



Connecticut Chapter  
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Martin Mador, Legislative Chair

Government Affairs and Elections Committee  
February 13, 2015

Testimony In Strong Opposition to  
SB845 AAC The Fiscal Impact Of Proposed Agency Regulations

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

The Sierra Club strongly opposes this bill, and finds that it would be against the Public Interest to support it. Preparation of the required fiscal note would require an immense investment of agency resources. As we know these resources are already stretched very thin, this would have a significant impact on an agency's ability to fulfill its mission. Further, documenting any costs for all businesses as called for would be a herculean task. We find this a highly unreasonable, unnecessary, and profitless burden.

The bill calls for a public hearing in Regs Review. While it is difficult for a public interest advocate to argue against such a hearing, we note that never in its history has the Committee held a public hearing. Not once. This hearing would come after the agency had written the regulation in question. The proper time for such a hearing is before, not after. As the regulation would in most cases be proposed pursuant to legislation, the public hearing would have taken place when the bill was first considered.

Perhaps most importantly the bill addresses only the potential costs of a proposed regulation. Nowhere does it mention reviewing the benefits, environmental, economic or otherwise.

If the unstated purpose of this bill is to impede adoption of state regulation, we expect that such purpose would be met.

The Sierra Club vigorously opposes SB 845.

