



CONNECTICUT RIVER WATERSHED COUNCIL

The River Connects Us

Lower Valley: deKoven House, 27 Washington St., Middletown, CT 06457

For the Committee on Finance, Revenue and Bonding

Testimony of Alicea Charamut, Lower River Steward

April 20, 2015

The Connecticut River Watershed Council is the principal nonprofit environmental advocate for protection, restoration, and sustainable use of the Connecticut River and its watershed.

Raised Bill No. 7055 – An Act Concerning Connecticut First

The Connecticut River Watershed Council has serious concerns with the proposed creation and implementation of a ‘federal deviation analysis’ as part of the rulemaking process. Connecticut’s state agencies set standards and propose and implement regulations for the good of the environment and human health. In the case of the Department of Energy and Environmental Protection, agency staff invests considerable resources in developing standards and regulations that are science-based and specific to Connecticut. Indeed many federal environmental standards or criteria are created with the idea that states will by necessity come up with more refined standards or criteria given local circumstances. DEEP does not set a standard or propose a regulation that differs from a federal standard for arbitrary reasons. Adding another level of paperwork via a federal deviation analysis will only place a financial burden on agencies and the taxpayers of the state with little additional gain in terms of clarity or transparency, given the already extensive analytical requirements of the state’s administrative procedures.

We urge you to vote against this provision of the bill as it is unnecessary and creates additional paperwork.

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