



**Betsy Gara**  
**Executive Director**  
**Connecticut Council of Small Towns**  
**Before the Environment Committee**  
**February 28, 2024**

The Connecticut Council of Small Towns (COST) supports the provisions regarding riparian buffers in **HB-5218 - AN ACT CONCERNING THE ESTABLISHMENT OF RIPARIAN BUFFERS AND REVISION OF CERTAIN INLAND WETLANDS PROVISIONS.**

Many communities throughout Connecticut are experiencing issues affecting the quality of drinking water due to PFAS, uranium, sodium chloride and other contaminants. In addition, towns are struggling to address issues impairing the water quality of lakes and rivers that provide recreational opportunities for residents and tourists. Maintaining riparian buffers would prove beneficial in protecting water resources from these contaminants in addition to providing greater protection from floods, erosion, and stormwater runoff.

COST therefore supports the provisions in HB-5218 which require the state Department of Energy & Environmental Protection (DEEP) to provide funding to secure conservation easements to protect riparian buffers and establish mandatory setbacks for development near rivers, streams, and other water ways. This will help protect the quality of water resources in our communities.

COST does have concerns regarding provisions in the bill which require every member of, and staff person employed by an inland wetlands agency to complete a comprehensive training program by January 2026 and every five years thereafter.

Although well-intended, COST has the following questions and concerns regarding the requirements outlined in the bill:

- 1) DEEP's existing comprehensive training program consists of an eight-module online course which is one hundred pages long in addition to supplemental materials that total 700 pages. Testimony on a similar bill last session, HB-5616, suggests that this training program should be updated. Does DEEP have the resources to update the training program in a timely manner? Does DEEP have the staff and resources to oversee administration of the expanded training requirement? It is our understanding that DEEP currently has very limited staff and resources dedicated to inland wetland issues.
- 2) COST is concerned that cumbersome training requirements may deter individuals from volunteering to serve on local inland wetlands agencies. Towns are finding it



increasingly difficult to find individuals that have the time and interest in serving on various boards and commissions. It is our understanding that the training consists of eight modules which take approximately one hour to complete. Given that the training may be updated, the legislation should cap the number of training hours that an individual must complete.

- 3) Similar training requirements for members of planning and zoning commissions exempt attorneys who have served on or been employed by the agency for four or more years. If the bill moves forward, we recommend that certain exemptions be included for individuals with experience and expertise in inland wetlands issues, such as attorneys, engineers, hydrologists, etc. Such individuals should be exempt or be eligible to request a waiver from any training requirement.

COST respectfully requests that these issues be fully considered if the committee decides to move forward with the legislation.

Thank you for the opportunity to comment on HB-5218.