



**Testimony
Elizabeth Gara
Connecticut Water Works Association (CWWA)
Before the
Environment Committee
Public Hearing
March 15, 2013**

**HB-6536 - AN ACT CONCERNING GENERAL PERMITS OF THE
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION**

The Connecticut Water Works Association (CWWA) *opposes* **HB-6536**, which imposes a new annual fee on entities operating under a general permit issued by the state Department of Energy and Environmental Protection (DEEP).

DEEP has made significant strides in enhancing the general permit process in ways that will improve efficiency, expand permit flexibility, and provide greater certainty to the regulated communities. Reducing the time and costs associated with the general permit process allows water utilities to operate more efficiently.

HB-6536 would undermine these efforts by significantly increasing the costs associated with general permits. Under current law, permit fees are already very high. For example, the fee for the General Permit for Inland Water Resources Construction Activities is \$5,000 for certain activities.

Water utilities are required to obtain a variety of general permits in order to meet their obligation to provide customers with an adequate, safe supply of water at a reasonable cost and comply with state environmental protection laws. Adding an annual user fee on top of the already steep permit fee will simply add to the cost of providing public water supplies to meet the needs of Connecticut residents and businesses.

**SB-1019 - AN ACT CONCERNING ADMINISTRATIVE STREAMLINING AT
THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION.**

CWWA *supports the provisions in* **SB-1019** which repeal the Stream Channel Encroachment Line Program administered by the state Department of Energy and Environmental Protection (DEEP).

This program requires DEEP to issue permits to regulate proposed development in floodplains along 270 miles of the state's most flood prone rivers. However, since the program was adopted in the 1950s, municipalities have incorporated guidelines governing proposed development in floodplains into local zoning laws consistent with the

guidelines established by the Federal Emergency Management Agency. Accordingly, the state program is no longer necessary.

According to a report prepared by the Connecticut Policy Institute, “the Department’s Inland Water Resources Division (IWRD) estimates that SCEL permit reviews take up about ten percent of the division’s resources. If SCEL were repealed, these resources would be freed up to provide faster service to the regulated community on other regulatory programs.”

CWWA urges support for this bill.

The Connecticut Water Works Association, Inc. (CWWA) is an association of public water supply utilities serving more than 500,000 customers, or population of about 2½ million people, located throughout Connecticut.