

To: Policy Board

CC: Matt Hart, Executive Director

Caitlin Palmer, Director of Planning & Regional Development

From: Kyle Shiel, Principal Planner

Date: November 24, 2025

Subject: Endorsement of Comprehensive Climate Action Plan

Intro: At the November 19, 2025 Policy Board meeting, several members raised concerns about portions of the regional [Comprehensive Climate Action Plan](#) (CCAP) and their potential impact on municipalities. Specifically, the recommendation to “*Support an Increase in Solar Projects in the Region, Creating 900 Megawatts Across the Region*” was cited as potentially problematic for some communities where large-scale solar is often proposed on open space or agricultural properties, particularly given the lack of municipal control when the Connecticut Siting Council is involved in such projects.

About the CCAP: It is important to note that nothing in the CCAP should be interpreted as a mandate or requirement for municipalities. The CCAP recognizes that municipalities would often be the primary implementers of any measure proposed in the plan, with local decision makers pursuing projects best suited for their community’s context. The plan states “*Many of the measures highlight a variety of strategies, offering the COGs and municipalities a number of flexible pathways towards reducing emissions.*” (Page 13)

Each of the proposed measures can be implemented through a variety of strategies. Regarding the proposed measure to Increase Solar Projects in the Region, the plan provides several possible approaches, including:

- 1) Expanding deployment of agrivoltaics;
- 2) Exploring community/shared solar projects 100 kW-2 MW in size across the region; and
- 3) Installing renewable energy on municipality-owned property.

For municipalities concerned about the potential loss of open space and agricultural land through the development of large-scale agrivoltaic projects, items #2 and 3 offer other paths towards increasing solar, such as rooftop solar installations on municipally-

owned buildings or encouraging solar canopies on publicly or privately-owned parking lots. *The CCAP was intentionally developed to avoid overly prescriptive measures, recognizing not all projects are appropriate for every community.*

Disbenefits: The CCAP also acknowledges potential drawbacks/disbenefits for each measure, recognizing the importance of community context, financial feasibility and public support. On page 30 of the CCAP, in acknowledgement of similar concerns raised by Policy Board, the plan currently states the following regarding solar projects:

“One prominent disbenefit to the siting of solar is the tension between large scale solar projects siting and preserving prime agricultural land. The Connecticut Siting Council has jurisdiction over the permitting and siting of large solar installations. The siting of large solar installations, particularly in farmland and open space areas, is often controversial. Municipal officials have found that they need to file as an intervenor to participate in the permitting process in any meaningful way. The intervenor process requires financial resources that many small towns lack.”

EPA Program Requirements: Per EPA guidance, CRCOG submitted the CCAP to EPA in late July 2025. In September, EPA notified CRCOG the CCAP met all applicable program requirements and the deliverable was considered satisfied. Significant, formal revisions to the CCAP at this date would not be recommended, as it could potentially jeopardize program compliance.

Proposed Resolution: As cited above, the CCAP as written provides sufficient flexibility for municipalities to choose (or not choose) measures and strategies to reduce emissions. To provide additional clarity regarding local control, the following additional language is proposed for a revised endorsement resolution:

“WHEREAS, CRCOG’s Policy Board affirms each member municipality shall have ultimate discretion whether to pursue and implement any proposed measure in the CCAP and that any endorsement of the CCAP shall not supersede any current or future proposed legislative proposals put forward by CRCOG to the Connecticut General Assembly on behalf of member municipalities;”

Please feel free to contact CRCOG staff if you have additional questions.

Modified Resolution: *New language highlighted below*

Resolution Endorsing the Comprehensive Climate Action Plan (CCAP) for the Hartford-East Hartford-Middletown MSA

WHEREAS, the Inflation Reduction Act of 2022 appropriated \$5 billion to the Climate Pollution Reduction Grants Program (CPRGP), to be administered by the United States Environmental Protection Agency (EPA); and

WHEREAS, on March 1, 2023, EPA announced availability of \$250 million for the first phase of the program, which issued non-competitive planning grants, administered as cooperative agreements, to fund development and expansion of climate action plans (Plans) that will include programs, policies, measures, and projects that will achieve or facilitate the reduction of greenhouse gas (GHG) air pollution; and

WHEREAS, the Capitol Region Council of Governments (CRCOG), in its capacity as the Regional Planning Organization (RPO) for two-thirds of the municipalities within the Hartford MSA, has received \$1 million and entered into a cooperative agreement with EPA; and

WHEREAS, CRCOG in partnership with the Lower Connecticut River Valley Council of Governments and Dewberry have completed a Comprehensive Climate Action Plan (CCAP) for the Hartford-East Hartford-Middletown MSA;

WHEREAS, CRCOG's Policy Board affirms each member municipality shall have ultimate discretion whether to pursue and implement any proposed measure in the CCAP and that any endorsement of the CCAP shall not supersede any current or future proposed legislative proposals put forward to the Connecticut General Assembly on behalf of member municipalities;

NOW THEREFORE BE IT RESOLVED, THAT, the Capitol Region Council of Governments does hereby endorse the Comprehensive Climate Action Plan (CCAP). The plan may be marked Final and dated December 2025, and study recommendations may henceforth be incorporated into CRCOG's planning documents.

CERTIFICATE

I certify the above is a true copy of a resolution adopted by the Policy Board, at its meeting on December 17, 2025.

BY: _____ DATE: _____

Jason Bowsza, Secretary