



Connecticut Fund
for the Environment

Save the Sound®

Connecticut Fund for the Environment/Save the Sound

Before the Commerce Committee

In Opposition

SB 265 AAC Expedited Permitting by the Department of Energy and Environmental Protection for Business Initiation, Expansion or New Production

SB 269 AAC the Assessment of Civil Penalties Against Small Businesses by the Department of Energy and Environmental Protection

Submitted March 8, 2018 by: Leah Schmalz, Chief Program Officer

Connecticut Fund for the Environment (CFE) is a non-profit organization with thousands upon thousands of member and over 10,000 activists. CFE, its bi-state program Save the Sound, and its SoundKeeper protect and improve the land, air, and water of Connecticut and Long Island Sound. We use legal and scientific expertise and bring citizens together to achieve results that benefit our environment for current and future generations.

Dear Senators Hartley and Frantz, Representative Simmons and Members of the Committee:

Please find below our testimony opposing both SB 265 and SB 269, the former is unnecessary and could have unintended consequences, the latter is both flawed and an unfair approach.

SB 265 AAC Expedited Permitting by the Department of Energy and Environmental Protection for Business Initiation, Expansion or New Production

Connecticut Fund for the Environment and its bi-state program Save the Sound (CFE/Save the Sound) writes to ask that you oppose SB 265 which requires that Department of Energy and Environmental Protection (DEEP) develop and implement a process for expediting permits of new businesses, expanding existing businesses or new product production. While we understand the intent and desire to encourage these activities, a formal expedited permitting process is not the appropriate incentive as it will overly burden a resource strapped agency and could result in inadequate environmental review, putting the health of citizens and the environment at risk.

DEEP has made extraordinary efforts—in dire budgetary circumstances and with reduced staffing—to cut permit review times, through LEAN and other government efficiency programs. Permit times are further improved by applicant meetings, a permitting ombudsman, and copious amounts of application information available by website and email. Unfortunately, the process called for in SB 265 could actually result in the opposite of the intended effect: longer permit review times. As DEEP would seek to comply with this new requirement, they would need to move staff to implementing this procedure, instead of working to hold the pre-meetings and helping to guide applicants as they currently do. This could mean less robust applications with missing information or data, which would require additional follow-up and a protracted timeline for decision making. Improving government efficiency is a good aim, unfortunately we believe application of the provisions in SB 265 would miss the mark. Therefore, **we request that you oppose SB 265.**

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