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Martin Mador, Legislative Chair

Commerce Committee
February 25, 2010

Testimony In Opposition to
SB 174 AAC the Standards of Water Quality
HB 5208 AAC Expedited Permitting for Economic Development

I am Martin Mador, 130 Highland Ave., Hamden, CT 06518. I am the volunteer Legislative Chair for the Sierra Club Connecticut Chapter. I hold a Masters of Environmental Management from the Yale School of Forestry and Environmental Studies.

174

SB 174 would require that water quality standards be revised according to Chapter 54, the Uniform Administrative Procedure Act. DEP has an active review process for water quality standards. Proposed revisions have been issued, the public hearing has been held, the comment period is open until March 17. True, DEP has been very tardy in conducting the tri-annual review required by the federal Clean Water Act. I cannot act as apologist for the DEP, but for decades we have had one of the lowest funded state conservation agencies in the country. We are currently at about one third of the national average. This shortcoming will certainly not be fixed this year, or even next, but it is important to understand the efforts this respected agency has made in spite of critically short resources.

Sierra does not see any value in changing horses midstream, nor any compelling rationale for significantly changing the rules. We believe this bill will impact the review currently underway, which is conducted as a result of a federal lawsuit. Ironically, this would simply delay the process even further.

Section 22a-426 provides for an open, public, process for revision of the standards which we feel serves the interests of all stakeholders well. We urge rejection of SB 174.

5208

HB 5208 creates a new model for permitting, driven by an agency, DECD, which has no responsibility for permitting. Sierra believes that a permitting process which is both predictable and reasonably timely is in everyone's best interests. However, to simply accelerate the process without safeguards and sufficient time for a reasonable and complete process is in no one's best interests. We would like to see sufficient state government resources to support permitting process; we have been short for a very long time. However, a solution which simply says that we'll do it quickly whether or not we meet standards would be foolish. It might address short term interests, but the long term damage would be considerable. We all agree that job creation is a top priority in these times of economic crisis. The environment community, acting in concert, has in fact issued a detailed plan for green job creation. But to disregard the long term health of the world we live in would be an abdication of our responsibilities, would throw away decades of investment in keeping our world safe and healthy, and would put short term interests ahead of our obligation to passing on a healthy world to our children.

Sierra is adamantly opposed to this proposal.