



Testimony Regarding Governor's Bill No. 6441, An Act Concerning Climate Change Adaptation

Kevin A. Dillon, A.A.E.
Executive Director
Connecticut Airport Authority

Joint Committee on Environment
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Dear Senator Cohen, Representative Borer, Senator Miner, Representative Harding, and distinguished members of the Environment Committee,

My name is Kevin Dillon, and I am the Executive Director of the Connecticut Airport Authority (CAA). **I am submitting this testimony regarding Governor's Bill No. 6441, An Act Concerning Climate Change Adaptation**

The CAA has long sought to be a good environmental neighbor for the communities surrounding Bradley International Airport and the Authority's five general aviation airports. All six of the CAA's airports employ strong measures to control stormwater runoff from day-to-day operations and construction projects. Bradley International Airport is in full compliance with its DEEP-negotiated consent order, and all five general aviation airports are fully compliant with their DEEP-issued permits. The Authority has developed stormwater pollution prevention plans for all airports, and all development and redevelopment projects are designed with the goal of not resulting in any increases to off-site flow. We have designed most major infrastructure systems at our airports to retain and filter stormwater before ultimately releasing it. We regularly conduct testing of outflows at Bradley Airport, and we have historically seen very positive results in samples tested at our general aviation airports. At Bradley Airport, the Authority has also invested significantly in deicing fluid collection and storage facilities, as well as a comprehensive spent deicing fluid collection program. Even further, the vast majority of stormwater discharges on CAA airport property discharge to either nearby watercourses/wetlands or are retained onsite in engineered structures.

At a time when airport resources are already severely strained due to the downturn in global air travel, the CAA is very concerned that Sections 1-3 of this proposal could result in significant costs to our airports. This proposal does not appear to exempt properties of the state or political subdivisions of the state (such as quasi-public agencies), and it does not appear to require municipalities with stormwater authorities to even account for a property's utilization of that municipality's stormwater system. If municipalities base their cost allocation formulas primarily on the area of impervious surfaces, Connecticut's airports will be disproportionately impacted. Furthermore, federal law prohibits revenue diversion from US airports except for limited cases to compensate for actual services rendered. The CAA believes that paying a fee to maintain and develop an unutilized municipal stormwater system would constitute unlawful revenue diversion.

Considering that the primary revenue stream for the CAA's general aviation airports was down approximately 80% in the last six months reported, and is likely to remain severely constrained for the foreseeable future, any new, large costs could force drastic action. This includes the potential closure of CAA general aviation airport facilities. As a matter of fairness, the CAA respectfully requests that the committee consider JFS language in Sections 1-3 to exempt CAA airports that largely do not utilize municipal stormwater systems.

Thank you for the opportunity to provide these comments. Please feel free to contact me at (860) 292-2054 if you have any questions or concerns.

Sincerely,

Kevin A. Dillon, A.A.E.
Executive Director
Connecticut Airport Authority