



FOR THE GOVERNMENT ADMINISTRATION & ELECTIONS COMMITTEE  
PUBLIC HEARING TESTIMONY OF RIVERS ALLIANCE OF CONNECTICUT  
MARCH 13, 2015

To the Chairmen: Sen. Steve Cassano and Rep. Ed Jutila  
And to Members of the Committee

**Proposed Bill 845 AAC The Fiscal Impact of Proposed Agency Regulations**

*Rivers Alliance of Connecticut is the statewide, non-profit coalition of river organizations, individuals, and businesses formed to protect and enhance Connecticut's waters by promoting sound water policies, uniting and strengthening the state's many river groups, and educating the public about the importance of water stewardship.*

We write in opposition to Proposed Bill 845, which, if passed and implemented, would inevitably stall or block the adoption of agency regulations. Connecticut already has an unusual, possibly unique, two-stage regulatory process, with legislative review following the normal, arduous process (with public meetings and hearings) by which an agency adopts regulations as directed under state and federal law. This two-stage process leads to long delays in developing and passing regulations, for example, 14 years for aquifer protection regulations and 6 years for streamflow standards. As suggested in the testimony of Connecticut Fund for the environment, our state's legislative involvement in the administrative task of rulemaking verges on violating the principle of separation of powers. Another layer of legislative review and public comment, as proposed in RB 845, would exacerbate this problematic situation.

In addition, the requirement in the bill that an agency's fiscal note should include *any potential* costs to *all* businesses in the state and apparently all municipalities (the language isn't clear) could not be fulfilled in any finite span of time. There would always be one more potential cost that the agency hadn't thought of.

The bill seems to suggest that any regulation that might have an associated cost to any person is bad, irrespective of public benefits. That's a flawed approach to public policy.

A handwritten signature in cursive script, appearing to read "Margaret Miner".

Margaret Miner, Executive Director

[rivers@riversalliance.org](mailto:rivers@riversalliance.org) 203-788-5161 (mobile), Litchfield CT