



Audubon | CONNECTICUT

Environment Committee - Public Hearing of March 8, 2021

SUPPORT: House Bill No. 6551 - AN ACT CONCERNING ENVIRONMENTAL AIR QUALITY

Thank you for the opportunity to submit testimony on behalf of the National Audubon Society through its affiliate state office, Audubon Connecticut. The National Audubon Society protects birds and the places they need, today and tomorrow, throughout the Americas using science, advocacy, education, and on-the-ground conservation. Our conservation network extends statewide and includes more than 31,000 members, five Connecticut chapters, and many partners along the [Atlantic Flyway](#).

Through land stewardship, science, education and advocacy, we work across the state to preserve habitat and protect bird species that are of state, national, and global concern; and we identify and support Important Bird Areas (IBAs), a hallmark of Audubon's efforts worldwide. It begins with birds, but our mission connects people to a much wider range of issues, such as preventing air and water pollution, reducing pesticide use, promoting land conservation and reducing the impact of global climate change on birds, wildlife, and people.

The strength we derive as part of the National Audubon Society enables us to contribute to a broader conservation strategy—one that recognizes the need to conserve wildlife on a wide geographic scope. See the link below for more information about Audubon nature sanctuaries and centers that are part of a broad network of critical habitats for a host of birds and other wildlife species as well as peaceful respites for people. Our centers serve as community hubs for education, conservation, and engagement with nature.

<https://ct.audubon.org/about-us/centers-sancturries-and-chapters>

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The Governor's Council on Climate Change (GC3) included a number of working groups. One of those was the FINANCING AND FUNDING ADAPTATION AND RESILIENCE working group. That working group made recommendations to the GC3, who in turn made recommendations to the Governor.¹

¹ https://portal.ct.gov/-/media/DEEP/climatechange/GC3/GC3_Phase1_Report_Jan2021.pdf

On page 12 of the GC3 Phase 1 Report there is a description of the “Equity Lens.”

The Equity Lens - Embedded within Executive Order 3 is a commitment to equity. Executive Order 3, issued by Governor Lamont required, “prioritizing, integrating and *advancing equitable distribution of the costs and benefits of climate change mitigation planning policies, specifically addressing disproportionate impacts of such strategies on environmental justice communities*, and providing an Adaptation and Resilience Plan with “recommended strategies to prioritize climate change adaptation efforts to protect vulnerable communities that may be disproportionately impacted by the effects of climate change.” As further described below, this charge from the Governor translated to the creation of an Equity and Environmental Justice Working Group and a commitment on the part of all members of the GC3 and the Working Groups to look at every recommendation through an equity lens.

Section 1 of House Bill No. 6551 - AN ACT CONCERNING ENVIRONMENTAL AIR QUALITY establishes an “environmental equity working group” that is charged with establishing “criteria to identify disadvantaged communities and identify such communities for the purpose of co-pollutant reductions, greenhouse gas emissions reductions, regulatory impact statements and the allocation of investments under section 22a-200a of the general statutes.”

Members of the environmental equity working group will be appointed by the commissioners of Energy and Environmental Protection, Public Health, Housing and Labor.

Making meaningful improvements to vulnerable communities will require focused attention on communities that are disproportionately impacted by the historic and future siting decisions of polluting facilities. The creation of an environmental equity working group will improve the understanding of the on-going disparate impact of pollution in environmental justice and vulnerable communities. Hopefully, the environmental equity working group will shine light on this problem.

Section 2 of the bill states that:

... if the department [of Energy and Environmental Protection] or [the Siting] council determines that, together with other environmental or public health stressors affecting the environmental justice community, the proposed facility or new or expanded permit could cause or contribute to adverse cumulative environmental or public health stressors in such community that are higher than those of other communities in the state, on average, the department or council, as applicable, shall deny the subject application or permit or place conditions on the application or permit as necessary in order to avoid or reduce such adverse environmental or public health stressors affecting the environmental justice community.

This provision will strengthen Connecticut’s existing Environmental Justice law (see Section 22a-20a of the general statutes) by providing a meaningful standard for the potential cumulative

impact of environmental or public health stressors in an environmental justice community and we support the intent of this provision.

Thank you for the opportunity to present testimony on this proposal. Should you have any questions, please contact Robert LaFrance, Director of Policy, Audubon Connecticut, National Audubon Society at 203.668.6685 or at Robert.LaFrance@Audubon.org.