



***ENVIRONMENT COMMITTEE
COMMERCE COMMITTEE***

September 17, 2020

The Connecticut Conference of Municipalities (CCM) is Connecticut's statewide association of towns and cities and the voice of local government - your partners in governing Connecticut. Our members represent 100% of Connecticut's population. We appreciate the opportunity to testify on bills of interest to towns and cities.

**LCO 3962 AAC VARIOUS REVISIONS TO THE PROPERTY TRANSFER LAW AND
SPILL-BASED REMEDIATION OF CERTAIN HAZARDOUS WASTE**

CCM appreciates the opportunity to submit testimony on proposed changes to the Transfer Act and to certain spill based remediation.

P.A 19-75 was enacted last year to, (1) exclude certain property and businesses from the Transfer Act by narrowing the types of hazardous waste that count towards the 100 kilogram threshold that triggers the law's application, (2) shorten, from three years to one year, the window for commencing audits of Transfer Act final verifications received on or after October 1, 2019, (3) require the DEEP to complete such audits within three years after receiving the final verification, and (4) require the Commerce and Environment committee chairpersons to convene a working group to examine the Transfer Act law and recommend potential legislative changes to it. The working group was mandated to report its findings and recommendations to the committees by February 1, 2020.

CCM has supported and continues to support the proposed changes which will make improvements to the existing Transfer Act.

However, we continue to have concerns with remaining sections of the draft language which would move remediation of environmentally impacted properties in Connecticut to a release-based cleanup program.

The proposed language would set a requirement for DEEP to establish regulations that the commissioner deems necessary for implementation, administration and enforcement of the release based program. CCM has concerns regarding the potential scope and impact, these regulations established by DEEP may have on property transfers and existing brownfield remediation and redevelopment programs that CCM has long supported.

These proposed changes may have a fiscal impact on towns and cities by requiring increased reporting, investigation and clean-up responsibilities for properties requiring remediation and that



may not be in a brownfield program. Any changes that would increase the cost to municipalities to remediate and ultimately redevelop properties will have a chilling effect and may see more properties remain abandoned and blighted.

CCM would urge the members of the Environment and Commerce Committees to continue their work with all stakeholders and not act upon this language until numerous questions and concerns can be adequately addressed. This is an issue that should be addressed in a comprehensive and open manner and in light of the current process being dictated by the COVID-19 pandemic, we urge the committees to wait until the 2021 legislative session before acting upon the proposed language.

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If you have any questions, please contact Donna Hamzy Carroccia, Advocacy Manager of CCM at dhamzy@ccm-ct.org or (203) 843-0705 or Randy Collins, Advocacy Manager of CCM at rcollins@ccm-ct.org or (860) 707-6446.