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Connecticut Department of Energy & Environmental Protection
Office of Climate Planning
79 Elm Street
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Via email: deep.climatechange@ct.gov

On behalf of Sierra Club's more than 40,000 members and supporters in Connecticut, thank you for providing this opportunity to comment on the Governor's Council on Climate Change (GC3) Working Group Draft Reports.

The consensus of climate scientists is that urgent action must be taken by 2030 to avoid the worst impacts of climate change. Connecticut statute mandates a 45% reduction in greenhouse gas emissions from 2001 levels by 2030 and an 80% reduction by 2050. Business as usual is not an option. Neither is incremental change. Connecticut needs to take bold and urgent action to achieve these reductions and do our part to ensure a livable planet for future generations.

We want to thank Governor Lamont for reconvening the GC3 through Executive Order 3, and applaud the emphasis on centering equity and environmental justice. As you revise the individual work group drafts and pull them together into a cohesive and actionable plan, Sierra Club Connecticut offers the following comments for the report as a whole and on individual recommendations in the work group draft reports.

Sierra Club urges the addition of two recommendations:

Set a goal of 100% zero-emission electricity, transportation and buildings that centers distributed equity and creates good jobs (GC3 Mitigation Work Group). This recommendation would tie together the various sectors and set a clear and bold direction for the state. Connecticut would join with other states and cities that have committed to a just and equitable transition to clean and renewable energy.

Distributed equity, as noted in the Equity & Environmental Justice Draft Report, is defined as "Placing the most vulnerable communities at the forefront of any potential benefits a policy might create; ensuring that the distribution of the benefits and burdens of climate change mitigation and adaptation are equitably distributed." We suggest that at least 40% of Connecticut investment in clean and renewable energy and the jobs associated with those investments benefit vulnerable communities including low-income communities, Black,

Indigenous and people of color (BIPOC) communities, people with disabilities and low-income populations in rural Connecticut.

The workforce employed to achieve this goal must have access to labor protections and the recommendation should be explicit about it. All construction and related contracts should include requirements for Davis Bacon prevailing wages, project labor agreements, a neutrality policy on collective bargaining, and use of registered apprenticeship programs; in addition to preferences for local hire, community-based businesses, and worker cooperatives.

Suspend any further approvals for the 650 MW fossil gas power plant yet to be constructed in Killingly (GC3 Mitigation Work Group Electricity Committee). Connecticut has produced more electricity than it needs since 2009. The excess power is sent to other states.¹ And, over the last 10 years fossil gas generation has more than doubled. In the face of the climate crisis, building Killingly is a disastrous mistake. With Governor Lamont's goal of zero carbon electricity by 2040, a brand new fossil power plant in Killingly makes no sense. None of the draft GC3 reports address this issue; the GC3 should make a recommendation to stop this unnecessary and destructive dirty power plant from moving forward.

Furthermore, Sierra Club Connecticut strongly supports and recommends prioritizing the following recommendations in the draft reports:

Develop a strategic plan for transitioning from fossil fuels to renewable thermal technology. (*Mitigation Work Group - Buildings Report page 20*) Sierra Club supports this planning to create an orderly, just and equitable transition from fossil fuels to zero emission all-electric heat pumps. It should be noted that we have grave concerns about strategies centered around so-called "renewable natural gas" and other fossil gas alternatives, which lack the demonstrated emissions, availability, and cost benefits of electric heat pumps. Other states have also recognized the need to do this transition planning including California and New York, and California has recognized the insufficiency of biogas as a long-term solution to the state's climate goals.

Set end dates for expansion of the gas grid and new gas installations on the existing grid. (*Mitigation Work Group - Buildings Report page 22*) In order to meet our climate goals we must decrease the use of fossil fuels, yet state policy actively promotes the expansion of gas. Utilities have and continue to push these policies so they can profit off the destruction of the planet. Sierra Club supports this recommendation and urges that gas expansion policies should end immediately, and Connecticut should plan to fully transition off fossil gas by 2050 or sooner with interim targets that align with the GWSA.

Improve the ability of efficiency programs to overcome health, safety, and legal barriers (*Mitigation Work Group - Buildings Report page 7, Public Health and Safety Working Group page 24, Infrastructure and Land Use Adaptation Working Group page 17*) We recommend²

¹ U.S. EIA, Connecticut Electricity Profile, 2018, Table 10, Supply and disposition of electricity, 1990 through 2018

² https://66f28e57-02e8-44f5-8613-feb302092242.usfiles.com/ugd/66f28e_7cbac376d92142fb918518beac823206.pdf

that DEEP improves the ability to overcome barriers by integrating the various programs for homes, especially low-income programs, into a comprehensive approach through the CL & M Home Energy Solutions and Home Energy Solutions Income-Eligible programs. An integrated, comprehensive program would couple energy efficiency retrofits with removal of health and safety barriers, and replacement of fossil fuel burning equipment and appliances with high efficiency electric alternatives. A comprehensive program that combines energy efficiency and weatherization with these measures will address equity issues while aligning with the climate goals of the state.

Create stretch codes, carbon codes, and all-electric options (*Mitigation Work Group - Buildings Report page 8*). Improving Connecticut's building codes ensure that new buildings, expected to last many decades, are better for the planet and more comfortable, cost-effective, and safer. California's net-zero building code requires all new residential buildings in the state to be net zero by 2020, and all commercial buildings to be net zero by 2030. It is anticipated to reduce energy use by 50% compared to the previous code. Connecticut should move quickly to implement stronger codes to reduce greenhouse gas emissions from buildings.

Strengthen alignment between state decision making and GHG emissions-reduction goals (*Mitigation Work Group - Cross-sector Report page 127*) This goal includes strategies to ensure that regulatory programs and state decision-making take into account their impact on meeting Connecticut's GHG emissions-reduction goals, and that they account for health and social cost impacts, including co-benefits of non-CO2 pollutants. (A modernized cost effectiveness test is also recommended in the *Mitigation Work Group - Buildings Report page 10*). Notably, neighboring New York has enacted the Climate Leadership and Protection Act that includes a provision (Section 7(2)) that requires all state agency decision-making to ensure consistency with the state's climate commitments.

Establish statewide goals for zero-emission medium- and heavy duty trucks and for school transportation (*Mitigation Work Group - Transportation Report page 84*) As a signatory of the multi-state memorandum of understanding committing to truck electrification and eliminating toxic air pollution from medium and heavy-duty trucks and buses by 2050, Connecticut should develop an action plan that emphasizes reducing pollution in overburdened communities and strive for a more ambitious timetable than the MOU's objectives of at least 30 percent of new truck and bus sales to be zero-emission by 2030, and 100 percent zero-emission by 2050.

All proceeds from the state's GHG emissions-reduction vehicle registration fee should be allocated to CHEAPR (*Mitigation Workgroup - Transportation Report page 85*) Currently \$3 million of the \$8.5 million collected through the GHG emissions-reduction vehicle registration fee is directed to the CHEAPR program. Based on data presente <https://www.insureourfuture.us/ct-insurance-reportd> at recent meetings of the newly formed CHEAPR Board, meeting the state's zero-emission vehicle goals under the multi-state ZEV agreement - 125,000 ZEVs by 2030 - will require an increased investment for rebates near equivalent to the \$8.5 million collected by the fee. Sierra Club urges that additional funds from

a full allocation of the GHG fee should be directed to additional incentives for the low income market.

Promote responsible and just materials management (*Mitigation - Non-energy GHG emissions page 67*) Incineration is an unacceptable approach to waste management. We must end incineration and replace it with better solutions like recycling, food waste diversion, composting, and other beneficial waste reduction measures. Sierra Club Connecticut supports the closure of trash incinerators and the adoption of the Zero Waste hierarchy³ and Zero Waste policies to eliminate the need for incineration or landfilling.

We DO NOT support replacing incinerators with gasification or pyrolysis; these are just incinerators in disguise. We urge removing this language from this recommendation.

Sierra Club also recommends caution in how methane from anaerobic digesters to generate electricity is used. Methane produced from anaerobic digesters should not be injected into our inherently leaky gas pipeline system, but instead be located near and used for applications that are difficult to electrify. We urge the work group to provide clarity that methane from anaerobic digestion should not be incorporated into the gas system. (*The Working & Natural Lands Working Group Agriculture/Soils Working Subgroup* - should also note this caution.)

Establish/transform plans of conservation and development as sustainability plans (*Mitigation - Non-energy GHG emissions page 65*) Sierra Club supports this recommendation to align local, regional and state planning to achieve the goals of the GWSA.

Conservation of spaces accessible to Environmental Justice communities. Several reports (*Science and Technology Working Group, Working & Natural Lands Working Group Rivers Sub-Working Group, and Working & Natural Lands Working Group Forest sub group*) highlight the need to protect forests and ecosystem connectivity along waterways, especially the last landscapes that surround urban-suburban riparian corridors. Connecticut should prioritize conservation in our cities, and promote decision making that is rooted in those communities. Remington Woods in Bridgeport is an example of an urban forest that must be preserved.

Finally, Sierra Club Connecticut has concerns about the following areas:

Mitigation Electricity Sector Report must be proactive on the issue of retiring fossil fuel generation. While the narrative of this report outlines Connecticut's fossil fuel generation problems, the recommendations are largely silent on retiring fossil fuel generation. As noted above, recommendations should include stopping Killingly from being built, and retirement of fossil generating facilities should be a top priority particularly the closure of fossil-fueled power plants in vulnerable communities with high rates of asthma.

Mitigation - Non-energy GHG emissions report must be stronger on retiring gas. In its recommendation, the Non-energy GHG emissions work group calls for reduced methane

³ <http://zwia.org/zwih/>

emissions from natural gas distribution. The best way to reduce emissions and meet our climate goals is to retire the gas system and transition to clean, safe and reliable electric heat pumps. We urge the Non-energy GHG workgroup to incorporate two recommendations noted above from the *Mitigation Work Group - Buildings Report* to achieve this: Develop a strategic plan for transitioning from fossil fuels to renewable thermal technology (*page 20*) and Set end dates for expansion of the gas grid and new gas installations on the existing grid (*page 22*).

The **GC3 Financing and Funding Adaptation and Resilience Working Group** report completely ignores the role insurance companies are playing in fueling the climate crisis. Connecticut insurers invest over \$247 billion in fossil fuels and insure untold numbers of fossil fuel projects.⁴ Even more troubling, this working group is making recommendations to allow insurance companies to profit from the very climate crisis they are financing. Those recommendations are: Incentivize Connecticut's Insurance Industry to Promote and Grow the Catastrophe Bond Market and Pilot a Resilience Bond Program (*page 42*); Build Outreach and Capacity and Tracking for the Increased Uptake of Flood Insurance (*page 30*).

We urge the insurance industry to:

- a) Immediately cease insuring new coal projects and coal companies, unless they are engaged in a rapid transition process away from coal to clean energy of no more than two years.
- b) Immediately cease insuring new oil or gas expansion projects.
- c) Commit to phasing out insurance for oil and gas companies in line with a 1.5°C pathway.
- d) Divest all assets from coal companies and oil and gas companies that are not in line with a 1.5°C pathway, including assets managed for third parties.
- e) Bring stewardship activities, membership of trade associations and public positions as a shareholder and corporate citizen more broadly in line with a 1.5°C pathway in a transparent way. This must include forceful advocacy for a green and just recovery from COVID-19.

We also urge that equity be prioritized in all recommendations of this workgroup. At least 40% of all new programs should benefit low-income communities and communities of color that have suffered from decades of intentional structural racism, disinvestment, red lining, discrimination, segregation, and many other injustices.

Thank you for consideration of our comments.

Sincerely,



Samantha Dynowski, State Director
Sierra Club Connecticut

⁴ <https://www.insureourfuture.us/ct-insurance-report>