



**For the Planning and Development Committee  
Testimony of Alicea Charamut, Executive Director  
February 3, 2024**

*Rivers Alliance was formed to fight for sound water policies at the state and federal levels, to provide education on water resources, and to advocate for any person or group striving to protect water. If you want clean, free-flowing and healthy rivers, and high-quality drinking water, Rivers Alliance is here to help.*

Thank you for the opportunity to provide testimony on the following raised bill before you today.

**HB 6830 – AN ACT CONCERNING TRAINING FOR MEMBERS AND EMPLOYEES OF INLAND WETLANDS AGENCIES - SUPPORT**

Excerpt from CGA Sec. 22a-36. Inland Wetlands and Watercourses. Legislative Finding:  
*"The preservation and protection of wetlands and watercourses from random, unnecessary, undesirable, and unregulated uses, disturbance, or destruction is in the public interest and is essential to the health, welfare, and safety of the citizens of the state."*

The state has delegated the majority of the Department of Energy and Environmental Protection's (DEEP) authority to protect wetlands and watercourses to municipal Inland Wetlands and Watercourses Commissions (IWWCs). There are currently 170 such agencies in Connecticut, comprised of volunteer commissioners who serve as the frontline defense for preserving and protecting these irreplaceable resources.

Given the vital role these volunteers play, we fully support a requirement that every IWWC member complete the DEEP Municipal Inland Wetlands Agency Comprehensive Training Program.

**Why This Training is Essential**

The training program is now available online and can be completed at a volunteer's convenience. It consists of eight modules, each taking approximately one hour. This bill allows members one year to complete the training, requiring only an hour per month over eight months. Arguments that this requirement places an undue burden on volunteers overlook the significant benefits of a well-informed commission. A minimal time commitment to training ultimately streamlines monthly meetings, reducing time spent deliberating over the basics. This

results in greater efficiency, less frustration for both commissioners and applicants, and increased public confidence in agency decisions.

### **Updating Outdated Standards**

Current law requires only one member of an Inland Wetlands Agency—or a staff member—to complete DEEP’s comprehensive training. This standard was established 50 years ago when the Inland Wetlands and Watercourses Act (IWWA) was enacted. At that time, DEEP (then DEP) staff conducted periodic in-person trainings, which required significant travel and time commitments from volunteers. Today, with training available online, commissioners can complete it at their own pace, eliminating previous barriers to participation. Additionally, DEEP no longer needs to allocate resources to host each training session.

### **Ensuring the Training Stays Up to Date**

It is also critical that DEEP regularly updates the comprehensive training program to reflect changes in case law, statutes, and regulations. DEEP will argue that it lacks the resources for such updates. The Connecticut Council on Environmental Quality’s 2008 report *SWAMPED* described DEEP’s oversight of municipal IWWCs as "three coaches for 1,500 players." Since then, the situation has deteriorated further—DEEP now has **zero** staff dedicated solely to the inland wetlands program. DEEP must prioritize resources to support municipalities in fulfilling their delegated responsibilities and at the same time the legislature must also recognize the urgent need to increase DEEP’s capacity for this essential program.

To ensure the training remains current, we recommend the following amendment:

No later than June 1, 2026, the Commissioner of DEEP shall update the Comprehensive Training Program to incorporate all statutory changes applicable to inland wetlands agencies, as well as any relevant common law developments. The Commissioner shall submit the updated training program to the Joint Standing Committee of the General Assembly with jurisdiction over environmental matters.

### **Conclusion**

We strongly support this bill’s requirement that all IWWC members complete comprehensive training. With the training now available online, there is no justification for maintaining outdated standards that fail to adequately prepare commissioners for their critical role.