

To: Policy Board

CC: Matt Hart, Executive Director

Caitlin Palmer, Director of Planning & Regional Development

From: Kyle Shiel, Principal Planner

Date: February 19, 2026

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.

In response to these concerns, CRCOG staff worked with our consultant partners, Dewberry, and interested members of the Policy Board to revise selected sections of the solar measure recommendation to better reflect the consensus of CRCOG municipalities. Below is a summary of the revisions.

Revisions:

- 1) Clarifying that rooftop and parking lot canopy solar should be prioritized over dual-use agrivoltaics on farmland:
 - *Developing community/shared solar projects of various sizes across the region;*
 - *Installing renewable energy on both municipal and commercially-owned property, prioritizing building rooftops and parking lot canopies/carports and de-prioritizing locating renewable energy on agricultural land or land better suited for residential development;*
 - *Expanding deployment of agrivoltaics/dual-use solar in appropriate locations, prioritizing previously disturbed or marginal/non-prime farmland.*
- 2) Incorporating language from CRCOG’s 2026 Legislative Agenda regarding municipal representation on the Connecticut Siting Council:

“CRCOG supports legislation establishing a fair share threshold, inclusive of all solar generation (grid-scale, roof-top, car ports, etc.) for a maximum

megawatt capacity cap per municipality for renewable energy developments. This threshold would set a maximum megawatt capacity per municipality, scaled to factors such as available land area and energy consumption. This cap would promote regional equity in the distribution of renewable energy infrastructure, prevent over-concentration of large-scale facilities in only a few certain towns, and encourage shared responsibility for achieving the state's clean energy goals.

Once a municipality has achieved their fair share threshold, purview over additional renewable energy projects would shift from the Connecticut Siting Council to local review and approval, ensuring that future siting decisions are reflective of both state and local priorities.”

3) **Reiterating municipal concerns regarding the CT Siting Council and large-scale, “utility” solar:**

“A final disbenefit worth noting is the limited municipal control in determining where or whether grid-scale solar energy projects are sited. As noted previously, that authority is vested in the Connecticut Siting Council for any projects over 1MW. In the absence of local control, municipalities have no means of preserving their community's rural character or open space as may be defined through scenic road designations or through local Plans of Conservation and Development. Furthermore, there is currently no meaningful mechanism or clearly-defined process for the Siting Council to consider the cumulative impact of overdevelopment of renewable energy projects in any particular community or region. This oversight effectively penalizes municipalities that have already sited a significant portion of renewable energy projects (with limited to no local input) while unintentionally disincentivizing equitable project siting throughout the state.”

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)

For municipalities concerned about the potential loss of open space and agricultural land through the development of large-scale agrivoltaic projects, alternative 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. After consultation with EPA staff, these revisions would keep the CCAP in compliance with program guidance.

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 endorsement of the CCAP is not a specific endorsement for any municipality of any specific actions contained within; and*

***WHEREAS**, 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;”*

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

Attachment: Link to complete Comprehensive Climate Action Plan (CCAP):

https://crocogct.gov/wp-content/uploads/2025/07/CRCOG-CCAP_FINAL_07302025.pdf

**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 endorsement of the CCAP is not a specific endorsement for any municipality of any specific actions contained within; and

WHEREAS, 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 February 2026, 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 February 26, 2026.

BY: _____ DATE: _____

Rodney Fournier, Secretary