through resilient design and procurement from clean sources.

2. Adaptation.

We very much appreciate the maturing work of CIRCA, UConn’s development of green infrastructure tools and training for a broad audience, and the justifiably popular Adaptation Academy program. The need now is to build momentum for more concerted action in all Connecticut’s communities, not only to be prepared for storms and floods, but to withstand heat waves and maintain public safety in the aftermath of climate related crises.

Adaptation is a necessity for major infrastructure, and every bit as important for households, neighborhoods, and commercial districts. We expect that state policy will rise to the first of these challenges, and hope that sound adaptation planning will be required of all local applicants for state funding. We believe the second of these challenges is greater and worth addressing creatively. That is, Connecticut needs a strategy for engaging and supporting small scale, widely decentralized adaptation projects in the spirit of Kansas City’s “10,000 Rain Gardens” program or San Francisco’s “Park-lets.” Approaches like these can make our communities more livable while fostering wider participation.

The State should require attention to climate change impacts and resiliency in Plans of Conservation and Development when they are renewed. They are the best existing mechanism for integrating state goals with local plans. This requirement should include specific, ambitious goals and standards in terms of land use, water conservation, stormwater management, and infrastructure. To ensure that local plans are fully implemented, the state should define and concretely support “Community Resiliency Councils” that bring together the interests and expertise of public works, land use planning, clean energy, planning and zoning and other relevant technical disciplines for coordinated planning and program development at the local



level. These could certainly build on the local Clean Energy Task Forces which have made significant contributions in local energy planning. Vermont’s “Community Resilience Organizations” also provide a useful model to consult.

State policies must be strengthened to support and drive local innovation – for example, we need incentive pricing for water conservation, and this could be tied with grassroots water-efficiency outreach campaigns that are similar in structure to Connecticut’s signature clean energy outreach programs. Connecticut should ensure that planners and building code officials are educated in the changing requirements for the protection of buildings and infrastructure from climate risks in light of shifting rainfall and temperature patterns – for example, required storm drain dimensions and the needs and opportunities for passive cooling in buildings and public spaces. The state should require upgrades in local building codes to address these, and use this as an avenue for introducing visionary approaches to resilient design.

Beyond setting standards, Connecticut can lead by recognizing the critical role of a well prepared work force in adaptation-related fields such as construction and public works, one that can stay current with the best practices of climate change adaptation as they evolve. The state should create cutting-edge, interdisciplinary professional development programs in its university system for engineers, architects, landscape architects, construction and public works professionals to build an understanding of the principles and practices of resilient design (drawing from examples in California, New York and elsewhere). In light of the critical role of clean and safe water supply, water-efficient and water-restoring technologies should be understood as a priority industry cluster for Connecticut’s economic development.

3. Public Health

Climate change is increasingly recognized as one of the most significant public health issues of our time, causing a rise in vector borne diseases, including lyme disease, increased incidence of asthma and other respiratory ailments due to ozone and particulate air pollution, rising cardiac related illnesses and death due to extreme heat events and poor air quality and psychological stress and exacerbations of other mental health conditions. A recent report by the American Psychological Association identified significant mental health impacts of climate-related disasters and ongoing stresses associated with climate change.

Connecticut residents, whether they live on the shore, in rural farmlands or in urban environments, are already experiencing health effects of a changing climate and this will continue and get worse. The elderly, those with pre-existing medical conditions and young children are particularly vulnerable and people in low income communities are disproportionately affected. The impacts of a changing climate will not only affect public health, it will significantly increase healthcare costs with increased emergency room visits, hospitalizations and lost work days.



Public health professionals should be fully engaged in policy development as well as adaptation and resiliency initiatives at the local and state level if we are to have a comprehensive and proactive approach to sustainable communities and a healthier society.

4. Resiliency, Revitalization, and Governance

Resiliency is a feature of systems, not isolated elements. Resilient shorelines and floodplains are important. But just as important are communities that understand the implications of climate change and can work together to preserve livability while also responding when crises occur.

Research confirms that the communities responding best to disaster and crisis are those with diverse stakeholders involved in leadership and learning. Connecticut's next-generation climate change response must be integrated and must transcend government's ordinary role by engaging citizens, business and institutions as full partners. We believe that a public-private partnership model like Sustainable Jersey could work well in Connecticut. In many cities, towns and villages, the elements of this model are emerging from current community-based work in clean energy and revitalization. By working with these existing stakeholders and leveraging their efforts, Connecticut can greatly accelerate its work in climate change mitigation and adaptation, unleashing the creativity of citizens to preserve and restore livable communities, protect public health and assure that we maintain the beautiful natural resources that are the hallmarks of our state. We appreciate the opportunity to comment and hope that you will consider us your partner as you move forward with this most critical work.

Sincerely,

A handwritten signature in black ink that reads "Anne B. Hulick".

Anne Hulick, State Director

Susan Eastwood, Communications Manager

Melissa Everett, Energy Program Manager