

CONNECTICUT  
Land Conservation Council

May 1, 2024

Sent via email: [DEEP.20by26@ct.gov](mailto:DEEP.20by26@ct.gov)

Commissioner Katie Dykes

Connecticut Department of Energy & Environmental Protection

79 Elm Street

Hartford, CT 06106

Re: Comments on DEEP 20BY26 Initiative

Dear Commissioner Dykes,

I am pleased to submit comments on DEEP's 20BY26 Initiative on behalf of the Connecticut Land Conservation Council.

CLCC is the statewide umbrella organization for the land conservation community, including Connecticut's ~120 land trusts. Our mission is to elevate and strengthen land conservation in Connecticut, envisioning a future where every community is supported and sustained by a diverse mix of conserved land, with land conservation embraced as an essential community value.

Critical to our mission is CLCC's strong partnership with DEEP's staff—seeking opportunities to assist the state in achieving its open space goals, including working with the agency to increase the efficiency and efficacy of the Open Space and Watershed Land Acquisition (OSWA) and Urban Green and Community Garden (UGCG) grant programs. Other CLCC priorities include fostering enhanced intra- and inter-agency cooperation on land use programs and policies, advancing the vital role of nature-based solutions in mitigating the escalating effects of the inter-related crises of climate change and biodiversity loss, and ensuring that everyone everywhere has access to the benefits of nature.

Consistent with CLCC's mission and the preceding priorities, we offer the following comments on the 20BY26 strategic goals for your consideration:

**Streamline of Permitting Timeframes (Goals 2 and 3):** While we support efforts to streamline agency actions, we reiterate our 20By20 comment that proposals to streamline the agency's permitting process need to be evaluated first and foremost by whether the changes would compromise environmental protections and the opportunity for public participation.

**Enforcement, Implementation, and Environmental Justice (Goals 4, 7, and 8):** We fully support DEEP's continuing commitment to ensuring consistency across the agency's enforcement programs and enhancing this commitment through the inclusion of equity and environmental justice in its decision-making, evaluation, implementation, and public participation related to its



regulatory programs. To fulfill this goal, DEEP must continue to have the support it needs to add and retain the staff necessary to meet these commitments and responsibilities.

**Expansion of Tools for Online Services (Goal 10):** Building on the agency’s success in launching the self-serve Natural Diversity Database (NDDDB) portal and recognizing the plethora of mapping, roadmaps, and other tools now available at the state and federal level to assist in identifying and prioritizing areas for climate resilience, biodiversity protection, land conservation, and other nature-based solutions, we urge the agency to consider how this goal may be expanded and organized to make these resources available and accessible to the public.

**Continuing to Increase Grant and Contracting Processes for Key Grant Programs (Goal 11):** CLCC is especially excited about this goal, particularly as it relates to opportunities to continue improving the efficacy and efficiency of the OSWA and the UGCG grant programs and otherwise working with DEEP staff to strengthen land conservation and prioritize other nature-based solutions throughout the state. Working with the Natural Heritage, Open Space and Watershed Land Acquisition Review Board, some of these recommendations have already been implemented through 2023 statutory amendments; others are currently under consideration by the General Assembly, and the agency may accomplish others through administrative changes. Recommendations include outsourcing elements of the grant program, streamlining the Attorney General review, and allowing more flexibility in the UGCG matching fund and reimbursement process. (See Recommended Goal 18)

**DEEP Concierge Services (Goal 12):** CLCC is supportive of the goal to expand concierge services to municipalities and small businesses to help them “better navigate DEEP’s systems, plan projects, receive status updates, and resolve issues.” We ask that this important service also be extended to NGOs. (See Recommended Goal 17)

**Strengthening Communication and Collaboration (Goal 13):** CLCC commends the agency on its improved communications and enhanced efforts to collaborate with stakeholders in land conservation. We fully support this goal and urge DEEP to consider formalizing partnerships to better promote and engage the public with the agency’s programs and opportunities. (See Recommended Goal 18)

**Permitting for Decarbonization (Goal 14):** CLCC is pleased to see the creation of a renewable energy siting mapping tool to help identify suitable renewable project siting areas that avoid or minimize negative impacts. Building off of that effort, we contend that this Goal be further refined and specifically include additional approaches and best practices for siting of renewable and non-renewable energy infrastructure to avoid loss of forests, farmland, and other sensitive lands and encourage developers to site their projects on brownfields, rooftops, parking lots and other developed spaces. (See GC3 Phase I Report, Recommendation 25, Page 37)

**Tools for Navigating Available Federal and State Funding (Goal 15):** CLCC supports the creation of tools, such as a grants dashboard, to assist the public in accessing incentives, grants, and other offerings related to energy programs. We ask that the agency expand this goal to include funding and programming that supports nature-based solutions, including the

conservation of natural and working lands, wetlands, healthy soils, riparian buffers, etc. This expansion is especially essential with the availability of significant federal funding.

**Public-Private Partnerships in State Parks (Goal 16):** While CLCC is supportive of this goal in concept, as we stated in our comments regarding the Partnerships in Parks Initiative (2/16/24), we emphasize the importance of a thorough and transparent review process for any changes or expansions of use proposed for state parks and other public lands through the Initiative to ensure that activities align with the intended use of these lands and are compatible with the natural environment. This process should include ample notice and opportunities for public comment to ensure community voices are heard and valued, like the CEPA review process for large projects (including notice in the Monitor, scoping process, and EIE).

### **CLCC Recommendations for Additional Goals**

#### **Goal 17: Strengthen Inter-Agency Communications and Cooperation**

Building off of the excellent conversation amongst Commissioner Dykes and other commissioners and state leaders at [CLCC's 2024 Winter Summit on Land Use in CT](#), we recommend that DEEP strengthen its communications and cooperation with sister agencies to incentivize collaborative opportunities for multiple uses of land, including natural lands conservation, affordable housing, brownfields redevelopment, and farmland access. Examples of recommendations from the Summit include:

- Expanding DEEP's concierge service to allow for intra- and inter-agency review of land use proposals with a shared agency coordinator (e.g., a "Land Czar").
- Creating a grant portal that allows applicants to review state and federal grant opportunities to support multiple uses of the property (e.g., land conservation and affordable housing) and the ability to submit one master proposal for, at a minimum, a preliminary review by the relevant state agencies.

#### **Goal 18: Utilize Public-Private Partnerships to Enhance Program Efficiencies**

We recommend the agency seek opportunities to contract with nonprofits and other third parties to further DEEP priority programs and administration. The administrative costs saved by the agency when working with private contractors for specific functions (i.e., no health care, overhead, retirement, and other expenses) would increase efficiencies and allow DEEP to allocate additional resources to the grant programs. Public-private partnership models may be extended to elements of DEEP's OSWA program to make it more efficient and enable the program to return to two grant rounds per year.

#### **Goal 19: Prioritize the Completion of the Public Use and Benefit Land Registry**

Building more specifically on Goal 10, we recommend that DEEP prioritize the completion of the Public Use and Benefit Land Registry—a publicly accessible geographic information map system and database developed under C.G.S Section 23-8(e). With additional resources now dedicated to this statutorily mandated land registry project, which is intended to help drive land conservation efforts across the state, we recommend creating a specific Goal to create a system

that allows municipalities, Councils of Governments, and land trusts to upload their land ownership information into the registry and establish a uniform Cadastral parcel database.

**Goal 20: Prioritize the Inclusion of Nature-Based Solutions**

To support DEEP Strategic Goals 1 and 2, we recommend that the 20BY26 Initiative include a goal that recognizes nature-based solutions as a priority for integration in the state’s planning and policies that support climate change mitigation and adaptation, increase biodiversity, support our quality of life, stewardship responsibilities, and long-term economic competitiveness.

Thank you again for this opportunity to provide these initial comments regarding the 20BY26 Initiative. We look forward to continuing conversations and participating in the process.

Sincerely,



Amy Blaymore Paterson, Executive Director