



TO: Sen. Cathy Osten and Rep. Phil Miller, Chairmen,
And Honorary Members of the Planning & Development Committee

Testimony from Rivers Alliance of Connecticut
Public Hearing, March 11, 2016, on

RB 328 AAC Municipal Applications for Land Use Permits and Tax Abatements
Support

Rivers Alliance of Connecticut is a statewide non-profit organization, founded in 1992, as a coalition of river organizations, other conservation non-profits, individuals, and businesses working to protect and enhance Connecticut's rivers, streams, aquifers, lakes, and estuaries. We promote sound water policies and water stewardship through education and assistance at the local, regional, and state levels.

We strongly support this bill to halt the practice of submitting land-use permit applications in which the intended owner of the property and/ or the intended use is concealed. This practice is all too frequent around the state.

The identity of an intended owner is relevant for a number of reasons, including the possibility of a conflict of interest. The intended use is relevant to an informed assessment of the project. For example, a footprint of a proposed structure identified only as a manufacturing building is not adequate information. It makes a difference whether the activity will be metal plating, plastics manufacture, explosives manufacture, etc. Some manufacturing activities may carry the risk of degrading water resources at a considerable distance from the facility. Others may be environmentally benign -- even beneficial.

I am not sure that transparent process for permit applications outlined in this bill would apply equally to the process for tax-abatement proposals. I believe (am not certain) that, in the latter case, under current law, the identity of the owner, at least, has to be revealed before a vote. So perhaps the two matters (land-use applications and tax abatements) need separate sections.

It would be preferable if the transparency reform sought in this bill could be attained without the need for an ordinance. Transparency could simply be mandated, as it is statutorily mandated that, in zoning

applications, the identity of the owner of the property in question cannot be hidden in a blind trust. Or perhaps the transparency requirement could be implemented via a simple motion before the town's legislative body.

In Section 1 (1), I am not sure whether "developer" refers to a developer making the application (for an unnamed owner) or whether it refers to the intended developer, who might or might not be the owner. This question also applies in (3) and (4).

We thank you for raising this important bill, and would be happy to assist if we are able.

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