



**HOME BUILDERS ASSOCIATION OF CONNECTICUT, INC.**

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Is Our  
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February 14, 2011

To: Senator Steve Cassano, Co-Chairman  
Representative Linda M. Gentile, Co-Chairman  
Members of the Planning and Development Committee

From: Bill Ethier, Chief Executive Officer

Re: **House Bill 5097, AAC Statutory Training Requirements for Inland Wetlands  
Commission Members**

**The HBA of Connecticut is a professional trade association with 1,100 member firms statewide, employing tens of thousands of Connecticut citizens. Our members, all small businesses, are residential and commercial builders, land developers, home improvement contractors, trade contractors, suppliers and those businesses and professionals that provide services to our diverse industry. Our members build 70% to 80% of all new homes and apartments in the state each year.**

**The title of HB 5097 goes to a critical issue that surrounds many of the wetland and watercourse disputes among various advocates today. That is, local inland wetland and watercourse agency (IWWA) members, all volunteers, elected or appointed to their positions, are for the most part:**

- untrained in the law they are charged with implementing,
- untrained in their own regulations or DEP's model regulations,
- uneducated about wetland science, soil science, wildlife and technical issues, and
- inexperienced in development applications or even the basics of understanding the lines and symbols on plans and documentation placed before them.

**Therefore, the one sentence proposal, unfortunately, does not even approach living up to the bill's title. Stating on the record whether the very minimal training requirement under current law has been met is, with all due respect, a meaningless exercise. What the legislature should do is greatly enhance the training requirements for all IWWA members, assuming the training is presented with balanced views, or delegate application review authority to professional wetlands staff.**

**Also, the proposal as written could turn into a nightmare for wetlands permit applicants and municipalities alike. Stating on the record whether an IWWA is in compliance with the statute's training requirements could be interpreted as a jurisdictional prerequisite, potentially invalidating or making void any action the IWWA takes if they are not in compliance. I hope that is not the intent, but that would be an easy way to always say "no" to applicants, i.e., just state on the record the IWWA does not comply with statutory training requirements.**

Thank you for considering our comments on this legislation.

*"Leading Our Members to Professional Excellence."*

**Serving the Residential Development & Construction Industry Through Advocacy, Education & Networking**