



**Testimony  
Betsy Gara  
Executive Director  
Connecticut Council of Small Towns  
Before the Environment & Commerce Committees  
September 17, 2020**

**RE: LISTENING SESSION: LCO 3962 - AN ACT CONCERNING VARIOUS REVISIONS TO THE  
PROPERTY TRANSFER LAW AND SPILL-BASED REMEDIATION OF CERTAIN  
HAZARDOUS WASTE**

The Connecticut Council of Small Towns (COST) respectfully submits the following comments relative to the proposed changes to the Transfer Act included in LCO 3962.

Public Act 19-75 made several significant changes to the Connecticut Transfer Act to facilitate the clean-up of properties by removing certain roadblocks for property owners and developers, including narrowing the types of hazardous waste that triggers the law's application and shortening the timeframe for commencing and completing audits under the program. Addressing these issues benefits municipalities by ensuring that such properties become viable for economic development, generating additional local revenues, and supporting job growth.

In addition, Public Act 19-75 directed the chairs of the legislature's Commerce and Environment Committees to convene a working group to continue to examine and develop recommendations for further revising the Transfer Act to expedite the remediation of properties.

COST supports the provisions in Sections 1 – 5 of the bill, which reflect the recommendations of the working group to clarify various provisions of the Transfer Act to facilitate remediation.

Sections 6 through 10 of the bill transition Connecticut from a transfer-based property remediation program to a release-based property remediation program. Although there may be significant merit to moving to a release-based property remediation program, we are concerned that there continue to be a lot of questions and concerns regarding this issue that have not been adequately vetted.

Accordingly, COST does not believe it is appropriate for this issue to be considered and voted on in a special session, particularly given the limitations on public discourse during the COVID-19 pandemic.

Thank you for the opportunity to comment.