

SOUTHEASTERN CONNECTICUT COUNCIL OF GOVERNMENTS

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March 21, 2024

Commissioner Katie S. Dykes
Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106

Re: Letter of Support for the State of Connecticut Individual Application – CPRG Implementation

Dear Commissioner Dykes,

On behalf of the Southeastern Connecticut Council of Governments (SCCOG), I am submitting this letter of commitment for the Connecticut Department of Energy and Environmental Protection's (CT DEEP) individual application requesting federal funding from the EPA Climate Pollution Reduction Grant Phase II Implementation Grant (EPA-R-OAR-CPRGI-23-07) for additional funding and incentives to implement the critical implementation-ready climate action measures in the sectors of transportation, buildings, and waste identified in Connecticut's Priority Climate Action Plan (PCAP) of: a medium and heavy-duty vehicles incentive program; replacing diesel-powered idling truck mounted attenuators used in state transportation construction work with solar and battery-powered ZeroRPM® systems; expanding the state's program to remove health and safety barriers for energy efficiency improvements in residential homes and the energy efficiency program; enforcing compliance with Connecticut's Commercial Organics Recycling Law; and funding food waste diversion programs and composting infrastructure for municipalities in the state.

SCCOG is a public agency with representatives from twenty-two towns, cities, and boroughs, formed to provide a basis for intergovernmental cooperation in dealing with a wide range of issues. Duties assigned to SCCOG include establishing a plan of conservation and development for the region. SCCOG undertakes numerous studies and initiatives each year, under the guidance of member municipalities. Building on our foundation as a regional planning entity, our support for this project will allow CT DEEP to more effectively implement the greenhouse gas reduction measures furthered by the State's CPRG Implementation Grant through our municipal engagement efforts and alignment of the proposed GHG reduction measures with municipal activities.

This letter includes SCCOG's commitment to continuing to coordinate and engage with the state on the development and implementation of the greenhouse gas reduction measures identified in the state's PCAP as we have done since the CPRG planning grants were awarded in summer 2022. We commit to coordinate and engage on CPRG implementation in the following ways:

- Respond to any CT DEEP Requests for Information that will inform the community engagement strategy associated with CPRG implementation, including the development of Request for Proposals for participant support costs program for community engagement.
- Attend one or more DEEP-led public meetings per year related to the implementation-ready climate action measures that may include:
 - Providing input on the design, performance measures, and resources required for DEEP

Member Municipalities:

Bozrah * Colchester * East Lyme * Franklin * Griswold * Borough of Jewett City * City of Groton * Town of Groton * Lebanon * Ledyard * Lisbon * Montville * New London * North Stonington * Norwich * Preston * Salem * Sprague * Stonington * Stonington Borough * Waterford * Windham

and partners to implement the measures; and

- Providing feedback to DEEP with ideas, contacts, and engagement to help meet Justice 40 and other environmental justice goals for measure implementation.
- Coordinate on the implementation of the CPRG grants to ensure that no CPRG funding will fund the same measure in the same location through the safeguards outlined here:

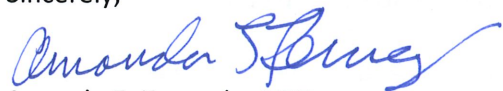
Safeguards for State individual application and COG/MSA CPRG coalition application. There is one area of potential overlap between the solar and storage coalition application for municipally owned affordable housing of which we are a part and the DEEP individual application for CPRG funding measure of an expansion of the existing Residential Energy Preparation Services (REPS) Program, which removes health and safety barriers to participation in the State's energy efficiency programs. The solar and storage coalition proposal includes roof repair and replacement as a likely necessary cost of installing the solar on the housing buildings. Roof repair is an eligible activity under the State REPS program as well. As a safeguard, SCCOG in coordination with DEEP will ensure that no CPRG funding from REPS will be used to do roof repair or replacement on any of the municipally owned affordable housing locations funded by the solar and storage coalition application being led by the Capitol Region Council of Governments. We understand there is an existing paper trail that DEEP uses to know which exact locations are being referred to the REPS program through the State's weatherization and energy efficiency programs before REPS program funds are used. The solar and storage coalition application has pre-identified the locations of the municipally owned affordable housing that will be eligible for the solar and storage program. The coalition application is partnering with the Connecticut Green Bank, which is a quasi-public agency of the State of Connecticut. DEEP sits on the CT Green Bank's governing board. DEEP and the Green Bank regularly partner on clean energy projects and have a detailed understanding of each other's processes, further ensuring a seamless coordination between these two CPRG applications.

SCCOG strongly supports DEEP's application for additional funding and incentives to implement the critical implementation-ready climate action measures in the state's individual application. Our member municipalities frequently contend with issues tied to the proposed grant activities. For example, member municipalities recently formed a subcommittee to study the issue of regional solid waste management; and similarly, through our role as a designated Metropolitan Planning Organization, we coordinate with the CT Department of Transportation to track and attempt to mitigate GHG and co-pollutant emissions from transportation.

We are confident that DEEP's plan and implementation strategy for the proposed actions will achieve the grant program's goals of "achieving significant cumulative GHG reductions by 2030 and beyond," "achieving substantial community benefits, including the reduction of criteria air pollutants and hazardous air pollutants," "complementing other funding sources to maximize greenhouse gas emissions and community benefits," and "pursuing innovative policies and programs that are replicable and can be "scaled up" across multiple jurisdictions."

If you have any questions about our strong commitment to this effort, please contact me via email at akennedy@seccog.org or by phone at 860-889-2324 x 110.

Sincerely,



Amanda E. Kennedy, AICP
Executive Director